

10/18/84

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter of

TEXAS UTILITIES GENERATING
COMPANY, et al.

(Comanche Peak Steam Electric Station
Station, Units 1 and 2)

'84 OCT 22 AM 11:11

Docket Nos. 50-445-1
and 50-446-1

SECRETARY
OF THE BOARD
OF NUCLEAR REGULATORY COMMISSION

CASE'S DISCOVERY REQUESTS TO APPLICANTS REGARDING
CROSS-OVER LEG RESTRAINTS

Pursuant to the Board's 10/5/84 Memorandum and Order (Discovery on Cross-Over Leg Restraints) and the Board's 10/11/84 Memorandum (Telephone Conference Held This Morning) (at page 2), CASE (Citizens Association for Sound Energy) files this, its Discovery Requests to Applicants Regarding Cross-Over Leg Restraints. (See also 10 CFR 2.740b and 2.741.)

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 & 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.

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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 and all writings, drawings, graphs, charts, photographs, reports, studies, slides, internal memoranda, hand-written notes, tape recordings, calculations, and any other data compilations from which information can be obtained.

CASE'S INTERROGATORIES AND REQUESTS TO PRODUCE TO APPLICANTS

1. In Applicants' Attachment 1 to their 9/14/84 Response to CASE Motion for Discovery Regarding Inspections of Main Coolant System Crossover Leg Restraints (8/23/84 TXX #4271, response to NRC), Applicants state:

"The installations shall be inspected to current design documents in accordance with the established QA/QC Program." and the original design documents and all revisions Provide the "current design documents" referenced, including any and all applicable specifications, procedures, guidelines, etc.

2. On page 3 of Applicants' Attachment 1, they state:

"A review of this issue showed that documentation does exist on the installation, however, it was found to be incomplete to substantiate the acceptability of the installation under the quality program. It should be noted that craft and QC had recognized the need for the components to be inspected, however, the documentation was not completed. Therefore, this situation appears to be isolated in its occurrence and no further action outside of the re-inspection is anticipated."

- (a) Provide the documentation which exists on the installation (as referenced in first sentence above).
- (b) In what way was the documentation found to be incomplete; i.e., what specifically was necessary to complete the documentation?
- (c) Provide a list of the specific QA/QC procedures which would be applicable to the inspections of the installations of the crossover leg restraints.
- (d) Provide copies of the specific QA/QC procedures which would be applicable to the inspections of the installations of the crossover leg restraints.
- (e) Provide the basis, and any and all supporting documentation, for the statement that "craft and QC had recognized the need for the components to be inspected."
- (f) Applicants stated that "this situation appears to be isolated in its occurrence and no further action outside of the re-inspection is anticipated." Provide a list, and copies of, the specific QA/QC procedures which would be applicable to the inspections of:

the upper lateral restraint; and the moment restraint (referenced in CASE's 8/22/83 Proposed Findings of Fact and Conclusions of Law (Walsh/Doyle Allegations) beginning at page XIX - 18).

3. On page 3 of Attachment 1, Applicants state:

"The inspections shall be completed no later than August 24, 1984." (Although this seems to have been changed in Attachment 2.)

- (a) Have the inspections now been completed?
- (b) If the answer to (a) above is no, when will they be completed?
- (c) If the answer to (a) above is yes, provide any and all documentation regarding such inspections.

4. Provide the following information regarding Applicants' Attachment 2 to their 9/14/84 Response to CASE Motion for Discovery Regarding Inspections of Main Coolant System Crossover Leg Restraints (9/7/84, TXX-4294, supplementary response to NRC):

(a) Provide copies of the original and all revisions of NCR-M84-100281.

(b) Applicants stated:

"Approximately two years ago, a decision was made to intentionally postpone completion of the installation (shimming and torquing) of the crossover leg restraints until after completion of Hot Functional Testing."

- (1) Who specifically made or had input into such decision (name, company affiliation, title, and job responsibility)?
- (2) Provide any and all documentation for Applicants' statement above.
- (3) What was the reason for the postponement of the testing until after completion of Hot Functional Testing and/or until power ascension testing?

- (4) Provide any and all documentation of the reasons for such postponement.
 - (5) Is it Applicants' current intention to postpone this testing until during power ascension testing?
 - (6) If the answer to (5) above is yes, what is the reason for such postponement?
 - (7) If the answer to (5) above is yes, provided any and all documentation of the reasons for such postponement.
- (c) Provide the original and all revisions of Test Instruction/ Procedure Deviation (TPD) Report No. 12 on the Reactor Coolant System.
 - (d) Provide any and all documentation that thermal monitoring of the shims will take place during power ascension testing (i.e., specific procedures which so state, memoranda, etc.)
 - (e) Provide any and all documentation that the "work required to be completed during plant heat-up after fuel load is identified as a known work item on the Master System Punchlist."
 - (f) Provide the original and all revisions of NCR-M84-100182.
 - (g) Provide any and all documentation that "Further work required by TPD-12 has been carried as an open item in the Test Deferral Package since the issuance of TPD-12 on May 25, 1983."
 - (h) Have Applicants performed any testing regarding the torquing of the bolts for the crossover leg restraint installations, especially in light of the results of Applicants' tests regarding the torque used for U-bolts (see CASE's Answer to Applicants' Statement of Material Facts As To Which There Is No Genuine Issue

Regarding Consideration of Cinching Down of U-Bolts, in the form of Affidavit of CASE Witness Jack Doyle, at page 10)?

- (i) If the answer to (h) above is yes, provide all such tests and test results.
- (j) If the answer to (h) above is no, do Applicants anticipate performing any such tests? (If not, why not?)
- (k) If the answer to (h) above is no, what assurance is there that the bolts will perform in a predictable manner throughout the life of the plant?
- (l) Provide any and all documentation for your answer to (k) above.
- (m) Applicants state:

"We will conduct the necessary inspections when an engineering determination indicates the timeliness for completing the inspections."

- (1) Provide any and all procedures which state that such an engineering determination will be made.
- (2) Provide any and all procedures which set forth the criteria for such engineering determination.

- (n) Applicants state:

"It is unclear whether the inspector saw the QC inspector's checklists for the crossover leg restraints. TPD-12 was not presented to the inspector."

- (1) Why would the NRC inspector not have seen the QC inspector's checklists for the crossover leg restraints (i.e., where would the QC inspector's checklists have been if not with the documentation which the NRC inspector saw)? Include in your answer, in detail, what steps Applicants have taken to discover the answer to these questions and the results of

Applicants' efforts in this regard, and the answers to the following questions:

- (i) How could this have occurred?
 - (ii) What assurance is there (including any and all documentation for such assurance) that this has not and will not also be the case in other instances?
 - (iii) What steps have Applicants taken to assure themselves (and the Board) that this is an isolated instance and not a generic (to Comanche Peak) problem?
- (2) (i) Why was TPD-12 not presented to the NRC inspector?
- (ii) Why would TPD-12 not be included in the package for the crossover leg restraints?
 - (iii) Is there a procedure which states that such TPD's shall be included in the packages for the respective items to which they pertain (and, if so, provide any and all such procedures)?
 - (iv) Include in your answer, in detail, what steps Applicants have taken to discover the answer to these questions and the results of Applicants' efforts in this regard, and the answers to the following questions:
 - (aa) How could this have occurred?
 - (bb) What assurance is there (including any and all documentation for such assurance) that this has not and will not also be the case in other instances?

(cc) What steps have Applicants taken to assure themselves (and the Board) that this is an isolated instance and not a generic (to Comanche Peak) problem?

(o) Provide any and all documentation (if not already provided in response to the preceding) to support Applicants' statement that:

"(1) the completion of the inspections of the restraints were intentionally postponed, and (2) testing documentation does demonstrate the need for the inspections."

(p) (1) Were any of the QC inspectors involved in any way with inspections of the crossover leg restraints who quit or were terminated (including being laid off) in connection with or because of the recently identified drug-related problems at Comanche Peak?

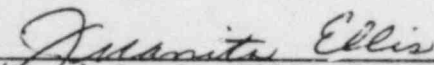
(2) If the answer to (1) above is yes, give complete details, including the name(s), title(s), specific areas and systems on which the individual(s) worked at any time (and specifically when, for what period of time, and specifically what part such individual(s) had regarding) on the inspections of the crossover leg restraints), and any other pertinent details.

(3) If the answer to (1) above is no, describe in detail what steps Applicants have taken to ascertain the information requested in (1) above.

- (q) How much of the information requested in the preceding was:
- (1) Requested by the NRC representative at the CPSES site?
 - (2) Provided to the NRC representative at the CPSES site prior to this pleading?

To expedite matters, if Applicants would prefer (since CASE will probably want all of the documents requested in the preceding anyway), they can go ahead and supply us copies of all requested documents at \$.07 per page. In the alternative, please provide the documents for inspection and copying.

Respectfully submitted,



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Station, Units 1 and 2)	}}	

OFFICE OF SECRETARY
DOCKETING & SERVICE
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CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of
CASE's Discovery Requests to Applicants Regarding Cross-Over Leg Restraints

have been sent to the names listed below this 18th day of October, 1984,
by: Express Mail where indicated by * and First Class Mail elsewhere.

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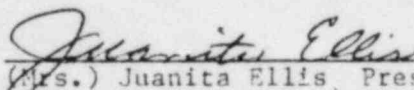
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