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RELATED CORRESPONDENCE

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March 13 1985
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

| | | |
|-------------------------------|---|------------------------|
| In the Matter of |) | |
| |) | Docket Nos. 50-445 and |
| TEXAS UTILITIES ELECTRIC |) | 50-446 |
| COMPANY, ET AL. |) | |
| |) | (Application for |
| (Comanche Peak Steam Electric |) | Operating Licenses) |
| Station, Units 1 and 2) |) | |

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APPLICANTS' RESPONSE TO
CASE'S FOURTH SET OF INTERROGATORIES AND
REQUESTS TO PRODUCE "RE: CREDIBILITY"

I. INTRODUCTION

Pursuant to 10 C.F.R. §§2.740b and 2.741, Applicants hereby respond to CASE's Fourth Set of Interrogatories and Requests to Produce Re: Credibility, filed February 25, 1985. Applicants' response is governed further by the Board's February 15, 1985, Memorandum (Motion for Protective Order), whereat the Board granted, in part, Applicants' motions for protective orders by restricting Applicants' obligation to respond to CASE's discovery requests regarding credibility¹ "to discovery related to the validity or reliability of tests and samples" (Memorandum at 1). Accordingly, Applicants respond only to those requests which are

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¹ These discovery requests were authorized by the Board in its December 18, 1984, Memorandum (Reopening Discovery; Misleading Statement).

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within the scope of the authorized discovery. Those discovery requests to which a response is not provided are deemed by Applicants to be beyond that scope.²

II. APPLICANTS' RESPONSE TO CASE'S
FOURTH SET OF INTERROGATORIES

2. Regarding A500 Steel:³

a.(5)(ii): Do Applicants consider that the sample of pipe supports discussed at the top of page 6 was a randomly selected representative sample?

Response: Yes.

a.(5)(iii): Provide documentation of the specific criteria which Applicants originally used in selecting the sample of pipe supports discussed at the top of page 6.

Response: There is no documentation delineating specific criteria. The "criterion" employed was simply a mechanical selection process from a list of all supports in Unit 1 and

² Applicants also consider CASE's first through third sets of interrogatories "re: credibility" (filed January 17, February 4 and 25, 1984, respectively) to be outside of this authorized scope in their entirety. Accordingly, separate responses regarding those requests are not provided.

³ Applicants filed their Response to the Board's Partial Initial Decision Regarding A500 Steel on April 11, 1984. CASE previously submitted interrogatories regarding this Response on May 17, 1984, with a motion for discovery. Upon resolution of Applicants' objections, Applicants responded to the authorized requests orally and/or in writing.

common, which was described in the affidavit accompanying Applicants' April 11, 1984, Response as follows:

To generate the sample of supports for this analysis, Applicants first developed alphabetical listings of all Unit 1 and common area ASME supports for each support design organization (NPSI, ITT-Grinnell and PSE). Applicants then selected every hundredth support (PSE selected every 90th) from the list. If the selected support did not utilize A500 tube steel, the next support on the list which did was chosen.

a.(5)(iv): Who (name, title, organization at the time) determined the specific criteria which Applicants originally used in selecting the sample of pipe supports discussed at the top of page 6.

Response: John C. Finneran, Jr., Pipe Support Engineer, Pipe Support Engineering Group, Comanche Peak Steam Electric Station.

a.(5)(v): Who (name, title, organization at the time) actually selected the specific pipe supports included in the sample of pipe supports discussed at the top of page 6?

Response: Three engineers were responsible for identifying the supports in accordance with the predetermined selection "criteria". These individuals were:

- G. M. Chamberlain for PSE (large bore)
- D. Y. Chuang for PSE (small bore)
- D. M. Rencher for ITT-Grinnell and NPSI

a.(5)(vi): Provide all documentation that the supports assessed by Applicants were worst case supports.

Response: CASE appears to have misinterpreted Applicants' statement regarding "worst case supports" at the top of page 6 of the affidavit accompanying Applicants' Response (see also answer to questions 2.a.(6), below). There it was stated " . . . Applicants have examined the actual yield strengths for A500 tube steel in a sample of pipe supports and conservatively assessed the worst case supports." Applicants did not intend to suggest that the sample of supports selected was itself comprised of the "worst case" supports. Rather, for all supports in the sample Applicants evaluated the effect of using the revised yield strengths (see Affidavit at 6-7). In addition, Applicants selected from the sample of supports utilizing A500 tube steel the worst case supports, i.e., ten supports with most highly stressed support members (see Affidavit at 7-8), for additional assessment using actual yield strengths.

a.(5)(vii): Provide a list of all pipe supports included in the sample of pipe supports discussed at the top of page 6.

Response: Except for the PSE small bore supports, Applicants already furnished this information by letter dated September 6, 1984. A list of the PSE small bore supports was not previously requested by CASE. That list is enclosed with this response.

a.(5)(viii): Provide a list of the pipe supports from the sample identified in your answer to (vii) preceding which were considered by Applicants to be the worst case supports which Applicants "conservatively assessed."

Response: The worst case supports Applicants conservatively assessed (see response to a.(5)(vi)) were the supports from the sample with the ten highest stressed members fabricated with A500 tube steel (see Applicants' Response (Affidavit at 7-8)). These supports are:

LARGE BORE

1. FW-1-100-002
2. CC-2-028-704-A33A
3. CH-2-206-716-A33R
4. CC-1-008-015-S33R
5. BR-X-044-006-A53R
6. SW-1-004-013-A33R
7. MS-1-004-003-S72R
8. AF-1-001-035-Y33R

SMALL BORE

1. H-CH-2-AB-010-017-3
2. H-FSI-X-2617-01-02-2

In addition, CASE will recall that Applicants already provided CASE with a list of supports, and relevant documentation for the supports, which Applicants were informed CASE considered to be "worst case", i.e., the 20 large bore

supports with the greatest interaction values and any supports in Applicants' sample which utilized intermediate Richmond Inserts and which were not in the first group of twenty supports (there were three such supports) (see Applicants' letter to CASE dated September 6, 1984.)

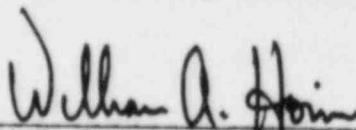
a.(5)(ix): Provide copies of all documentation (calculations, drawings, etc.) for each of the pipe supports listed in your answer to (vii) preceding.

Response: Applicants object to this request as being duplicative, unduly broad and burdensome in light of the documentation already provided CASE. The issue involved is narrow, i.e., whether A500 tube steel members in supports are adequately designed if one assumes the applicability of revised yield values published in an ASME code case. CASE's request is unduly broad in that it seeks material not relevant to the adequacy of the tube steel members (e.g., all calculations for the supports). Therefore, if discovery is to be had at all it should be limited to the portions of the design regarding the A500 tube steel members. In addition, as previously noted, Applicants have already provided CASE with the drawings and calculations of 23 supports. Thus, CASE's request is in part duplicative of material already provided. Finally, the 23 supports for which documentation was already provided were, using CASE's own criteria, the "worst case" supports in the sample.

Thus, to provide the information CASE now seeks would be unduly burdensome in view of the information already provided. Applicants submit that no additional benefit would be gained by directing resources to gather and reproduce these documents when those which CASE previously considered were most important to the issue have already been provided.

2.a.(6)(i)-(vii). Response: These requests duplicate requests 2.a.(5)(ii)-(vii) and (ix), respectively, in that the sample discussed at the top of page 6 in Applicants' affidavit is the same sample discussed in the middle paragraph of that page. Accordingly, the answers to these two sets of questions are the same.

Respectfully submitted,



Nicholas S. Reynolds
William A. Horin

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Counsel for Applicants

March 13, 1985

State Of Texas)
County of Somervell)

John C. Finneran, Jr., being first duly sworn deposes and says:

That he is the Pipe Support Engineer, Pipe Support Engineering Group for Comanche Peak Steam Electric Station and knows the contents of the foregoing Applicants' Response to CASE's Fourth Set of Interrogatories and Requests to Produce "Re: Credibility"; that the same is true of his own knowledge except as to matters therein stated on information and belief, and as to that he believes them to be true.

John C. Finneran, Jr.
John C. Finneran, Jr.

STATE OF TEXAS
COUNTY OF SOMERVELL

Subscribed and sworn to before me this 13th day of March, 1985.

Bill J. Hodges
Notary Public
BILL J. HODGES
MY COMMISSION EXPIRES MARCH 28, 1988

This is a telecopy facsimile. The original will be sent under separate cover.

Small Bore Supports

| | |
|----------------------|----------------------|
| H-AF-1-SB-007-004-5 | H-CH-2-AB-003-001-3 |
| H-BR-1-SB-003-009-3 | H-CH-2-AB-010-017-3 |
| H-BR-X-AB-052-002-3 | H-CH-2-AB-018-002-3 |
| H-BR-X-AB-076-009-3 | H-CH-X-AB-048-005-3 |
| H-CC-1-AB-033-025-3 | H-CH-X-FB-005-009-3 |
| H-CC-1-AB-077-003-3 | H-CS-1-AB-023-005-3 |
| H-CC-1-RB-004-001-3 | H-CS-1-AB-137-001-3 |
| H-CC-1-RB-017-005-3 | H-CS-1-AB-214-007-3 |
| H-CC-1-RB-056B-006-3 | H-CS-1-AB-239-010-2 |
| H-CC-1-SB-001-021-3 | H-CS-1-RB-013A-001-2 |
| H-CC-1-SB-018-018-3 | H-CS-1-RB-018-034-2 |
| H-CC-1-SB-038-020-3 | H-CS-1-RB-060-012-2 |
| H-CC-1-SB-047B-001-3 | H-CS-1-SB-099-020-2 |
| H-CC-2-AB-027A-001-3 | H-CS-1-SB-061-013-3 |
| H-CC-2-EC-005-009-3 | H-CS-1-SB-068-002-3 |
| H-CC-X-AB-020-011-3 | H-CS-2-AB-039-002-2 |
| H-CC-X-AB-026-009-3 | H-CS-2-AB-070-014-2 |
| H-CH-1-AB-026-002-3 | H-CS-X-AB-018-003-3 |
| H-CH-1-AB-030-005-3 | CS-1-106-701-C42R |
| H-CH-1-AB-037-007-3 | CS-1-114-703-C41R |
| H-CH-1-AB-046-007-3 | H-CT-1-SB-025-019-2 |
| H-CH-1-SB-007-022-3 | H-DD-1-AB-011-003-3 |
| H-CH-1-SB-010A-026-3 | H-DO-1-DG-004-004-3 |
| H-CH-1-SB-020-012-3 | H-DO-1-DG-012-027-3 |
| H-CH-1-SB-025-014-3 | |

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| H-DO-1-DG-032-004-3 | SI-1-027-719-C41R |
| H-FSI-1-2106-14-01-103 | SI-1-108-701-C42R |
| H-FSI-1-2108-01-05-2 | H-SW-1-AB-015-003-3 |
| H-FSI-X-2107-05-02-123-010 | H-SW-1-SB-001A-003-3 |
| H-FSI-X-2617-01-02-2 | H-SW-1-SB-008-001-3 |
| H-GH-1-AB-011-001-3 | H-SW-1-SB-017-012-3 |
| H-GH-X-AB-004-005-3 | H-SW-1-SB-023-009-3 |
| H-GH-X-AB-015A-007-3 | H-SW-1-YD-015-002-3 |
| H-GH-X-AB-018B-008-3 | H-SW-2-AB-027-019-3 |
| H-CH-X-AB-025B-001-03 | H-VA-X-AB-006-005-3 |
| H-GE-X-AB-046-002-3 | H-WP-X-AB-020-003-3 |
| H-GH-X-AB-056-001-3 | H-WP-X-AB-213-005-3 |
| H-GH-X-AB-065-006-3 | |
| H-GH-X-AB-073-011-3 | |
| H-MS-1-RB-006-004-2 | |
| H-MS-1-RB-020-003-2 | |
| H-MS-1-RB-031-007-2 | |
| H-MS-1-SB-012-010-2 | |
| H-PS-1-RB-002-002-2 | |
| H-PS-1-RB-005-036-2 | |
| H-PS-1-SB-004-008-3 | |
| H-RC-1-RB-040-006-2 | |
| RC-1-053-700-C41S | |
| H-RH-1-SB-011-024-2 | |
| H-SF-X-AB-007-002-3 | |
| H-SI-1-RB-032-003-2 | |
| H-SI-1-SB-023A-010-2 | |

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COMPANY, ET AL.) 50-446
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) (Application for
(Comanche Peak Steam Electric) Operating Licenses)
Station, Units 1 and 2)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Response to CASE's Fourth Set of Interrogatories and Requests to Produce "Re: Credibility", in the above-captioned matter were served upon the following persons by express mail (*) or deposit in the United States mail, first class, postage prepaid, this 13th day of March, 1985, or by hand delivery (**) on the 14th day of March, 1985.

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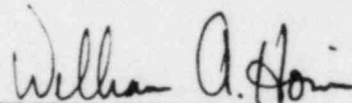
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