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November 20, 1984

RELATED CORRESPONDENCE

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'84 NOV 21 A9:26

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
TEXAS UTILITIES ELECTRIC	)	Docket Nos. 50-445-2
COMPANY, <u>et al.</u>	)	50-446-2
	)	
(Comanche Peak Steam Electric	)	(Application for
Station, Units 1 and 2)	)	Operating Licenses)

APPLICANTS' INTERROGATORIES AND  
REQUEST FOR DOCUMENTS REGARDING  
LINER PLATE

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, Applicants hereby submit the following request for discovery and production of documents. Applicants are requesting this information in light of the Statement by Intervenor that Exhibit 2 to its November 15, 1984 pleading was obtained "through its independent investigation of this matter, not through discovery in this case." CASE's Further Evidence Of A Quality Control Breakdown In The Construction, Installation And Inspection Of The Stainless Steel Liner Plate, November 15, 1984 at 2. Applicants are also requesting this information so that they will be able to respond to CASE's allegations regarding the liner plate, the underlying, evidentiary bases for which have yet to be stated clearly on the record. Because this matter is to be litigated during the next round of hearings, Applicants urge that CASE respond to their request by November 23, 1984.

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As used below, the term "documents" includes any writings, drawings, graphs, charts, photographs, electronic recordings including but not limited to tape recordings, and any other data compilations from which information can be obtained. If Intervenor maintains that some documents or other information should not be made available, it should specify such documents and information and explain why they are not being made available.

1. State the date of the investigation referenced above in CASE's November 15, 1984 pleading.
2. With respect to that investigation state:
  - a. The identity of those individuals who carried out the investigation.
  - b. The activities of each of these individuals and the dates on which they performed such activities.
  - c. The qualifications of each individual, including his or her education and experience relevant to the activities performed.
3. Identify those individuals who CASE contacted during the course of this investigation and provide their current address.
4. Identify and provide all statements, notes, recordings or other memorializations of information gathered in connection with the investigation referenced above.
5. Identify and provide all documents regarding the construction of Comanche Peak, including all travelers and other materials pertaining to the liner plate, gathered during the investigation referenced above in the possession of Intervenor not obtained through discovery.
6. Identify the source of each document set forth in response to request 5.
7. Identify and provide all reports, compilations, documents or any other materials generated during or as a result of the investigation referenced above.
8. With respect to Exhibit 1, page 5 of CASE's November 15, 1984 pleading:

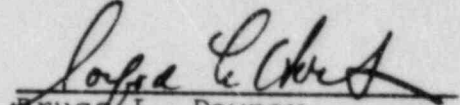
- a. Identify all welding procedures governing the fit-up and cleanliness for embed to plate welds and the basis for your response.
  - b. Provide the basis for your statement that, "the correct welding procedure used for Embed to Plate is 88025."
  - c. Provide the basis for your statement that welding procedure 88023 was not the correct procedure to be used for embed to plate.
9. With respect to Exhibit 1, page 7 of CASE's November 15, 1984 pleading:
- a. Do you contend that "missing hold point 7" violates any code, specification, procedure or other regulatory requirement?
  - b. Provide the basis for your response to question 9a.
10. With respect to Exhibit 1, page 8 of CASE's November 15, 1984 pleading:
- a. Do you contend that "missing hold point 7" violates any code, specification, procedure or other regulatory requirement?
  - b. If so, provide the basis for your response to question 10a.
  - c. Do you contend that "welds that do not have WFML's in package" violate any code, specification, procedure or other regulatory requirement?
  - d. If so, provide the basis for your response to question 10c.
11. With respect to Exhibit 1, on pages 9-15 inclusive of CASE's November 15, 1984 pleading, Intervenor asserts that there is no supporting documentation referenced on certain travelers that show QC verification.
- a. Do you contend that this violates any code, specification, procedure or other regulatory requirement?
  - b. If so, provide the basis for your response to question 11a.
12. With respect to Exhibit 1, on pages 16-20 inclusive of CASE's November 15, 1984 pleading, Intervenor asserts that there is no QC verification or involvement shown with respect to certain welding.

- a. Do you contend that this violates any code, specification, procedure or other regulatory requirement?
  - b. Provide the basis for your response to question 12a.
13. With respect to Exhibit 1, page 21 of CASE's November 15, 1984 pleading:
  - a. Do you contend that the allegations set forth thereon establish the violation of any code, specification, procedure or other regulatory requirement?
  - b. Provide the basis for your response to question 13a.
14. With respect to Exhibit 1 of CASE's November 15, 1984 pleading at page 22, CASE alleges that for certain welds "Final V.T. of inside welds has been signed off . . . without the vacuum box and/or [penetrant] examination being performed or required by procedure."
  - a. Do you contend that this constitutes the violation of any code, specification, procedure or other regulatory requirement?
  - b. Provide the basis for your response to question 14a.
15. With respect to Exhibit 1, of CASE's November 15, 1984 pleading, at page 22 CASE alleges that certain welds were signed off by James Cole "without the P.T. examination or vacuum box testing being performed."
  - a. Do you contend that this constitutes the violation of any code, specification, procedure or other regulatory requirement?
  - b. Provide the basis for your response to question 15a.
16. With respect to Exhibit 1 of CASE's November 15, 1984 pleading at page 22, CASE alleges that "[t]he final V.T. of inside welds were signed off . . . by other inspectors."
  - a. To whom do you refer to as "other inspectors"?
  - b. Do you contend that this constitutes the violation of any code, specification, procedure or other regulatory requirement?
  - c. Provide the basis for your response to question 16a.
17. With respect to Exhibit 1 of CASE's November 15, 1984 pleading at pages 23-24 inclusive, CASE alleges that certain welds have "the completion of weld inspection block on

Attachment 1 signed off as completed prior to the completion on welds prior to vacuum box testing and/or P.T. inspections performed."

- a. Do you contend that this constitutes the violation of any code, specification, procedure or other regulatory requirement?
- b. Provide the basis for your response to question 17a.

Respectfully submitted,



~~Bruce L. Downey~~  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
TEXAS UTILITIES GENERATING	)	Docket Nos. 50-445-2
COMPANY, <u>et al.</u>	)	50-446-2
	)	
(Comanche Peak Steam Electric	)	(Application for
Station, Units 1 and 2)	)	Operating Licenses)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Interrogatories and Request for Documents Regarding Liner Plate" in the above-captioned matter were served upon the following persons by deposit in the United States mail, first class, postage prepaid,\* or by hand-delivery this 20th day of November, 1984 or by hand-delivery\*\* on the 21st day of November, 1984:

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