UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

APPLICATION OF TEXAS UTILITIES GENERATING COMPANY, ET AL. FOR AN OPERATING LICENSE FOR COMANCHE PEAK STEAM ELECTRIC STATION UNITS #1 AND #2 (CPSES)

Docket Nos. 50-445
and 50-446

CASE'S SIXTEENTH SET OF INTERROGATORIES
AND REQUESTS TO PRODUCE TO APPLICANTS

Pursuant to 10 CFR 2.740b and 2.741, CASE (Citizens Association for Sound Energy), Intervenor herein, hereby files this, its Sixteenth Set of Interrogatories and Requests to Produce to Applicants.

Please answer the following interrogatories and requests for documents in the manner set forth herewith:

1. Each interrogatory should be answered fully in writing, under oath or affirmation.
2. Each interrogatory or document response should include all pertinent information known to Applicants, their officers, directors, or employees, their agents, advisors, or counsel. Employees is to be construed in the broad sense of the word, including specifically Brown and Root, Gibbs & Hill, Ebasco, any consultants, subcontractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors.
3. Each document provided should include a sworn statement of its authenticity.

4. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.
5. Identify the person providing each answer, response, or document.
6. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the past directives of the Licensing Board. Because of the time restrictions under which we are presently working, we request that supplementation be made on an expedited basis.
7. For each item supplied in response to a request for documents, identify it by the specific question number to which it is in response. If the item is excerpted from a document, identify it also by the name of the document. Please also provide the copies in the correct order (rather than in reverse order).
8. The term "documents" shall be construed in the broad sense of the word and shall include any writings, drawings, graphs, charts, photographs, reports, studies, slides, internal memoranda, hand-written notes, tape recording, calculations, and any other data compilations from which information can be obtained.

CASE'S INTERROGATORIES AND REQUESTS TO PRODUCE TO APPLICANTS

The following are requests for documents in connection with the upcoming hearings (February 20-24) on the CYGNA Report. (We had planned to file this request early last week, but as explained to Judge McCollom 1/29/84, some of our key CASE workers have been ill recently and unable to assist.)

1. From Observation PS-02-01, drawings and calculations for supports SI-1-325-002-S32R Rev. 1, and RH-1-021-001-S22R, Rev. 3

2. From Observation PS-09-01, drawings and calculations for support SI-1-042-002-S22K, latest revision; also the seismic displacement in all directions of the pipe at that support location

3. From Observation PS-12-01, drawings and calculations for support RH-1-062-002-S22R, Rev. 5; also the table, chart or the method used to determine the allowable load on the PUS and PUH U-bolts

4. In Observation PI-02-04, drawings and calculations involved in support SI-1-037-005-S32A; also the calculations performed by CYGNA on the reinforcing pad

5. PI-02-05, all calculations and drawings performed by CYGNA in arriving at their calculated value of .98

6. CTS-00-01, CYGNA Tech. file 11.2.1.50, all drawings and calculations reviewed by CYGNA referenced in 3.2 of observation record

7. CTS-00-02, documentation showing "care was taken to ensure that maximum member loads, which were equal to the absolute sum of the dead and each seismic load component, were selected for use in the member design."

8. CTS-00-02, calculations (original and revised) referenced in 2.a of attachment A of Observation CTS-00-02

9. CTS-00-03, Gibbs & Hill Drawing 2323-S-0903, Rev. 5, and Gibbs & Hill calculation No. SCS-101C, Set 1

10. Calculations performed by Gibbs & Hill that are referenced in 2a and 2b of the resolution of Attachment A of CTS-00-03

11. CTS-00-04, Standard detail A_i from binder section A_1 to A_3 and D_i (A, B, C, D) from binder section D_1 to D_5

12. Calculations performed by Gibbs & Hill that are referenced in 2.0 of the resolution of attachment A of CTS-00-04

13. Re: CTS-00-05:

    (1) Gibbs & Hill calculation SCS-146C(II), Set 8, Sheet 21

    (2) TU design change document CMC-88306, Rev. 4

    (3) Gibbs & Hill calculations showing the stress in channel that is bent about its weak axis and its interaction with other stress in the channel.

13. (continued):

    (4) Calculations showing the design changes were acceptable on all revisions of CMC-88306.

    (5) Calculations performed by Gibbs & Hill showing the design was acceptable as referenced in 2.0 of Attachment A of CTS-00-05.

    (6) Calculations performed by CYGNA showing the design was acceptable as referenced in 2.0 of Attachment A of CTS-00-05.

14. Re: CTS-00-06:

    (1) That portion of output binder, input binder, math model referenced in 3.1.

    (2) Calculation No. SCS-104C, Set 1, Sheets 5, 6, 10, 34, and 35.

    (3) Calculations performed by Gibbs & Hill in the resolutions shown on Attachment A, paragraph 2.

15. Re: CTS-00-07:

    (1) Drawing 2323-E1-0601-01-S.

    (2) Calculations of initial base plate analysis and calculations of second check referenced in description 1.0.

    (3) Calculation No. SCS-104C, Set 1, Sheets 5, 6, 10, 34, and 35.

    (4) CYGNA Tech file 11.2.1.50, all pages.

    (5) Gibbs & Hill Calculations referenced in 2.0 resolution.

16. WD-01-01, all documents showing the lock nuts have been tightened.

17. WD-02-01, calculations by TU showing no interference.

18. WD-02-01, documentation of the originator that performed the original analysis and documentation at present that will assure relative moments will be considered in the design and final design analysis.

19. Observation WD-03-01:

    (1) As-built drawing for SF-X-033-007-F43R.

    (2) VCD drawing for SF-X-033-007-F43R.

    (3) VCD calculations for SF-X-033-007-F43R.

19. (continued):

    (4) The As-Built Re-Verification Report form 1267 as indicated in the Resolution.

    (5) The calculations used to show the "accept as-is" is valid.

    (6) All referenced documents used to show "accept as-is" is valid, unless previously furnished.

20. Cable Tray checklist CTS-03, item 2, calculation No. SCS-146C(11), Set 4, Sheet 10.

21. Cable Tray checklist CTS-04, item 2, SCS-146C (II) Set 4, Sheet 10, and SCS-101C, Set 3, Sheet 65.

22. Cable Tray Check list CTS-06, item 2, Calculation No. 146C(II), Set 8, Sheet 21.

23. Check List No. CTS-11, Item #1, Item #3 and 4 referenced.

24. Cable Tray checklist No. WD-01, item #3:

    (1) Documentation showing a PSA snubber is equivalent to that specified, as well as the VCD of SF-X-032-012-F53K.

    (2) Item #31, DCA #13177, and all calculations and reasoning for its basis.

    (3) Item #44, DCA #9087, Rev. 5, and all calculations and reasoning for its basis.

25. WD-03, Item #25, VCD SF-X-005-020-F43R, drawing showing 5 in. wide ~1/4" deep void under base plate, DCA #9087, Rev. 5 to Spec. 2323-MS-100 and basis showing acceptance.

26. Item #64 VCD SF-X-011-001-F45S calculations with as-built load showing missing weld is O.K.

27. WD-07, item #4C:

    (1) DCA-17147

    (2) Reasoning (with tests or calculations) showing a 3" or less horizontal separation is acceptable.

    (3) Item #5, DCA-17,397.

    (4) Reasoning (with tests or calculations) showing missing grip is acceptable.

28. PS-05, latest drawing and calculations for RH-1=010-003-S22R.

29. PS-07, latest drawing and calculations for SI-1-038-013-S22A

30. PS-10, latest drawing and calculations for RH-1-064-010-S22R.

31. PS-12, latest drawing and calculations for RH-1-062-002-S22R.

32. PS-16, latest drawing and calculations for SI-075-001-S22R.

33. PS-23, latest drawing and calculations for RH-1-010-004-S22K and RH-1-010-002-S22S.

34. PS-28, latest drawing and calculations for RH-1-024-011-S22A.

35. PS-30, latest drawing and calculations for SI-1-030-003-S32A.

36. The generic study performed by Texas Utilities in regards to self-weight excitation, referenced in Note 1 of Checklist No. PS-01.

37. CYGNA's response to TUSI memorandum CPPA21550 referenced in PS-16 in item 10. Also CYGNA's review of bolt separation versus depth.

38. TUSI memorandum CPPA 21550.

Respectfully submitted,

Juanita Ellis

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CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of

CASE'S SIXTEENTH SET OF INTERROGATORIES AND REQUESTS TO PRODUCE TO APPLICANTS

have been sent to the names listed below this 2nd day of February, 1984, by: Express Mail where indicated by * and First Class Mail elsewhere.

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