

7/19/84

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

DOCKETED
USNRC

'84 JUL 23 110:38

CASE'S TWENTY-FOURTH 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 Twenty-Fourth 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, sub-contractors, 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, handwritten 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 interrogatories pertain to information necessary to respond to Applicants' 6/25/84 Motion for Summary Disposition of Maximum Roughness Surface Preparation Issue, as well as other aspects of protective coatings.

1. Provide for inspection and copying the original and all revisions of Comanche Peak construction procedure CCP-30, "Coating Steel Substrates Inside Reactor Building and Radiation Areas." (Referenced in Brandt Affidavit at 2.)

2. Regarding the statement on page 2 of Mr. Brandt's Affidavit:

"Applicants' personnel prepare steel substrates in three alternative ways: sandblasting; power tooling; and hand sanding. Power tooling includes the use of flapper wheels, 3-M Clean 'n' Strip disks (used with a rotary power tool), and belt sanders."

. . . is documentation of these statements contained in construction procedure CCP-30?

3. If the answer to 2. is no, identify by name and number the procedure, specification, etc., in which such documentation is contained.

4. Provide for inspection and copying the original and all revisions of such procedure, specification, etc., identified in 3. above.

5. Identify by name, number, and date the procedures which were used or are being used for protective coatings at Comanche Peak.

6. Identify by name, number, and date the specifications which were used or are being used for protective coatings at Comanche Peak.

7. Provide for inspection and copying the original and all revisions of each of the procedures identified in 5. preceding.

8. Provide for inspection and copying the original and all revisions of each of the specifications identified in 6. preceding.

9. What documentation is there to support the statements on page 2 (bottom paragraph):

"All steel substrate inside containment, including the liner plate and all structural steel, was originally prepared for primer coat by sandblasting. Applicants utilize power tooling only for repair or rework. The major part of the total area of all safety-related coating surfaces, therefore, were prepared by sandblasting."

10. Supply the documentation referenced in 9. preceding for inspection and copying. (If it is included in any of the other documents already requested herein, identify the document(s) and the page number(s).)
11. Are Applicants' committed to Steel Structures Painting Council (SSPC) Surface Preparation Specification No. 10, Near-White Blast Cleaning (commonly referred to as SP-10)? (Brandt Affidavit at 3.)
12. If the answer to 11 is yes, what document sets forth this commitment?
13. If the answer to 11 is yes, supply the original and all revisions of the document which sets forth this commitment for inspection and copying.
14. What document to which Applicants are committed sets forth Applicants' commitment to the use of No. 3 blasting sand for sandblasting?
15. Supply the original and all revisions of the document referenced in 14. preceding for inspection and copying.
16. With reference to the use of blasting with large sand (Brandt Affidavit at 3, first paragraph), it is stated:

"According to the specification, therefore, Applicants will normally achieve a maximum profile height of 2.8 mils for steel substrate surfaces prepared by sandblasting." (Emphasis added.)

 - (a) Have there been instances where a maximum profile height of more than 2.8 mils has been achieved?
 - (b) Have there been instances where a maximum profile height of more than 3 mils has been achieved?
 - (c) If the answer to (a) or (b) is yes, give complete details for each such instance.

16. (continued):

- (d) In the instances where a maximum profile height of more than 3 mils was achieved, was a report of some sort issued documenting that this was a non-conforming condition?
 - (e) If the answer to (d) is yes, what kind of report (NCR, IR, Unsat, etc.) was issued in each instance?
 - (f) If the answer to (d) is yes, supply for inspection and copying the original and all revisions of each such report.
 - (g) How many instances have there been where a maximum profile height of more than 3 mils was achieved?
 - (h) Was there ever a Corrective Action Report or CAR issued because a maximum profile height of more than 3 mils was achieved?
 - (i) Was there ever a report made to the NRC that the achieving of a maximum profile height of more than 3 mils was a potential significant deficiency?
 - (j) If the answer to (i) is yes, identify by name, number, and date the specific report(s) made.
 - (k) If the answer to (i) is yes, supply each such report and all related documents for inspection and copying.
17. Have there been instances where a minimum profile height of less than 1.0 mils has been achieved?
18. If the answer to 17. is yes, give complete details for each such instance.
19. In the instances where a minimum profile height of less than 1.0 mils was achieved, was a report of some sort issued documenting that this was a nonconforming condition?

20. If the answer to 19. is yes, what kind of report (NCR, IR, Unsat, etc.) was issued in each instance?
21. If the answer to 19. is yes, supply for inspection and copying the original and all revisions of each such report.
22. How many instances have there been where a minimum profile height of less than 1.0 mils was achieved?
23. Was there ever a Corrective Action Report or CAR issued because a minimum profile height of less than 1.0 mils was achieved?
24. Was there ever a report made to the NRC that the achieving of a minimum profile height of less than 1.0 mils was a potential significant deficiency?
25. If the answer to 24. is yes, identify by name, number, and date the specific report(s) made.
26. If the answer to 24. is yes, supply each such report and all related documents for inspection and copying.
27. What documentation is there for the statement (Brandt Affidavit at 3, last paragraph):

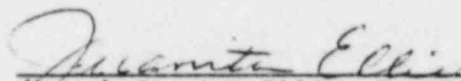
"Even if sandblasting were to produce a surface profile in excess of 2.8 mils, there would be no loss in the integrity of the primer coating."

28. Supply for inspection and copying the documentation referenced in 27. preceding.

There are additional questions and requests for documents regarding Applicants' 6/25/84 Motion for Summary Disposition of Maximum Roughness Surface Preparation Issue, as well as other aspects of protective coatings which we will be filing. We are filing what we have here so that we can get

it into the hands of the Applicants, the Staff and the Board as quickly as possible. Additional requests will be forwarded in the next day or so.

Respectfully submitted,



(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound
Energy)
1426 S. Polk
Dallas, Texas 75224
214/946-9446

Chairman
Atomic Safety and Licensing Appeal
Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

John Collins
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76011

Michael D. Spence, President
Texas Utilities Generating Company
Skyway Tower
400 North Olive St., L.B. 81
Dallas, Texas 75201

Docketing and Service Section
(3 copies)
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

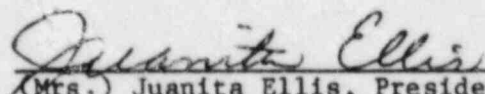
Renea Hicks, Esq.
Assistant Attorney General
Environmental Protection Division
Supreme Court Building
Austin, Texas 78711

Lanny A. Sinkin
114 W. 7th, Suite 220
Austin, Texas 78701

Dr. David H. Boltz
2012 S. Polk
Dallas, Texas 75224

Anthony Roisman, Esq.
Trial Lawyers for Public Justice
2000 P St., N.W., Suite 611
Washington, D. C. 20036

Ms. Billie P. Garde
Government Accountability Project
1901 Que Street, N. W.
Washington, D. C. 20009



(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound Energy)
1426 S. Polk
Dallas, Texas 75224
214/946-9446