

[OCT - 3 1984]

Docket No. 50-483

Union Electric Company  
ATTN: Mr. Donald F. Schnell  
Vice President - Nuclear  
Post Office Box 149 - Mail Code 400  
St. Louis, MO 63166

Gentlemen:

The NRC received the enclosed Government Accountability Project (GAP) letter which contains 48 allegations and requests suspension of your low power license. Although the letter is dated September 28, 1984, it was not received and docketed by the NRC until October 2, 1984. We note that most of the allegations are general and much of the subject matter has previously been documented in nonconformance reports or construction deficiency reports.

It is requested that Union Electric promptly review/investigate the allegations and prepare a written response for each one. We are not asking you to take any action regarding the information requested in the attachment referred to in allegation number 42.

Your cooperation in this matter is appreciated.

Sincerely,

James G. Keppler  
Regional Administrator

Enclosures: As stated

cc w/encl:  
W. H. Weber, Manager, Nuclear  
Construction  
S. E. Miltenberger, Plant Manager  
R. L. Powers, Assistant Manager  
Quality Assurance  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
Region IV  
K. Drey  
Chris R. Rogers, P.E.  
Utility Division, Missouri  
Public Service Commission

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PDR ADOCK 05000483  
P PDR

SNUPPS & Government Accountability Project

RIII	RIII	RIII	RIII	RIII
<i>RFW</i>	<i>RFW for</i>	<i>OB</i>	<i>J</i>	<i>J</i>
Warnick/Is	Norelius	Berson	Davis	for Keppler
10/3/84	10/3/84	10/3/84	10/3/84	10/3/84

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# GOVERNMENT ACCOUNTABILITY PROJECT

1555 Connecticut Avenue, N.W., Suite 202  
Washington, D.C. 20036

28 September 1984

(202) 232-8550

Honorable Nunzio Palladino, Chairman  
Honorable James Asselstine, Commissioner  
Honorable Thomas Roberts, Commissioner  
Honorable Frederick Bernthal, Commissioner  
Honorable Lando Zeck, Commissioner  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Callaway Nuclear Power Plant, Unit 1  
authorized by NRC Operating License No. NFP-25

Dear Commissioners:

The Government Accountability Project (GAP) is a non-profit, non-partisan public interest organization concerned with honest and open government. Through legal representation, advice, national conferences, films, publications and public outreach, the project promotes whistleblowers as agents of government accountability. Through its Citizens Clinic, GAP offers assistance to local public interest and citizens groups seeking to ensure the health and safety of their communities. The Citizen's Clinic is currently assisting several citizens groups in the Missouri area concerning the construction of the Callaway Nuclear Power Plant.

On behalf of the Concerned Citizens About Callaway, and a number of present and former nuclear workers at the Callaway Nuclear Power Plant (CNPP), the Government Accountability Project requests that Nuclear Regulatory Commission (NRC) take immediate action regarding the allegations below. We request that the low power license be suspended until such time that each of the specific allegations listed below is investigated and that appropriate re-inspection is performed to determine the extent of the problems raised by each allegation.

The Nuclear Regulatory Commission has a duty and a responsibility established by Congress to assure that the use of nuclear material as in the operation of nuclear power plants is carried out with proper regard and provision for the protection of public health and safety and of the environment, the safeguarding of nuclear materials and facilities from theft and sabotage, and safe transport and disposal of nuclear materials and waste.

Federal regulations also establishes measures by which citizens can act when the citizens believe that the Nuclear Regulatory Commission has failed to honor its responsibilities. Pursuant to 10 CFR 2.206 any person may request the Nuclear Regulatory Commission itself to take action as deemed appropriate to resolve unanswered questions about the safety of a particular plant.

~~84-10020716~~

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We believe that the Callaway Nuclear Power Plant is not ready for low power operation. Serious allegations have been brought to our attention as a result of the breakdown in the quality assurance program. As defined in 10CFR50 Appendix B, I, the quality assurance functions are those of (a) assuring that an appropriate quality assurance program is established and effectively executed and (b) verifying, such as by checking, auditing, and inspection, that activities affecting the safety-related functions have been correctly performed. The quality assurance program at Callaway has not been executed effectively as required. Former and present Callaway workers have sought our assistance in presenting evidence of inadequacies in activities affecting safety related functions. These inadequacies have not formerly been identified by the quality assurance program.

A majority of the serious hardware problems are located in the Fuel building, Control building and Reactor building. At this late stage in construction, many of the problems are inaccessible. Nonetheless, it is critical that the extent of the problems be determined before the various parts of the plant become contaminated. Once lower power operation is underway, these hardware problems will be even less accessible and repair work will be more costly and dangerous.

The NRC's Region III has a history of some of the nuclear industry's worst problems: Midland, Marble Hill, Kerr-McGee Corp's Cimarron Plutonium Recycling Facility, Byron, and Zimmer. These nuclear power plants were crippled by too little regulation to attract management's attention or too late to make economical rework possible. Victory Gilinsky, a former member of the NRC, has asserted that without a doubt the NRC should have been more forceful with inspection and enforcement on the history of these Region III projects.

We are requesting the NRC to conduct an honest, open, and good faith investigation of the safety issues presented here. Anything less than this standard of investigation would indicate that the quality assurance breakdown extends to the NRC itself. At that point, quality assurance is carried by those on site alone, but the history of workers at Callaway is grim.

One case is immediately called to mind, that of Bill Smart. Bill Smart is a former ironworker and foreman at the Callaway Nuclear Power Plant. His case is a well known one of how he blew the whistle about poor construction practices. As a result of his whistle blowing he was fired. The law protecting whistle blowers has since changed, and construction workers are now protected from such retaliation. But the effect of his termination was already in place. His firing has had a chilling effect on the willingness of other Callaway workers to report



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suspected defects in workmanship to the Nuclear Regulatory Commission. The value of whistleblowers is immeasurable. Project workers are in a much better position to see shipshod and potentially unsound building practices at nuclear power plants.

Workers can do more to guarantee the sound construction practices at nuclear power plants than the occasional spot checks by NRC inspectors. NRC inspectors actually examine only one to five percent of on-site construction. Thus, quality assurance is virtually left solely to the workers. For these reasons we present these allegations.

The following allegations have been compiled from notarized affidavits by former workers. These allegations, gathered by GAP investigators during a six month investigation, reflect deficiencies in construction and quality control. The totality of these deficiencies have serious implications regarding the integrity of the managerial and administrative controls used to assure the safe operations of the Callaway Nuclear Power Plant.

1. Painters at Callaway have prepared thousands of welds in the Reactor Building for painting by removing the rust-proofing from the welds. The rust-proofing was removed with grinders from these welds that had already been Quality Control inspected and approved. No measurements were made of the remaining weld metal or base metal. Since no re-inspection has been done, the quality and safety of thousands of welds in the Reactor Building is now indeterminate.

2. Welders have ground smooth the horizontal, the vertical and the floor panel welds of the Spent Fuel Pool, Transfer Canal and Cask Loading Pool. In the process, negligent welders removed weld metal and base metal. As a result of this overgrinding, certain areas of these pools no longer meet thickness requirements. The integrity of the Spent Fuel Pool, Transfer Canal and Cask Loading Pool is questionable.

3. Furthermore, hasty and improper rework was done on the seam welds of the liner plates in the Spent Fuel Pool, Transfer Canal, and Cask Loading Pool. These liner plates are defective in that they are not exactly square. This defect made original welding difficult. The seam welds of the liner plates were reworked but because of time constraints, the welds were not sufficiently repaired.

4. Weld metal joining the reinforcing ribs and the steel liner plates of the Containment Building has been eaten away by rust and corrosion. These welds located on the backside of the steel liner plates were not rust-proofed. Corrosion covered the backside of these plates before they were encased in concrete.

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5. Bad welds exist on pipehangers as well as on the embed plates that anchor the pipehangers. These pipehangers and embeds are located near the floor of the Reactor Building. They are difficult to reach due to the surrounding installed equipment. The bad welds have excessive weld material, tiny holes, and pockets on the surface; some of the welds are actually incomplete. No rework has been done on these faulty welds.

6. Not all welds that have been Quality Control approved have been Quality Control inspected. Welds in difficult to reach areas, such as on unistruts, have been approved without the Quality Control inspector's examination. There are also welds that have been approved without inspection located on the condensers in the Turbine Building.

7. Inexperienced and underqualified welders were employed at Callaway. Union pipefitters and welders were not hired by Daniels International because there was a shortage of skilled welders. As a result, a welder training program was established. The program was very brief, and it was commonly referred to as a program which produced "instant welders". Journeymen welders generally spend several years developing the expertise required for welding. This program produced welders in a matter of weeks.

8. Furthermore, the welder certification testing program allowed almost everyone who took the examination to pass. Thus, the program permitted inadequate welders to weld safety related structures.

9. The welder certification testing program did not screen out these bad welders. It was apparent that it was set up for the purpose of producing men to do the work rather than to risk slowing up production by withholding certification from bad welders. In fact, it was reported as common knowledge that the welding certification supervisor for several years would look the other way, and certify technically inadequate welders. He did this in exchange for the payment of bribe money. Workers who were unable to weld adequately graduated from this program.

10. Yet another technique used to pass welder-applicants was accomplished by allowing applicants to take the test as many times as was necessary. If an applicant failed, the test was not considered as a "test" but rather merely as practice. Welder-applicants took the test as many as five times before an acceptable weld was produced.

11. As a result of using this underqualified and inexperienced work force, much rework had to be done. The pipe hanger department suffered the most because the worst welders

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were often relegated to pipehanger welding. Many of these welders were hired during the construction of the Control Building. Pipehangers and supports were slapped in by these inexperienced welders to keep the construction of the Building on schedule. A lot of shoddy work was done, and duplicate work was required by the hanger department in later years.

12. This mode of construction creates many problems. Once construction was complete, repair and rework was done on the lower levels of the Control Building two to three years later. Some of the welds could not be reached; some were covered with concrete. This rework weakens the metal because of the required reheating. The tensile strength is reduced and the metal becomes brittle. In addition, the cost of each weld that has to be reworked is doubled.

13. Quality Control inspectors did not always maintain the necessary independence from the pressures of schedule and cost. It was reported that Quality Control inspectors would sometimes approve without inspection welds located in hard to reach areas. These areas are exactly the places where it is more difficult to do welding, and therefore, more important to inspect for poor welds.

14. Quality Control inspectors were known to favor their friends. They would inspect to a lesser standard than they were required.

15. Those Quality Control personnel who attempted to be assertive in their positions have been subjected to intimidation and harassment. It is reported that workers have dropped things from heights such that the hardware dropped would land near the Quality Control inspectors. Quality Control inspectors have been splashed with concrete and with water, and one Quality Control inspector had his hand intentionally smashed with a vibrator by a workman.

16. Quality Control-issued "hold tags" often left workers idle for one or two days. "Hold tags" indicate that there is a problem with the tagged item and all work on this item should be stopped until the problem is resolved. Once the problem is resolved, a Quality Control inspector removes the tag and work can continue on the item. Often, a foreman or supervisor would eventually give the order to proceed with work and ignore the hold tags. Workers questioned the unexplained orders to proceed when the work had not been changed or been seen fixed. Either money was being wasted on non-problems or safety deficiencies were being accepted.



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17. There was a shortage of Quality Control inspectors. One worker reports waiting six, ten hour days for a Quality Control inspector. During this delay, the worker was not permitted to move onto a new work assignment.

18. Deficient electrical cable has been used on safety related systems throughout the plant. Generic problems regarding the environmental qualification testing of this Class 1E electrical cable have been recognized and acknowledged by the NRC, Office of the Inspection and Enforcement. It is reported that this cable is literally all over the plant.

19. Electrical cables were installed too early in construction operations. The cables have been exposed to the harsh environment of early construction and have been damaged during construction from hot metal and other elements thrown around during early construction.

20. Violations of electrical wire bend radius are reported. Eighty to eight-five percent of junction boxes are too small through the Auxiliary Building and the Control Building. Because these junction boxes are undersized, wires which feed in and out of the boxes are overstressed.

21. There are no protective cable jackets and static bleeder wires on cables feeding through the cabinets into the Control Room. Protective cable jackets and half-wrapped, outside electrical interference deflector wire were removed in order to fit the cables through the undersized cabinets.

22. High voltage splicers frequently are submerged under water in eight foot deep concrete man holes. These man holes, built for high voltage splicers, have no drainage system. Water collects in the man holes submerging the electrical cables until the water eventually evaporates.

23. Insufficient fire proofing has been installed on these high voltage splicers. These splicers have only one-third the required fire-proofing.

24. The use of vibrators was an ineffective means of spreading concrete. Vibrators did not settle all of the concrete. Throughout the pours, the density of the concrete and the high volume of reinforcing steel created problems with the flow of the concrete. Pockets of air were created around the reinforcement bars. Voids remain in the concrete.

25. The only attempt to test the concrete for voids was the visual inspection. Visual inspection, as the only means used to detect voids, reveals only those voids which are apparent

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on the surface of the concrete. Sound testing is not an effective means of detecting voids because of the high volume of reinforcing steel used. For instance, in the base mat of the Containment Building, there was approximately one pound of reinforcing steel for every nine pounds of concrete.

26. Patchwork of the voids was very limited. The rebar prevented cement finishers from reaching some of the more extensive voids. Thus, grouting was done only in those areas that the finishers could reach.

27. Defective bolts were used to install the embeds on concrete ceilings of the Control Building. These embeds were not installed at the time of the concrete pours of the ceilings as planned. Instead, these plates were placed with expansion bolts. Some of the expansion bolts used were "Redheads". "Redheads" have been found by many construction companies to be defective.

28. Drainage in the Auxiliary Building is poor. Six to eight inches of water on the lower floor has been reported repeatedly. Possibly there is debris clogging the pipes or the pipes are too small to handle the large volume of water.

29. Pipehangers soiled with metal filings and dirt during the flood of the Reactor Building on June 2, 1984 have not been cleaned. These hangers were cleaned on their outer, easy to clean side, but were not cleaned inside the band which extends entirely around the pipe. The integrity of the pipe will be jeopardized by these dirty hangers.

30. Construction drawings were not being updated and revised as necessary. For instances, laborers cutting a trench to lay a pipe discovered a six-inch diameter pipe. There was no record of the pipe on the construction drawing. The identity of the pipe was unknown to the crew as well as to the supervisor.

31. Construction drawings were defective. A concrete column was poured according to the construction drawings. It was later discovered that this column was too high to meet the necessary connecting beam. The concrete column had to be entirely removed. Construction of the column was halted for three months thereafter, while the drawings were being corrected.

32. Poor construction resulted from engineering errors in 5005 construction drawings. 5005 drawings were used for the installation of cable tray supports in the Control Building and the Auxiliary Building. As a result of the poor engineering, hangers were not centered properly on the embeds. The non-conformance report attributed the poor construction to craft error. In fact, the error was due to the incorrect drawings



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issued by engineers. Quality Control approved this inaccurate construction and accepted "as is". "As is" approval did not reflect appropriate engineering review.

33. Undocumented rework was performed on the Transfer Tube. Under cover at night two boilermakers welders and two helpers removed a piece of this stainless steel tube in order to do repair work within the tube. This work was done without any paper or documentation and without any Quality Control inspection.

34. The reliability of the on-site laboratory is challenged by inaccurate test results. During the flood of the Reactor Building of June 2, 1984, fiberglass insulating blankets were soaked with borated water. Eighty-five blankets were removed and sent to the on-site laboratory to be tested for damage caused by the caustic acid. The on-site laboratory concluded that the borated water soaked blankets did not need to be replaced. The strength of the blankets had in fact deteriorated such that they could be shredded by hand. The blankets were ultimately found to be defective by the pressure of the workers and were replaced.

35. Dosimeters were not worn by workers in the Reactor Building while fuel was being loaded in the Reactor Core. SNUPPS Radiological Emergency Response Plan requires that all personnel entering the controlled areas be issued thermoluminescent dosimeter badges. Most workers in the Reactor Building had not been issued badges nor had they been given the necessary radiation protection training. Without radiation detection badges, it was impossible for anyone to determine the level of exposure to radiation while working in the Reactor.

36. Psychological testing conducted in late 1983 and early 1984 failed to remove the potentially bad elements from the work site. Acts of sabotage have occurred since the examination was administered. On July 4, 1984, there was such an act. Breakers in the Motor Control Room in the Auxiliary Building were shut off. It has been reported that in connection with the circuit breaker shut off, a voice announced over the communications system at the plant, "UE - Have a nice fourth of July". For the following days, craft workers made a joke about "UE - Have a nice day".

37. The psychological test failed as a screen for employees, but served as a means of harassment. Workers were coerced into taking the test. Everyone on site was given an opportunity to take the test. The test was not required although non-tested employees who had been on site for less than three continuous years of service could not be employed in restricted

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areas, that is, behind the fence. Those who refused the test faced certain termination for lack of work opportunity.

38. The psychological test, the Minnesota Multiphasic Personality Inventory is a test intended for psychological diagnosis. There is no pass or fail standards for a diagnostic test. At the Callaway site, a pass/fail system was imposed on the test. Infact, several dozen employees were terminated because they failed to pass the test.

39. The general attitude of workers about construction operations at the Callaway Nuclear Power Plant is that it is a disgrace to the construction industry.

40. There have been enormous amounts of cost overruns at the plant. There were excessive amounts of manpower on site. Approximately 200 electricians were hired in late 1983. Despite this almost one-third increase in manpower, there had been no increase in the work assignments. In general, the plant was overwhelmed with manpower. Seven, ten to twelve hour shifts became mandatory. Employees who could not maintain this demanding work schedule and missed a day of work were terminated. A medical excuse, a death in the immediate family or a call to jury duty were the only acceptable excuses for any absence. Bogus medical excuses were available on site for three dollars. Less work was done during this manpower overload than previously in an eight hour day.

41. People were idle on the job site. Some slept at work; a few brought in alarm clocks to wake them up in time to go home.

42. Illegal drugs, alcohol, gambling and prostitution could be found on the job site. In February of 1984, seven Quality Control employees were fired for alleged drug use. Please refer to the attached articles from the Kingdom Daily Star-Gazette. The Government Accountability would like information about the drug-related terminations and related developments at the Callaway Nuclear Power Plant, including but not limited to, the attached list of questions.

43. Workers were almost encouraged not to accomplish too much too quickly. One witness reports that he was physically threatened at work for working too hard. He told his foreman and it was taken as a joke. Other workers report that crews were eventually split up if they were working too fast.

44. Poor management was another cause of the cost overruns at the plant. For instances, it is reported that two electricians spent eight hours hanging one electrical light

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fixture. This fixture could have been hung by one man in one hour. Much of the delay was due to the lack of work assignments. Work assignments were required for any job on site. Sometimes a worker would be idle for one or two days waiting for such an assignment. In the meantime, the worker would appear to be busy or would just sit around until he was issued a work assignment.

45. Cost overruns can also be attributed to the high volume of discarded materials. For instance, one individual reports that over the course of his employment as a dump truck driver, he dumped several thousand pounds of welding rods. Welding rods are very expensive; many companies control the rods when the rods are issued to the welders as well as when they are returned. Daniels, on the contrary, only controlled these rods when they were issued to workers. It is reported by one worker that he has seen, on several occasions, welders take out ten pounds of welding rods in the morning, not use any of the ten pounds of rods during the day, and later dispose of the ten pounds in the barrel provided on site.

46. Barrels were provided on site for disposal of welding rods. The barrels were filled with welding rod stubs as well as unused welding rods. These barrels were later dumped in on-site landfills. Welding rods were prohibited in the landfill. It was also against regulations for workers to dump their garbage from home in the landfill, but this was routinely ignored. Many people, including the general supervisor, would bring garbage from home and dump it in this landfill.

47. Many acts of sabotage have also been reported. The NRC, in its latest inspection reports, admits to eleven acts of malicious mischief regarding the destruction of electrical cables. Workers have found various items in pipes such as scraps of steel wire, electrical cables, two by four inch wooden boards, and welding rods. These pipes had to be cut open in order to remove the material. It was generally understood by workers that these acts were done deliberately to slow up work production.

48. Although these construction and Quality Assurance problems would be serious under any circumstances, they are made more for the following reason. The Nuclear Regulatory Commission, Region III has been violating its own rule regarding on-site inspections. The construction inspection offices of the NRC profess that all on site inspections by the NRC are to be unannounced to personnel on site. Quite the contrary, many workers have reported that employees on all levels were pre-notified by their foreman or general foreman of upcoming NRC inspections. Several days before the inspection, the job site would be prepared for the NRC. Workers, who had not been



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Nuclear Regulatory Commission

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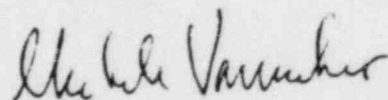
directly informed, would know of an upcoming inspection when they were taken off of their regular job assignment and put onto a clean up crew. This prenotification weakens the NRC inspection process itself and raises serious doubts about the reliability of the staff conclusions concerning the quality and safety of the plant.

In conclusion, we reiterate our request for the following relief: we request that the low power license be suspended until such time that each of the specific allegations listed above is investigated and that appropriate re-inspection is performed to determine the extent of the problems raised by each allegation.

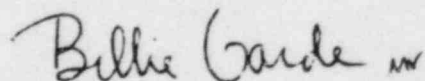
We have included allegations regarding waste and cost overruns, because this letter will also be received by the Missouri Public Service Commission. These allegations reflect an indifferent attitude that prevails on all levels of employment at the Callaway Nuclear Power Plant. We believe that ultimately this attitude affects the safety related functions of the plant.

We will be glad to discuss the allegations and a plan for resolving these open issues. With the evidence of recurring nature of quality assurance problems at this plant, a piece meal approach is inappropriate. We look forward to your response.

Sincerely,



Michele Varricchio  
Staff Associate



Billie Garde  
Director of Citizens Clinic

CC:  
NRC, Region III  
Missouri Public Service Commission

GAP REQUESTS INFORMATION REGARDING  
DRUG-RELATED TERMINATIONS AND RELATED DEVELOPMENT AT  
CALLAWAY NUCLEAR POWER PLANT (CNPP)

Please refer to the attached articles from the KINGDOM DAILY SUN GAZETTE 2/21/84.

1. When was the investigation into drug use at CNPP initiated by Applicants or its Contractors?
2. Who specifically (name, title, organization, authority) instigated the investigations?
3. Why was the investigation into drug use at CNPP initiated?
4. What was the specific event which triggered the investigations? Give complete details.
5. What is the status of the investigation at this time?
6. If the investigation is not complete, when is it expected to be completed?
7. What has been done with the drugs confiscated by Applicants or its Contractors?
8. What law enforcement agency (or agencies) have been notified by Applicants or its Contractors regarding this matter?
9. What, if any, law enforcement agency (or agencies) have been involved in the investigation?
10. Has the investigation by law enforcement agency (or agencies) been completed.
11. If the investigation by law enforcement agency (or agencies) has not been completed, when is it expected to be completed?
12. Supply the name(s) of the individual(s) with law enforcement agency (or agencies) who have been involved in the investigation and information as to how and where such individual(s) can be contacted.
13. How many (total) employees have been investigated to date by Applicants or its Contractors?
14. How many employees have Applicants (or others) investigated to date who are with the following organizations:
  - (a) Plant Operations;
  - (b) Quality Assurance (onsite);
  - (c) Quality Assurance (other);

GAP REQUESTS INFORMATION REGARDING DRUG-RELATED TERMINATIONS AND RELATED DEVELOPMENT AT CALLAWAY NUCLEAR POWER PLANT (CNPP)

- (d) Quality Control Supervision or Management -- Non-ASME;
  - (e) Quality Control Supervision or Management -- ASME;
  - (f) Quality Control Inspectors -- Non-ASME;
  - (g) Quality Control Inspectors -- ASME;
  - (h) Engineering;
  - (i) Engineering Supervision or Management;
  - (j) Construction;
  - (k) Construction Supervision or Management;
  - (l) Building Management;
  - (m) Project Control/Procurement;
  - (n) Project Control/Procurement Supervision or Management;
  - (o) Project Management Control;
  - (p) Project Management Control Supervision or Management;
  - (q) Document Control Center;
  - (r) Document Control (Satellites);
  - (s) Document Control (Other)
  - (t) Personnel or Employment personnel;
  - (u) Personnel or Employment Supervision or Management;
  - (v) Security personnel;
  - (w) Security Supervision or Management;
  - (x) Vendor personnel;
  - (y) Vendor Supervision or Management;
15. Have all of the employees who were/are under suspicion or who have been accused by others of taking or selling drugs been interviewed personally?
16. Have all of the employees who were/are under suspicion or who have been accused by others of taking or selling drugs been asked to take lie detector tests?
17. Have any supervisory employees been asked to take lie detector tests?
18. Have any upper management employees been asked to take lie detector tests?
19. What form has this investigation take (personal interviews by Applicants or their agents, personal interviews by law enforcement officials, written questions, lie detector tests, discussions with other employees, etc.)? Give specific details, including what specific actions Applicants or its Contractors have taken to confirm whether or not specific individuals have been involved in drug-related activities.
20. What specific drugs have been found onsite?
21. If different from above, what specific drugs have been identified by employees (or others) as having been used onsite?



GAP REQUESTS INFORMATION REGARDING DRUG-RELATED TERMINATIONS  
AND RELATED DEVELOPMENT AT CALLAWAY NUCLEAR POWER PLANT (CNPP)

22. (a) Have Applicants' or others' investigations indicated or confirmed (specify which) that employees have used or have been using drugs onsite?
- (b) If the answer to (a) is yes, how many employees have been indicated or confirmed to have used drugs onsite? Supply the total number, and answer for each organization listed in 14. preceding.
23. Have Applicants' or others' investigations indicated or confirmed (specify which) that drugs have been sold onsite by employees of Applicants or their agents (to include contractors, sub-contractors, vendors, etc.)?
24. Have Applicants' or others' investigations indicated or confirmed (specify which) that drugs are still being sold onsite?
25. What specific drugs have been identified by employees or others as have been sold onsite?
26. (a) Have Applicants' or others' investigations indicated or confirmed (specify which) that anyone other than employees (of Applicants or their agents) have sold drugs onsite?
- (b) If the answer to (a) is yes, supply complete details.
27. Have Applicants made any specific efforts to ascertain whether or not supervisory, or middle or upper management have been involved in:
- (a) taking drugs at CNPP?
- (b) selling drugs at CNPP?
28. If the answer to 27. is yes, supply specific details of what efforts Applicants or its Contractors have made.
29. (a) Have Applicants or its Contractors made any effort to determine whether or not anyone in a supervisory position or in middle or upper management has ever attempted to force or coerce other employees to take drugs?
- (b) If the answer to (a) is no, why haven't they?
- (c) If the answer to (a) is no, do they have any plans to do so?

GAP REQUESTS INFORMATION REGARDING DRUG-RELATED TERMINATIONS  
AND RELATED DEVELOPMENT AT CALLAWAY NUCLEAR POWER PLANT (CNPP)

- (d) If the answer to (a) is yes, what have been the results of such efforts? Provide specific details.
30. Was each employee terminated if it was determined that he/she:
- (a) had ever taken drugs?
  - (b) had ever been picked up for possession of drugs?
  - (c) had a conviction record for possession of drugs?
  - (d) had ever taken drugs onsite?
  - (e) had ever taken drugs offsite which may have had an effect on such employee's work?
  - (f) had ever sold drugs?
  - (g) had ever sold drugs onsite?
  - (h) had a conviction record for selling drugs?
  - (i) had ever sold drugs onsite?
  - (j) had ever sold drugs offsite which may have had an effect on the work of other employees at CNPP?
31. How many employees have been terminated to date who were with the organizations listed in 14. preceding.
32. (a) Have Applicants reinspected or do they plan to reinspect the specific buildings and/or systems on which all employees suspected of taking or selling drugs work or have worked?
- (b) If the answer to (a) is yes:
- (i) list the specific buildings which have already been reinspected, and indicate the extent and status of such reinspections.
  - (ii) list the specific systems which have already been reinspected, and indicate the extent and status of such reinspections.
  - (iii) supply specific details, by building and by system regarding the results of such reinspections.

GAP REQUESTS INFORMATION REGARDING DRUG-RELATED TERMINATIONS  
AND RELATED DEVELOPMENT AT CALLAWAY NUCLEAR POWER PLANT (CNPP)

- (c) If the answer to (a) is no, give specific details of of Applicants' plans and the rationale for their actions in this regard.
  - (d) If the answer to (a) is yes:
    - (i) list the specific buildings which have not yet been reinspected.
    - (ii) do Applicants plan to reinspect the specific buildings listed in (i) above? If not, why not? If so when are such reinspections expected to be begun, and when are such reinspections expected to be completed?
    - (iii) list the specific systems which have not yet been inspected.
    - (iv) do Applicants plan to reinspect the specific systems listed in (iii) above? If not, why not? If so, when are such reinspections expected to be begun, and when are such reinspections expected to be completed?
  - (e) If part of the rationale for Applicants' decisions regarding reinspections is because of redundant and independent inspections:
    - (i) what specific actions have Applicants taken to determine whether or not (for example) more than one QC inspector suspected of drug use or sale worked in one particular area or on one particular system? Give complete details.
    - (ii) for each system on which an employee suspected of taking or selling drugs works or has worked, list the categories (such as field engineers, equipment manufacturers, other QC inspectors, Authorized Nuclear Inspectors, etc.) on which Applicants are relying for such redundant and independent inspections.
33. (a) Have Applicants or Contractors contacted the Nuclear Regulatory Commission (NRC) regarding the drug-related terminations and related developments at CNPP?



GAP REQUESTS INFORMATION REGARDING DRUG-RELATED TERMINATIONS  
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- (b) If the answer to (a) is yes, supply the following information:
  - (i) Who specifically with the NRC was contacted, and who specifically with Applicants contacted the
  - (ii) What has the response of the NRC been? Give full and specific details.