UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

*84 JLL -5 P1 54

In the Matter of: COMMONWEALTH EDISON COMPANY

(Byron Nuclear Station, Units 1 and 2) Docket Nos. 50+454 50-455

INTERVENORS' SECOND REQUEST TO EDISON FOR PRODUCTION OF DOCUMENTS

As used herein, the term "document" means all writings and recordings of any kind, including but not limited to notes, memoranda, summaries, drafts and computer stored and/or generated data in the possession, custody or control of Edison or its contractors. The term "meetings" includes telphone conversations. The term "contractor" includes all contractors at Byron including the architect-engineers and the independent testing laboratories. The term "consultant" includes any expert or person with expertise consulted by Edison and/or its contractors in connection with the Byron plant.

Please produce the following documents:

1. All welding procedure specifications, used by the Hunter Corporation, Hatfield Electric Corporation, and Pittsburgh Testing Laboratories, either to install or inspect hardware at the Byron Nuclear Station. This request includes welding specifications created by Sargent & Lundy, Commonwealth Edison, any contractors to Commonwealth Edison, and their consultants.

- 2. All names, line-by-line program listings, test run documentations, and program use manuals for SEISHANG, PIPSYS, and other "in-house" computer programs employed by Sargent & Lundy in its design of the Byron Nuclear Station, and utilized by Sargent & Lundy, the Nuclear Regulatory Commission, and inspectors for Commonwealth Edison, the Hunter Corporation, Hatfield Electric Corporation, and Pittsburgh Testing Laboratories, during the reinspection program conducted in response to the 82-05-19 noncompliance.
- 3. All names of commercial, time-share computer programs employed by Sargent & Lundy in its design of the Byron Nuclear Satation, and utilized by Sargent & Lundy, the Nuclear Regulatory Commission, and inspectors for Commonwealth Edison, the Hunter Corporation, Hatfield Electric Corporation, and Pittsburgh Testing Laboratories, during the reinspection program conducted in response to the 82-05-19 noncompliance.
- 4. All "pre-format," or standardized forms, used in connection with the computer programs and manuals referred to in Document Requests 2 and 3, above.
- 5. Any design tables and engineering procedures, developed by Sargent & Lundy, the Hunter Corporation, Hatfield Electric Corporation, Pittsburgh Testing Laboratories, Commonwealth Edison, or consultants to any or the above firms, for construction of the Byron Nuclear Station and/or used to review results from the reinspection program at this facility. This request includes, but is not limited to, a design table identified in Sargent & Lundy Weld Surveys for Byron and Fraidwood as

"Technical Training Design Package DV-89: Design Table for Varying Widths of Auxiliary Steel" (Bates Stamp No. S0005034).

6. Any design guides or other references employed to assist Særgent & Lundy, the Nuclear Regulatory Commission, Commonwealth Edison, the Hunter Corporation, Hatfield Electric Corporation, and Pittsburgh Testing Laboratories, in their evaluation of mathematical calculations concerning the inspection and reinspection programs conducted at the Byron Nuclear Station.

DATED: June 28, 1984

DOUGLASS W. CASSEL

One of the Attorneys for Intervenors on issues and matters pertaining to quality assurance

Douglass W. Cassel 109 North Dearborn Suite 1300 Chicago, IL 60602 (312) 641-5570

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of) Docket No. 50-454 (Byron Station, Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "INTERVENOR'S SECOND REQUEST TO EDISON FOR PRODUCTION OF DOCUMENTS" in the above-captioned proceeding have been served on the following by deposit in the U.S. Mail, first class, or as indicated by an asterisk, by Federal Express, this 2nd day of July, 1984, or as indicated by two asterisks, by hand-delivery on June 28, 1984.

*Ivan W. Smith, Chairman Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

*Dr. A. Dixon Callihan Administrative Judge Union Carbide Corporation P.O. Box Y Oak Ridge, Tennessee 37830

*Dr. Richard f. Cole
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

**Michael I. Miller, Esq. Isham Lincoln & Beale Three First National Plaza Chicago, IL 60603 *Stephen Lewis
Office of Executive Legal
Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Office of the Secretary of the Commission Attn: Docketing & Service Section U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Alan S. Rosenthal, Chairman Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Howard A. Wilbur Idministrative Judge Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555 Dr. Reginald L. Gotchy Administrative Judge Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Joseph Gallo ISHAM, LINCOLN & BEALE 1120 Connecticut Avenue N.W. Washington, D.C. 20036

General Counsel Region III Office of Inspection and Enforcement 799 Roosevelt Road Glen Ellyn, IL 60137

DATED: June 15, 1984

Law Clerk to Jane M. Whicher

Subscribed and Sworn to before me this 2nd day of July, 1984.

My Commission Expires Nov. 17, 1987