

12/03

Admission of Facts

consider separating structures to have better chance of accepting

The plant fill problem and cracking of ~~certain safety related structures~~ ^{the DGB, SW structure & Borated Water Tank} are a result of inadequately compacted fill materials.

Midland is the first nuclear power plant ^{site}, where surcharging of a nearly completed concrete ~~cat~~ Cat. I safety related structure (the DGB) was employed.

A Foundation design of a structure to be supported on piles or caissons would be required by good engineering practice to have ^{revisedly} established the static and dynamic loads to be imposed ~~with a reasonable degree of accuracy before~~ and ~~to~~ ^{have} determined that an acceptable margin of safety ^{was available} ~~would exist~~ to resist the anticipated loads before permanently installing the piles or caissons ^{system} in the field.

3/6/01

Subject: Upcoming Hearings on Midland

Discussed w/ Bill Paton

To minimize length of hearings, certain legal means are available to establish FACTS in the case upon which both parties can agree.

SUMMARY DISPOSITION (or judgment)

This document lists the FACTS which can not be disputed & which a judgment can be made without further testimony.

REQUEST FOR ADMISSION OF FACTS (See CFR Sect. 2.142, pg. 78)