

2/4/85

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter of

TEXAS UTILITIES ELECTRIC
COMPANY, et al.

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

FILED

Docket Nos. 50-445 ⁸⁵
and 50-446
85 FEB -7 11:33

(Application for an
Operating License)
BRANCH

CASE'S SECOND SET OF INTERROGATORIES
TO APPLICANTS AND REQUESTS TO PRODUCE

RE: CREDIBILITY

Pursuant to the Board's 12/18/84 MEMORANDUM (Reopening Discovery; Misleading Statement) (pages 9 and 10), CASE (Citizens Association for Sound Energy), Intervenor herein, files this, its Second Set of Interrogatories to Applicants and Requests to Produce Re: Credibility.

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, Cygna, O. B. Cannon, 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. The term "documents" shall be construed in the broad sense of the word and shall include any writings, drawings, graphs, charts, photographs, reports, studies, audits, slides, internal memoranda, informal notes, handwritten notes, tape recordings, procedures, specifications, calculations, analyses, and any other data compilations from which information can be obtained.
4. Each document provided should include a sworn statement of its authenticity.
5. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.
6. Identify the person providing each answer, response, or document.
7. 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.
8. 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).

CASE'S INTERROGATORIES TO APPLICANTS AND REQUESTS TO PRODUCE

1. (a) How long have Applicants been committed to Manufacturers' Standardization Society (MSS) publication MSS SP-58 ("Pipe Hangers and Support-Materials and Design")?
- (b) How long have Applicants been committed to Manufacturers' Standardization Society (MSS) publication MSS SP-69 ("Pipe Hangers and Supports-Selection and Application")?
- (c) Was or is Applicants' commitment to MSS SP-58 and/or MSS SP-69 contained in any document other than Design Specification 2323-MS-46A?
- (d) If the answer to (c) above is yes, list all other such documents.
- (e) Supply copies of the pages from Design Specification 2323-MS-46A which contain Applicants' commitment to MSS SP-58 and/or MSS SP-69 (including the page which contains the Section on Codes and Standards); supply for the original and each revision of MS-46A. (These should be the pages which correspond to pages 3-15 through 3-20 of Revision 5 of MS-46A.)
- (f) Supply copies of the pages from each of the documents listed in (d) preceding which contain Applicants' commitment to MSS SP-58 and/or MSS SP-69 (including the page which contains the section which sets forth the section); supply for the original and each revision of each document listed in (d) preceding.
- (g) Has there ever been any discussion, instructions, or any other communication (either orally or in writing) between Applicants and Cygna Energy Services regarding MSS SP-58 and/or MSS SP-69?

- (h) If the answer to (g) preceding is yes, supply copies of all documents (using the broad definition on page 2, item 3, of this pleading) by Applicants, Cygna, or anyone else regarding this matter. If not already indicated on the document (for instance, in the case of handwritten notes) supply the name of the person whose notes they were, the person to whom the notes were written, and the date of such notes; i.e., include sufficient specific details so that the document being supplied is readily understandable.
- (i) If the answer to (g) preceding is yes, but there are no documents in answer to (h) preceding, provide a brief statement containing the details of such discussion, instructions, or other communication. Include specific details of who was involved in such communication, the date of each such communication, and a brief summary of the substance of such communication. Include sufficient specific details so that the information being supplied is readily understandable.
2. (a) Provide documentation that Applicants have provided Cygna Energy Services with all public documents from these proceedings regarding the Walsh/Doyle allegations.
- (b) Provide:
- (i) a listing of all public documents (including pleadings, Proposed Findings, etc., filed by CASE) which have been provided to Cygna Energy Services (by Applicants or others);
- (ii) all documents (such as cover letters, memoranda, etc.) by which such public documents were provided;

(iii) if the documents were handed to Cygna on site, please so indicate;

(iv) who (name, organization, and title) provided and who (name, organization, and title) received each such public document;

(v) and the date on which each such public document was supplied to Cygna.

3. (a) Provide documentation that Applicants instructed and/or contracted with Cygna Energy Services to address the design quality assurance issue.

(b) Provide:

(i) a listing of all documents (as defined on page 2, item 3, of this pleading), including contracts, which instruct and/or provide details to Cygna Energy Services as to which specific aspects of implementation of design quality assurance they are to address and/or how they are to address them;

(ii) all documents (such as cover letters, memoranda, etc.) by which such documents were provided;

(iii) if the documents were handed to Cygna on site, please so indicate;

(iv) who (name, organization, and title) provided and who (name, organization, and title) received each such document;

(v) and the date on which each such document was supplied to Cygna.

- (c) Provide copies of all contracts, letters of understanding, or other instructions to or from Cygna as to the scope, criteria, protocol, and/or independence of Cygna's review and activities regarding Comanche Peak.
- (d) Was there ever any kind of understanding (written or oral) to the effect that Cygna was to accept Applicants' representations at face value (similar to the agreement regarding J. J. Lipinsky's acceptance at face value of the statements made in Mr. Brandt's affidavit).
- (d) If the answer to (c) above is yes, provide all documents (as defined in item 3, page 2, of this pleading), including contracts, relating to such understanding.

If no documents exist, supply specific details of such understanding, the name(s) (and organization and title) of each person with whom the professor discussed such understanding, a brief summary of all discussions, the date of each such discussion, and any other pertinent details.

- 4. (a) Provide documentation that Applicants have provided the professor discussed in Applicants' Plan with all public documents from these proceedings.
- (b) Provide:
 - (i) a listing of all public documents (including pleadings, Proposed Findings, etc., filed by CASE) which have been provided to the professor (by Applicants or others);

- (ii) a listing of all other documents which have been provided to the professor;
 - (iii) all documents (such as cover letters, memoranda, etc.) by which such documents were provided;
 - (iv) if the documents were handed to the professor on site, please so indicate;
 - (v) who (name, organization, and title) provided each such document;
 - (vi) the date on which each such document was supplied to the professor; and
 - (vii) all documents (as defined on page 2, item 3, of this pleading) listed in (ii) preceding.
- (c) Has the professor ever been on site? If so, provide specific details of such site visit, including a listing of all documents reviewed, to whom he talked, a brief summary of all discussions onsite, the date of each site visit and discussion, and all documents (see definition under item 3, page 2 of this pleading) relating to each site visit.
- (d) Provide copies of all contracts, letters of understanding, or other instructions to or from the professor as to the scope, criteria, protocol, and/or independence of the professor's review and activities regarding Comanche Peak.

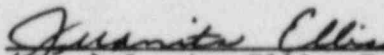
- (e) Was there ever any kind of understanding (written or oral) to the effect that the professor was to accept Applicants' representations at face value (similar to the agreement regarding J. J. Lipinsky's acceptance at face value of the statements made in Mr. Brandt's affidavit)?
- (f) If the answer to (e) above is yes, provide all documents (as defined in item 3, page 2, of this pleading), including contracts, relating to such understanding.

If no documents exist, supply specific details of such understanding, the name(s) (and organization and title) of each person with whom the professor discussed such understanding, a brief summary of all discussions, the date of each such discussion, and any other pertinent details.

5. Provide copies of all damage studies for both Units 1 and 2 of Comanche Peak, and any and all related or similar documents (as defined on page 2, item 3, of this pleading), including but not limited to those which relate to any unacceptable or questionable designs.

This is the second of several such requests which CASE intends to file under this Board Memorandum.

Respectfully submitted,



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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of }{
 }{
TEXAS UTILITIES ELECTRIC }{ Docket Nos. 50-445-1
 COMPANY, et al. }{ and 50-446-1
(Comanche Peak Steam Electric){
 Station, Units 1 and 2) }{

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of
CASE's Second Set of Interrogatories to Applicants and Requests to Produce

Re: Credibility

have been sent to the names listed below this 4th day of February, 1985,
by: Express Mail where indicated by * and First Class Mail elsewhere.

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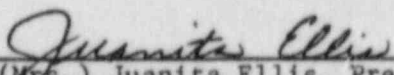
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