

781

RELATED CORRESPONDENCE

2/25/85

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

85 FEB 27 P1:44

In the Matter of

TEXAS UTILITIES ELECTRIC
COMPANY, et al.

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

Docket Nos. 50-445
and 50-446

DOCKETING & SERVICING
BRANCH

(Application for an
Operating License)

CASE'S FOURTH 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 Fourth Set of Interrogatories to
Applicants and Requests to Produce Re: Credibility /1/.

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

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.

/1/ On 2/21/85, CASE sought and was granted additional time to file this
pleading, from 2/21/85 until 2/25/85. CASE also sought and was granted
additional time to file further discovery regarding tests and samples,
from 2/28/85 until 3/4/85. Applicants and NRC Staff had no objections
to these extensions.

DS03

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.

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. Regarding potentially unstable supports:

- (a) Supply a complete list of all supports which Applicants have ever identified as being potentially unstable. In your answer, include the location of each support. Also include a brief description of the history of each such support (i.e., when, why, how, and because of whom it first became potentially unstable; when, why, how, and by whom it was first identified as being potentially unstable; when, why, how, and by whom it was initially corrected; when, why, how, and by whom it was finally corrected); include specific dates, specific names, titles, and organization, and specific details.

Supply the requested information (1) for Unit 1 and common and (2) for Unit 2.

- (b) Supply drawings and calculations for each support listed in (a) preceding, at each step of the process (i.e., as the support was when it was first identified as being potentially unstable, when it was initially corrected, and when it was finally corrected). (If any of this information has already been supplied, please specify the cover letter by which it was supplied, etc., in sufficient detail so that we can identify the information.)
- (c) For each of the supports listed in your answer to (a) preceding,

provide all documentation that Applicants identified such support as potentially unstable, including copies of all deficiency paper (i.e., NCR's, CMC's, DCA's, IR's, and any other paper used by Applicants to identify such deficiency, 10 CFR 50.55(e) reports, etc.). Include all supporting documentation for such deficiency reporting, as well as all documentation relating to the consideration of how to handle or correct the problem, including all documentation relating to the final disposition of the problem.

Also include all documentation that each of the potentially unstable supports were included in trending.

- (d) Which (identify by each support's number) of the supports listed in your answer to (a) preceding fit into each of the following categories?
- (i) box frame with zero-inch gap attached to a single strut or snubber?
 - (ii) single strut with cinched-down U-bolt?
 - (iii) box frames modified by "indexed lugs"?
 - (iv) box frames modified by "additional struts"?
 - (v) box frames modified by cinching down U-bolt?
 - (vi) single struts with U-bolt and a thermal gap?
 - (vii) single struts with U-bolt and a thermal gap, modified by adding supplementary steel to create "stability bumpers"?
 - (viii) single struts with U-bolt and a thermal gap, modified by cinching down U-bolt?
 - (ix) double strutted frames supporting two or more pipes?
 - (x) double strutted frames supporting a single pipe with

uncinched U-bolts?

- (xi) double strutted frames supporting a single pipe with cinched-down U-bolt?
- (xii) double strutted trapeze supports with uncinched U-bolt?
- (xiii) double strutted trapeze supports with cinched-down U-bolt?
- (xiv) multi-strutted trapeze supports with uncinched U-bolt?
- (xv) multi-strutted trapeze supports with cinched-down U-bolt?
- (xvi) multi-strutted box frame?
- (xvii) single snubber with cinched-down U-bolt?
- (xviii) double-strut, double-trunnion with uncinched U-bolt?
- (xix) double-strut, double-trunnion with cinched-down U-bolt?
- (xx) double strut trapeze with box frame?
- (xxi) triple strut box frame?
- (xxii) other configurations not specifically listed in the preceding?

Also supply any additional information which might assist in understanding the configurations discussed in the preceding.

- (e) (1) Have Applicants considered the possibility that there may also be some potentially unstable cable tray supports?
- (2) If the answer to (1) is yes, supply the same information for cable tray supports as was requested in (a), (b), and (c) preceding.
- (f) In regard to Cygna's 2/19/85 letter 84042.035 to Mr. J. B. George, under Subject of Stability of Pipe Supports (copy of which is attached to CASE's 2/25/85 Notification of New and Significant Information and CASE's Supplement to CASE's 10/15/84 Motions and Answer to Applicants' Motion for Summary Disposition Regarding Stability of Pipe Supports, which is being sent in the same

mailing with this pleading):

- (1) Supply a list of the supports which Cygna identified on page 7 (last paragraph) as:
 - (i) the 37 supports which, in the total absence of the pipe, are stable;
 - (ii) the 124 supports which, in the absence of the pipe, would be unstable, but which Cygna considers to possess sufficient positive attachment to the pipe to ensure stability; and
 - (iii) the 65 supports which Cygna considers to be potentially unstable.
- (2) Supply the drawings and calculations which Cygna reviewed for each support listed in (1) preceding. (If these are already included in the Cygna Reports, please indicate where they can be found in the Report. If these are the same drawings and/or calculations supplied by Applicants in their answer to (b) preceding, please so indicate. Be specific.)
- (3) Supply all drawings, calculations, or other documents (as defined on page 2, item 3, of this pleading) generated by Cygna or its agents in Cygna's review of each support listed in (1) preceding. (If this has already been provided, please identify, for each support, the specific document provided and the date and Cygna identification number for each such cover letter by which it was provided.)
- (4) Did Cygna attempt to ascertain whether or not Applicants had promptly identified and corrected the problem of potential instability?

- (5) Did Cygna attempt to ascertain whether or not Applicants had trended each of the supports which were potentially unstable?
- (6) If the answer to (4) and/or (5) preceding is yes, for each of the supports listed in your answer to (1) preceding, provide all documentation which Cygna reviewed which indicated that Applicants identified such support as potentially unstable, including copies of all deficiency paper (i.e., NCR's, CMC's, DCA's, IR's, and any other paper used by Applicants to identify such deficiency, 10 CFR 50.55(e) reports, etc.). Include all supporting documentation for such deficiency reporting, as well as all documentation relating to the consideration of how to handle or correct the problem, including all documentation relating to the final disposition of the problem.

Also include all documentation that each of the potentially unstable supports were included in trending.

(If any of this information has already been provided in response to (c) preceding, please identify specifically which such information reviewed by Cygna has already been supplied.)

- (7) If the answer to (4) or (5) preceding is yes, what are Cygna's current conclusions regarding the adequacy of Applicants' prompt identification and correction of the problem of instability, as well as the adequacy of Applicants' trending and whether or not such trending accomplishes the purpose of promptly identifying trends which may adversely affect quality?
- (8) Which (identify by each support's number) of the supports

reviewed by Cygna fit into each of the following categories (this information is not clear from Cygna's listing at the top of page 8):

- (i) box frame with zero-inch gap attached to a single strut or snubber?
- (ii) single strut with cinched-down U-bolt?
- (iii) box frames modified by "indexed lugs"?
- (iv) box frames modified by "additional struts"?
- (v) box frames modified by cinching down U-bolt?
- (vi) single struts with U-bolt and a thermal gap?
- (vii) single struts with U-bolt and a thermal gap, modified by adding supplementary steel to create "stability bumpers"? (Answer appears to be 2; is this correct?)
- (viii) single struts with U-bolt and a thermal gap, modified by cinching down U-bolt?
- (ix) double strutted frames supporting two or more pipes?
- (x) double strutted frames supporting a single pipe with uncinched U-bolts?
- (xi) double strutted frames supporting a single pipe with cinched-down U-bolt?
- (xii) double strutted trapeze supports with uncinched U-bolt? (Answer appears to be 3; is this correct?)
- (xiii) double strutted trapeze supports with cinched-down U-bolt?
- (xiv) multi-strutted trapeze supports with uncinched U-

bolt?

(xv) multi-strutted trapeze supports with cinched-down U-bolt?

(xvi) multi-strutted box frame? (Answer appears to be 8; is this correct?)

(xvii) single snubber with cinched-down U-bolt?

(xviii) double-strut, double-trunnion with uncinched U-bolt?

(xix) double-strut, double-trunnion with cinched-down U-bolt? (Answer appears to be 1; is this correct?)

(xx) double strut trapeze with box frame? (Answer appears to be 2; is this correct?)

(xxi) triple strut box frame? (Answer appears to be 1; is this correct?)

(xxii) other configurations not specifically listed in the preceding?

Also supply any additional information which might assist in understanding the configurations discussed in the preceding.

- (9) Do Applicants agree that the copy of Cygna's 2/19/85 letter 84042.035 to Mr. J. B. George, under Subject of Stability of Pipe Supports, which was attached to CASE's 2/25/85 Notification of New and Significant Information and CASE's Supplement to CASE's 10/15/84 Motions and Answer to Applicants' Motion for Summary Disposition Regarding Stability of Pipe Supports (which is being sent in the same mailing with this pleading), is an authentic and correct copy of the letter received by Applicants from Cygna (with the

exception of the date on which CASE received the letter, which has been hand-written in the upper right-hand corner of the letter)?

- (10) If the answer to (9) preceding is no, supply an authentic and correct copy of such letter.
- (11) Does Cygna consider the 226 pipe supports which they reviewed as part of its Phases 2, 3 and 4 review to be a representative sample of the pipe supports at Comanche Peak?
- (12) Do Applicants consider the 226 pipe supports which Cygna reviewed as part of its Phases 2, 3 and 4 review to be a representative sample of the pipe supports at Comanche Peak?
- (13) If the answer to (12) preceding is no, please explain in detail Applicants' rationale for having chosen the particular systems which they had Cygna review to help alleviate the Board's concerns about the design of Comanche Peak.

2. Regarding A500 Steel:

- a. Provide responses to the following, which refer to the Affidavit of John C. Finneran, Jr. Regarding A500 Tube Steel, which was attached to Applicants' 4/11/84 Response to Partial Initial Decision Regarding A500 Steel:

- (1) Affidavit beginning at bottom of page 2, continuing on page 3:
 - (i) Provide documentation that Applicants recognized the reduction in yield strength.
 - (ii) Who were the people (supply individuals' names, titles, and organizations) who recognized the reduction in yield strength?

- (iii) Provide affidavits from the individuals listed in (ii) preceding that supports Applicants' statement at the top of page 3 "that several factors in their pipe support designs assured that no adverse safety impact would result from their use of the original yield strengths for A500 tube steel."
 - (iv) Include in the affidavits discussed in (iii) preceding the credentials of each such individual at the time their decisions were made.
 - (v) Provide copies of all documents referred to by Applicants which contain the "several factors in their pipe support designs" which "assured that no adverse safety impact would result from their use of the original yield strengths for A500 tube steel."
- (2) Affidavit at page 4: Supply calculations and all other documentation which shows a correlation between the 1/16" deflection criteria and stress in the tube steel which Applicants claim in most cases will limit the stress in the supports.
- (3) Affidavit at page 4: Supply calculations and all other documentation which shows the stress limits in Hilti bolts will correlate with stresses in the tube steel.
- (4) Affidavit at page 5: Supply calculations, drawings, and all other documentation which would indicate that the Applicants modified supports while applying "level B stress allowables in assessing the more severe level C loads."
- (5) (1) Affidavit at page 5, last paragraph, continued on page 6: Supply copies of the test data, which Applicants

state is "provided to Applicants by fabricators of steel materials who perform material tests for various properties, including yield strengths, on each production run of material," which would apply after the material has been welded to.

- (ii) Do Applicants consider that the sample of pipe supports discussed at the top of page 6 was a randomly selected representative sample?
- (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.
- (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?
- (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?
- (vi) Provide all documentation that the supports assessed by Applicants were worst case supports.
- (vii) Provide a list of all pipe supports included in the sample of pipe supports discussed at the top of page 6.
- (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."
- (ix) Provide copies of all documentation (calculations,

drawings, etc.) for each of the pipe supports listed in your answer to (vii) preceding.

(6) (i) Do Applicants consider that the sample of pipe supports discussed in the middle paragraph on page 6 was a randomly selected representative sample?

(ii) Provide documentation of the specific criteria which Applicants originally used in selecting the sample of pipe supports discussed in the middle paragraph on page 6.

(iii) Who (name, title, organization at the time) determined the specific criteria which Applicants originally used in selecting the sample of pipe supports discussed in the middle paragraph on page 6?

(iv) Who (name, title, organization at the time) actually selected the specific pipe supports included in the sample of pipe supports discussed in the middle paragraph on page 6?

(v) Provide all documentation that the supports assessed by Applicants were worst case supports.

(vi) Provide a list of all pipe supports included in the sample of pipe supports discussed in the middle paragraph on page 6.

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

(7) Affidavit at page 7: Supply the support numbers, calculations, and drawings for all supports which required modification in the vendor certification process due to the

tube steel member's being overstressed.

- (8) Affidavit at page 8: Provide documentation from ASME or the ASME code that supports Applicants' that there will be only a "10% reduction in yield strength" when the tested tube steel member's yield value is above the "42 ksi yield strength value originally published."
 - (9) Affidavit at page 8: Provide all documentation of the basis for the assurance which Applicants claim to have that the tube steel material which is tested at 56.3 ksi will not have a yield strength value of 36 ksi (or less) after welding.
- (b) The following relate to page 5 of Applicants' 4/11/84 Response to Partial Initial Decision Regarding A500 Steel, page 5, Footnote 6:
- (1) Provide documentation showing the contract dates for all piping on which tube steel supports are used.
 - (2) Provide documentation showing the original contract dates for ITT Grinnell, NPSI, and PSE for all supports within their scopes and all supports that were transferred from one organization's scope to another's.
 - (3) Provide documentation showing dates of an approval to revision 0 to the design criteria for NPSI, ITT Grinnell, and PSE for Comanche Peak.
 - (4) Provide documentation that there was mutual consent of the owner, manufacturer, and installer that Applicants need not consider ASME Code Case N-71-10 on those supports designed, ordered, and fabricated after May 11, 1981.

3. Regarding AWS vs. ASME:

- a. With regard to Affidavit of J. C. Finneran, R. C. Iotti and J. D.

Stevenson Regarding Allegations Involving AWS vs. ASME Code Provisions, Attachment 1 to Applicants' 5/17/84 Motion for Summary Disposition of Certain CASE Allegations Regarding AWS and ASME Code Provisions Related to Design Issues:

- (1) Beginning on page 4 of the Affidavit, Applicants' affiants discuss at some length the provisions of Appendix XVII, paragraph 221(c) of Section III of the 1974 ASME Code:
 - (i) Where is it stated in ASME that this is a compensatory requirement?
 - (ii) Isn't it a fact that Appendix XVII, Paragraph 221(c) was subsequently deleted in the Winter 1978 Addenda?
 - (iii) Isn't it also a fact that Applicants adopted the deletion of Appendix XVII, Paragraph 221(c)?
 - (iv) What was the purpose of Applicants' discussion of Appendix XVII, Paragraph 221(c), in their Affidavit, and how was it relevant to the issue under discussion?
 - (v) Why didn't Applicants' affiants state that Appendix XVII, Paragraph 221(c), had been subsequently deleted and that such deletion has been adopted by the Applicants?

4. Regarding axial restraints:

- a. On page 39 of the SIT Report (which was conducted October 13-December 2, 1982 and January 18, 1983), it is stated that:

"Subsequent discussions with the Applicant indicated that this rotational restraint had also been identified during the Applicant's normal design review and that the pipe stress analysis was being modified to consider this rotational restraint."

However, Applicants have now changed their position on this (as indicated on pages 3 and 4 of the Affidavit of Robert C. Iotti and

John C. Finneran, Jr. Regarding Consideration of Force Distribution in Axial Restraints, which was attached to Applicants' 7/9/84 Motion for Summary Disposition Regarding Allegations Concerning Consideration of Force Distribution in Axial Restraints.

Regarding this:

- (1) What has changed since Applicants told the SIT that they were going to modify their pipe stress analysis to consider this rotational restraint? Provide specific details.
- (2) Provide all documents (as defined on page 2, item 3, of this pleading) which indicate that Applicants had advised the NRC of Applicants' change in position regarding this prior to 7/9/84.

5. Regarding damping factors:

- a. Regarding the Affidavit of Robert C. Iotti Regarding Alleged Errors Made in Determining Damping Factors for OBE and SSE Loading Conditions, which was attached to Applicants' 5/16/84 Motion for Summary Disposition Regarding Alleged Errors Made in Determining Damping Factors for OBE and SSE Loading Conditions:

- (1) Affidavit at page 4: Dr. Iotti discusses a statement in the SIT Report at page 48:

"The Special Inspection Team concluded that these response spectra characteristics, together with the fact that the SSE damping value of 4 percent is twice the OBE damping value of 2 percent led to the condition expressed in Mr. Doyle's concern."

Dr. Iotti then states that "The SIT was not clear that the use of 2 and 4 percent damping factors in the analysis of OBE and SSE conditions to which it refers was with respect to

that aspect of the analysis in which closely spaced modal responses are combined using a coupling factor."

(i) When (specific date) did Dr. Iotti begin working on this issue for Comanche Peak?

(ii) What was the basis for Dr. Iotti's conclusion that "The SIT was not clear . . ." Did someone tell him? If so, who (name, title, and organization), and what was the basis for such individual's conclusion? Did Dr. Iotti discuss this matter with anyone on the SIT or with the NRC? Did Dr. Iotti assume that the SIT had meant to say something else in the SIT Report? Give specific details as to his basis.

(iii) Provide all documents (as defined on page 2, item 3, of this pleading) which indicate that Applicants or any of their agents informed the SIT or the NRC that "The SIT was not clear . . ." regarding this matter, as well as all documents relating to the SIT's or the NRC's response(s).

6. Regarding Differential Displacements:

a. Regarding the Affidavit of R. C. Iotti and J. C. Finneran, Jr.

Regarding Differential Displacement of Large Frame Pipe Supports, Attachment 1 to Applicants' 6/22/84 Motion for Summary Disposition of CASE Allegations Regarding Differential Displacement of Large-Framed, Wall-to-Wall and Floor-to-Ceiling Pipe Supports:

On page 7 of the Affidavit, Applicants' affiants discuss the

"prompt attention" the problem received:

- (1) Provide all documents (as defined on page 2, item 3, of this pleading) indicating that the problem received prompt attention, including all deficiency paper and its disposition.
- (2) Provide the justification for proceeding with construction of these supports even though they were known to be "not in strict compliance with the PSE guideline" (i.e., what procedure gives Applicants the authority to ignore such guidelines, on whose authority was such a decision made (name, title, organization), etc.). (We have read what is said in Applicants' Affidavit, so you need not repeat what is said there in answer to this question.)
- (3) Why should the Licensing Board believe that this problem would have been adequately resolved if the SIT had not raised the issue?
- (4) In Applicants' Affidavit, they state that "only these four supports were in violation of the guideline." They further state (page 8) that Applicants (at the recommendation of the SIT) made the guideline regarding this issue applicable to ITT and NPSI.

If the same PSE Guideline had also been in effect prior to that time for ITT and NPSI, would there have been additional ITT and NPSI supports which would have been in violation of the guideline?

- (5) Provide all documents (as defined on page 2, item 3, of this pleading) in support of your answer to (4) preceding.
- (6) Have Applicants or any of their employees (as defined on

pages 1 and 2, item 2, of this pleading) subsequently discovered additional supports which would have been in violation of the PSE Guidelines in effect during the time period discussed in the preceding (i.e., 1981-1982)?

(7) If the answer to (6) preceding is yes, supply a list of, and complete details and all documents regarding, each such support.

(8) On page 26 of the SIT Report (first full paragraph), it states:

"During the course of the inspection, the Applicant informed the Special Inspection Team that these supports would be unable to withstand differential seismic displacements and were being redesigned."

Considering this statement, what was the basis for Applicants' belief (discussed on page 7 of the Affidavit) that "the designs, although not in strict compliance with the PSE guideline, were adequate"?

(9) Who (name, title, organization) made the statement (quoted in (8) preceding) to the SIT? Is this individual (or individuals) still employed at Comanche Peak? If not, supply such individual(s) last known address and telephone number.

(10) Provide all documents which led such individual(s) to the conclusion that "these supports would be unable to withstand differential seismic displacement."

(11) Provide all documents (including detailed analyses) which reflected that "similar supports designed by ITT and NPSI" "were adequate including consideration of differential seismic displacement" (as stated on page 8 of Applicants' Affidavit).

7. Regarding Richmond Inserts:

a. Answer the following questions regarding the Affidavit of John C. Finneran, Jr., Robert C. Iotti and R. Peter Deubler Regarding Design of Richmond Inserts and Their Application to Support Design (Attachment 1 to Applicants' 6/2/84 Motion for Summary Disposition Regarding Design of Richmond Inserts and Their Application to Support Design):

- (1) On page 27 of the Affidavit, a bolt interaction equation is given. Provide all documents (as defined on page 2, item 3, of this pleading) which gives the basis for this equation (i.e., design guidelines, specifications, procedures, codes, standards, recognized authorities, etc.).
- (2) With further reference to (1) preceding, why isn't the tensile stress due to bending added to the direct tensile stress T?
- (3) On page 25 of the Affidavit, Applicants' affiants discuss an interaction value of 1.75. Where else within the industry is an interaction value greater than 1 considered to be acceptable? Provide all documents (as defined on page 2, item 3, of this pleading) which support the acceptable of an interaction value greater than 1 (i.e., design guidelines, specifications, or procedures other than for Comanche Peak, codes, standards, recognized authorities, etc.).

8. Regarding the upper lateral restraint:

- a. Isn't it true that LOCA was not considered in the original design of the upper lateral restraint?
- b. What was Applicants' rationale for not considering LOCA in the

- original design of the upper lateral restraint?
- c. Provide all documents (as defined on page 2, item 3, of this pleading) regarding your answer to b. preceding.
9. Regarding cable tray supports:
- a. Are cable tray supports/hangers considered to be safety-related?
 - b. Isn't it true that all cable tray supports at Comanche Peak have one original generic design?
 - c. Isn't it true that the effects of a loss-of-coolant accident (LOCA) were not considered in the original generic design of cable tray supports?
 - d. What was Applicants' rationale for not considering the effects of a LOCA in the original generic design of cable tray supports?
 - e. Have Applicants now considered LOCA in the generic design of cable tray supports?
 - f. If Applicants have considered LOCA in the generic design of cable tray supports, provide all documents which confirm this.
 - g. Isn't it true that Applicants have neglected to consider the reduction of the yield point during a LOCA on any steel member on a cable tray support within the containment?
 - h. What was Applicants' rationale for neglecting to consider the reduction of the yield point during a LOCA on any steel member on a cable tray support within the containment?
 - i. Were the samples of cable tray supports which Cygna reviewed representative of the cable tray supports within the containment?
 - j. Isn't it correct that the same generic design was used for cable tray supports within the containment as was used for the cable tray supports which Cygna reviewed?
 - k. Isn't it correct that the FSAR requires that cable tray supports

within the containment must consider the effects of LOCA?

- l. Isn't it correct that Applicants have not considered the effects of multimodal responses in the design of cable tray supports?
- m. For what other systems or components have Applicants not considered the effects of multimodal responses?
- n. Isn't it correct that Applicants did not use the peak of the response spectra curve in their reanalysis in response to Cygna's questions in Phases 1 and 2?
- o. If the answer to n. preceding is yes, what was Applicants' rationale for not doing so?
- p. Has any technical audit by Gibbs & Hill, TUSI, or any other agent of Applicants identified that the Applicants have not utilized the 1.5 multimodal response factor?
- q. If the answer to p. preceding is no, what is Applicants' explanation for this?
- r. What have Applicants done since this was brought to Applicants' attention by CASE Witness Mark Walsh (through the May 1984 hearings) insofar as checking to see whether Applicants have also failed to utilize the 1.5 multimodal response factor for systems and components other than cable tray supports? Provide all documents (as defined on page 2, item 3, of this pleading) regarding this.
- s. Have any technical audits or any other kind of audit, report, review, etc., been done to determine this? If so, provide all such documents (as defined on page 2, item 3, of this pleading).
- t. What was Applicants' rationale for utilizing a normalization process (see Tr. 13,179/11-18) in the design of cable tray

supports which did not include the effects due to the SSE condition on the Hilti bolts?

- u. What have Applicants done to verify that the Hilti bolts will meet manufacturers' requirements (i.e., a factor of safety of 4) under an SSE loading condition? Provide all documents regarding this.
 - v. What calculation has been used to verify the Hilti bolts will meet the manufacturers' standard of a factor of safety of 4 under an SSE loading condition? Provide all documentation of this.
 - w. On what other systems and/or components within the plant did Applicants or their agents utilize this normalization process? Provide all documents regarding this.
 - x. Isn't it correct that Applicants utilized a factor of 1.6 Fy under the SSE loading condition in the generic designs for cable tray supports?
 - y. Isn't it correct that Applicants' FSAR states that steel structures within the containment cannot have stresses above .9 Fy under the SSE loading condition in tension and bending?
 - z. Since steel structures within the containment cannot have stresses above .9 Fy under the SSE loading condition (according to Applicants' FSAR) in tension and bending, what was Applicants' rationale for utilizing the generic designs for cable tray supports which, when exercising Applicants' normalization process, would not exercise the limitation of stress under an SSE loading condition?
 - aa. What did Applicants do to those cable tray supports which were overstressed as discussed in the May 1984 hearings? Provide all documents regarding this.
10. Supply all documents (as defined on page 2, item 3, of this pleading)

relied upon in any way in the testimony of Applicants' witnesses who testified during the February and March 1984 welding hearings (both in the welding hearings and in the intimidation hearings regarding Henry or Darlene Stiner). (If there is any doubt as to what specific documents we are requesting, contact Juanita Ellis for specific details.)

11. With regard to Applicants' welding witnesses (who testified either in the September 1982 or February/March 1984 welding hearings, or had depositions taken or testified in the intimidation hearings regarding Henry or Darlene Stiner), provide the following information for each Applicants' witness:
 - a. How many hours did Applicants' or Brown & Root's attorneys spend with the witness? How long was each session? Give a specific time frame, including specific dates and times of day or night.
 - b. Was the witness given any assignments in preparation of testifying?
 - c. During the time when Applicants' or Brown & Root's attorneys were preparing the witness, were the following individuals also present:
 - (1) Ron Tolson?
 - (2) Tom Brandt?
 - (3) W. E. Baker?
 - (4) David Chapman?
 - (5) Antonio Vega?
 - (6) Any of the witness's superiors (if so, supply the name(s), title(s), and organization(s) of each)?
 - (7) Anyone else (if so, supply the name(s), title(s), and

organization(s) of each)?

- d. How much time did the witness spend at work in preparing his testimony? How much overtime did the witness spend in preparing his testimony? How much time on week-ends or during his time off from work did the witness spend in preparing his testimony?
- e. Provide for inspection and copying copies of the witness's time sheets (or whatever means is used to indicate the date, time, and number of hours worked) for the three months before and the three months after each time the witness testified.
- f. How was it decided that the witness should testify (i.e., did he come to someone and say he wanted to testify, was he asked by someone to testify, was he told by someone that he would testify, etc.)? Give specific details, including who (name, title, organization) the witness individually talked to, who he talked to subsequently, etc.
- g. Provide all documents (as defined on page 2, item 3, of this pleading) regarding your answer to f. preceding.
- h. Has the witness had a change in shifts, position, pay scale, etc., between July 1, 1982, and the present? Supply complete details, including all documents (as defined on page 2, item 3, of this pleading, and including specifically job performance ratings, counseling reports, etc.) regarding all such changes. Include specifically information regarding the status of Cliff Brown.
- i. Has the witness quit or been terminated since he testified? If so, supply complete details, including all documents regarding this (including job performance ratings, termination slips, counseling reports, exit interviews, etc.). Also include the witness's last known address and telephone number. Include

specifically information regarding the status of Cliff Brown.

- j. Supply all documents regarding where the witness worked, who his immediate superior was, what crew he was on, during the time Henry and Darlene Stiner worked at Comanche Peak. Also state how the witness's job changed from his former position.
- k. Which other welding witnesses were on the same crew as the witness at the time, or within six months of the time, the witness testified? Identify each such other witness by name. Also specify the times during which each other welding witness was on the same crew as the witness.
- l. Was the witness promised, or was it implied that he would receive, anything if he testified or for his testimony (for instance, free representation by Applicants' or Brown & Root's counsel if he got into trouble, transfer to the work he wanted to do, a raise, extra vacation benefits, extra time off, other long-term benefits, etc.)? If so, what specifically was he promised, or was it implied that he would receive? Was the promise or implication fulfilled? Give all relevant details. Provide all documents (as defined on page 2, item 3, of this pleading) relating to this.
- m. Were there any notes, tapes, or other documents (as defined on page 2, item 3, of this pleading) of meetings, discussions, etc., regarding the witness's preparation for testifying?
- n. If the answer to m. preceding is yes, provide all such documents.
- o. If a copy of his resume was not supplied at the time he testified, supply a copy now.
- p. Has the witness ever spent any time in jail? Does the witness have a criminal record? If the answer is yes, give specific

details and supply all documents (as defined on page 2, item 3, of this pleading) regarding this. If the answer is no, describe what specific steps Applicants took to ascertain this; provide all documents regarding this.

- q. Has the witness ever been involved in any way with drugs, either onsite or offsite? Has the witness ever spent any time in jail for drug use or the sale of drugs? Does the witness have a criminal record regarding the use or sale of drugs? Was the witness terminated regarding the use or sale of drugs? If the answer to any of the preceding questions is yes, give specific details and supply all documents (as defined on page 2, item 3, of this pleading) regarding this. If the answer is no, describe what specific steps Applicants took to ascertain this; provide all documents regarding this.

12. With regard to all other of Applicants' witnesses (who had depositions taken or testified in the intimidation hearings, or testified in the other portion of the hearings, or filed affidavits including but not limited to regarding the Walsh/Doyle issues) provide the following information for each Applicants' witness (if he/she testified more than once, for each time he/she testified, if applicable):

- a. How many hours did Applicants' or Brown & Root's attorneys spend with the witness? How long was each session? Give a specific time frame, including specific dates and times of day or night.
- b. Was the witness given any assignments in preparation of testifying?
- c. During the time when Applicants' or Brown & Root's attorneys were preparing the witness, were the following individuals also present:

- (1) Ron Tolson?
 - (2) Tom Brandt?
 - (3) W. E. Baker?
 - (4) David Chapman?
 - (5) Antonio Vega?
 - (6) Any of the witness's superiors (if so, supply the name(s), title(s), and organization(s) of each)?
 - (7) Anyone else (if so, supply the name(s), title(s), and organization(s) of each)?
- d. How much time did the witness spend at work in preparing his testimony? How much overtime did the witness spend in preparing his testimony? How much time on week-ends or during his time off from work did the witness spend in preparing his testimony?
- e. Provide for inspection and copying copies of the witness's time sheets (or whatever means is used to indicate the date, time, and number of hours worked) for the three months before and the three months after each time the witness testified.
- f. How was it decided that the witness should testify (i.e., did he come to someone and say he wanted to testify, was he asked by someone to testify, was he told by someone that he would testify, etc.)? Give specific details, including who (name, title, organization) the witness individually talked to, who he talked to subsequently, etc.
- g. Provide all documents (as defined on page 2, item 3, of this pleading) regarding your answer to f. preceding.
- h. Has the witness had a change in shifts, position, pay scale, etc., between July 1, 1982, and the present? Supply complete details,

including all documents (as defined on page 2, item 3, of this pleading, and including specifically job performance ratings, counseling reports, etc.) regarding all such changes. Include specifically information regarding the status of Gordon Purdy, Thomas Brandt, Antonio Vega, David Chapman, Ronald Tolson, the "somewhat knowledgeable" engineers referred to by John Finneran.

- i. Has the witness quit or been terminated since he testified? If so, supply complete details, including all documents regarding this (including job performance ratings, termination slips, counseling reports, exit interviews, etc.). Also include the witness's last known address and telephone number. Include specifically information regarding the status of Gordon Purdy, Thomas Brandt, Antonio Vega, David Chapman, Ronald Tolson, the "somewhat knowledgeable" engineers referred to by John Finneran.
- j. Supply all documents regarding where the witness worked, who his immediate superior was, what crew he was on, how the witness's job differed from his previous job.
- k. Was the witness promised, or was it implied that he would receive, anything if he testified or for his testimony (for instance, free representation by Applicants' or Brown & Root's counsel if he got into trouble, transfer to the work he wanted to do, a raise, extra vacation benefits, extra time off, other long-term benefits, etc.)? If so, what specifically was he promised, or was it implied that he would receive? Was the promise or implication fulfilled? Give all relevant details. Provide all documents (as defined on page 2, item 3, of this pleading) relating to this.
- l. Were there any notes, tapes, or other documents (as defined on page 2, item 3, of this pleading) of meetings, discussions, etc.,

regarding the witness's preparation for testifying?

- m. If the answer to l. preceding is yes, provide all such documents.
 - n. If a copy of his resume was not supplied at the time he testified, supply a copy now.
 - o. Has the witness ever spent any time in jail? Does the witness have a criminal record? If the answer is yes, give specific details and supply all documents (as defined on page 2, item 3, of this pleading) regarding this. If the answer is no, describe what specific steps Applicants took to ascertain this; provide all documents regarding this.
 - p. Has the witness ever been involved in any way with drugs, either onsite or offsite? Has the witness ever spent any time in jail for drug use or the sale of drugs? Does the witness have a criminal record regarding the use or sale of drugs? Was the witness terminated regarding the use or sale of drugs? If the answer to any of the preceding questions is yes, give specific details and supply all documents (as defined on page 2, item 3, of this pleading) regarding this. If the answer is no, describe what specific steps Applicants took to ascertain this; provide all documents regarding this.
13. Is James Stembridge still employed at Comanche Peak? If the answer is no, did he quit or was he terminated? If the answer is no, provide all details and documents (as defined on page 2, item 3, of this pleading), including specifically (but not limited to) job performance ratings, termination slips, counseling reports, exit interviews, etc. Also provide his last known address and telephone number.
14. Provide copies of Henry Stiner's personnel records, including but not

limited to certifications, eye examinations, job performance ratings, termination slip, counseling reports, exit interviews, etc.

(Applicants will be provided with a signed notarized release by Henry Stiner.)

15. Provide copies of Darlene Stiner's personnel records, including but not limited to certifications, eye examinations, job performance ratings, termination slip, counseling reports, exit interviews, etc.

(Applicants will be provided with a signed notarized release by Darlene Stiner.)

16. Supply documentation that Armund Braumuller had been a welder for 28 years at the time he testified in the March 1984 hearings.

17. Isn't it a fact that Applicants do not routinely check to ascertain whether or not an employee or a potential employee has a criminal record or is involved in the use or sale of drugs?

18. Isn't it a fact that Applicants normally do not check to ascertain whether or not an employee or a potential employee has a criminal record or is involved in the use or sale of drugs unless they plan to attempt to discredit him, for instance if he/she is testifying in a DOL case against Brown & Root or the Applicants, or in an operating license hearing?

19. If the answer to 17 or 18 preceding is no, answer the following questions regarding Henry Stiner:

- a. When and how did Applicants first become aware that Mr. Stiner had a criminal record?

- b. Provide all documents (as defined on page 2, item 3, of this pleading) which support your answer to a. preceding.

20. If the answer to 17 or 18 preceding is no, answer the following questions regarding William Dunham:

- a. When and how did Applicants first become aware that Mr. Dunham had a criminal record?
 - b. Provide all documents (as defined on page 2, item 3, of this pleading) which support your answer to a. preceding.
21. If the answer to 17 or 18 preceding is no, provide details, and all documents (as defined on page 2, item 3, of this pleading) regarding, what techniques and methods Applicants usually employ to check out whether or not an employee has a criminal record or has been involved in the use or sale of drugs. Is there a procedure which sets forth Applicants' policy in this regard; if so, provide it (original and all revisions).
22. Provide the basis and all documents (as defined on page 2, item 3, of this pleading) for your answer to 21. preceding.
23. During a conference call (CASE believes it was 9/30/84), the Licensing Board ordered Applicants and NRC Staff to respond to the substantive portions of CASE's interrogatories and requests to produce regarding drug use at Comanche Peak. Provide Applicants' response now.
24.
 - a. Isn't it true that virtually all of the supports in the North Yard Tunnel have now been changed due to design changes?
 - b. Isn't it true that many or most of the changes referenced in a. preceding were made to floor-to-ceiling hangers?
 - c. Isn't it true that many or most of the changes referenced in a. preceding were to change the hangers so that they now have slip joints?
 - d. Isn't it true that many or most of the changes referenced in a. preceding were made in response to the Walsh/Doyle allegations?

- e. Isn't it true that the change to slip joints was one of the recommendations made by Messrs. Walsh and/or Doyle in the operating license proceedings?
- f. Provide a list of all supports/hangers in the North Yard Tunnel which have been modified or redesigned; include in your answer whether or not such supports are safety-related, the class of each support, and the system of which each support is a part.
- g. Provide drawings and calculations (the ones just prior to the change, and the ones where the change was made) for each support/hanger listed in f. preceding. Also provide any other documents (as defined on page 2, item 3, of this pleading) relating to such change.
- h. For each support/hanger listed in f. preceding, state exactly how the support was changed and the specific reason for the change.
- i. (i) How many other hangers/supports have been modified or redesigned in response to the Walsh/Doyle allegations?
(ii) Supply a list of all such supports, each support's location, the system each support is part of, whether or not each support is safety-related, and the class of each support, and the system of which each support is a part.
(iii) Provide drawings and calculations (the ones just prior to the change, and the ones where the change was made) for each support/hanger listed in (ii) preceding. Also provide any other documents (as defined on page 2, item 3, of this pleading) relating to such change.
(iv) For each support/hanger listed in (ii) preceding, state exactly how the support was changed and the specific reason for the change.

25. a. List each and every method which has ever been used by Applicants to identify nonconforming conditions. For each such method, include in your answer:

- (1) Whether or not the method is still being used.
- (2) The time period during which the method was/has been used.
- (3) Whether the method is used for construction or for design, or both.
- (4) Whether or not the method is trended.
- (5) The time period during which the method was/has been trended.
- (6) Provide all documents (as defined on page 2, item 3, of this pleading) setting forth the criteria for which method is to be used. Include the original and all revisions of each specification, procedure, instruction, memo, etc. relating to this.
- (7) Provide all documents (as defined on page 2, item 3, of this pleading) which substantiates that each method has been/is being trended.
- (8) How many documents (NCR's, DDR's, etc.) have been generated over the life of the plant for each such method?
- (9) How many items are still open at the present time of documents generated for each such method?
- (10) Include the various punch lists in your responses to items 1 through 9 preceding.

b. In the past, have non-conforming designs been issued to the field

and constructed before the original design organization completes its review of changes (such as those made by CMC, DCA, etc.)?

(1) If the answer is yes, is this still being done?

(2) If the answer to (1) preceding is no, provide all documents (as defined on page 2, item 3, of this pleading) which relates to this change of policy, procedure, or practice.

- c. Provide all documentation that Cygna was to have reviewed the adequacy of Applicants' implementation of design QA. Give specific and complete details.
- d. Provide a brief summary of Applicants' current position regarding the identification and correction of non-conforming designs. Give specific and complete details.
- e. If it has not already been provided in response to another question, provide all documentation of Applicants' present position regarding the handling of non-conforming designs, including the identification and correction of such non-conforming designs.
- f. Provide copies of all CAR's and SDAR's (and all other documents which may be used to identify significant deficiencies or potentially significant deficiencies) and all documents which relate to each.
- g. Provide copies of all CAR and SDAR logs (and logs for all other documents which may be used to identify significant deficiencies).
- h. Provide copies of all procedures, instructions, memos, etc. which set forth how the determination is made as to: whether or not a deficiency is significant, when it is to be reported to the NRC,

who is to made such determinations, etc. Provide the original and all revisions for each such document.

- i. Who (name, title, organization) is authorized to made the determinations discussed in h. preceding? Who (specifically) has been authorized to made such determinations in the past. Include in your answer the specific time periods during which each such individual was so authorized.
- j. List each and every method which has ever been used by Applicants or their employees (as defined on pages 1 and 2, item 2, of this pleading) to make design changes. For each such method, include in your answer:
 - (1) Whether or not the method is still being used.
 - (2) The time period during which the method was/has been used.
 - (3) Whether the method is used for construction or for design, or both.
 - (4) Whether or not the method is trended.
 - (5) The time period during which the method was/has been trended.
 - (6) Provide all documents (as defined on page 2, item 3, of this pleading) setting forth the criteria for which method is to be used. Include the original and all revisions of each specification, procedure, instruction, memo, etc. relating to this.
 - (7) Provide all documents (as defined on page 2, item 3, of this pleading) which substantiates that each method has been/is being trended.
 - (8) How many documents have been generated over the life of

the plant for each such method?

(9) How many items are still open at the present time of documents generated for each such method?

(10) Include the various punch lists in your responses to items 1 through 9 preceding.

26. Provide for inspection and copying all invoices or other documentation of purchase for all pencil grinders which were purchased for use during the time Henry Stiner and Darlene Stiner worked as welders at Comanche Peak. Divide all such documents into time periods during which the pencil grinders would have been used.
27. Provide for inspection and copying all procedures, instructions, or other documents (as defined on page 2, item 3, of this pleading) which state that all welders shall have pencil grinders and/or that all welders shall have preheat bottles. Provide the original and all revisions of each such document.
28. Are NCR's currently being kept with the package of each support, etc.?
29. a. Who pays the ANI's?
- b. Provide for inspection and copying all documents (as defined on page 2, item 3, of this pleading) pertaining to the work done by the ANI's, who they shall report to, who pays them, who has the authority to hire and fire them, limitation of their scope of work, etc., including but not limited to all contracts, agreements, or other related documents.
30. a. Isn't it a fact that Brown & Root's ASME N-stamp is due to expire on 3/15/85? If not, when is the expiration date?
- b. Does ASME usually require a reinspection, resurvey, or audit before renewing an N-stamp?

- c. Has ASME contacted Applicants or their employees (as defined on pages 1 and 2, item 2, of this pleading) regarding such a reinspection, resurvey, or audit?
 - d. Has Brown & Root, Applicants, or any other employee of Applicants contacted ASME regarding the renewal of the N-stamp, a reinspection, a resurvey, or an audit?
 - e. Supply all documents (as defined on page 2, item 3, of this pleading) regarding items a. through d. preceding.
 - f. Has ASME made any reinspections, resurveys, or audits since the one which was made just prior to the last renewal of Brown & Root's N-stamp?
 - g. If the answer to f. is yes, supply all documents (as defined on page 2, item 3, of this pleading) regarding each such reinspection, resurvey, or audit.
31. Applicants were supposed to have been sending the Licensing Board and parties a regular update of the items to be completed in preparation for fuel load, and Applicants' current estimate of the date of fuel load.
- a. What was the rationale or reason for Applicants' having discontinued sending the Licensing Board this information?
 - b. Provide all documents (as defined on page 2, item 3, of this pleading) related to this matter.
 - c. Provide Applicants' current estimate of the date of fuel load for Unit 1 and for Unit 2.
 - d. Provide Applicants' current estimate of the percentage of completeness for each unit of Comanche Peak.
 - e. Provide a summary (similar to what Applicants have provide to the Board in the past) of the state of readiness for fuel

load of each item in the plant.

32. a. Following the public statements made by Nancy Williams, Cygna Project Manager (see 2/21/85 DALLAS MORNING NEWS article, attached to CASE's 2/25/85 Notification of New and Significant Information and CASE's Supplement to CASE's 10/15/84 Motions and Answer to Applicants' Motion for Summary Disposition Regarding Stability of Pipe Supports), did anyone, with Applicants, their counsel, or their employees (as defined on pages 1 and 2, item 2, of this pleading) contact Ms. Williams (either directly or indirectly, such as through Cygna's attorney or Ms. Williams' superiors), Cygna's counsel, or any other employee of Cygna regarding Ms. Williams' statements and/or Cygna's position on the stability issue?
- b. If the answer to a. preceding is yes, provide a summary of such conversation(s) or contact(s), and all documents (as defined on page 2, item 3, of this pleading) relating to such conversation(s) or contact(s).
33. Provide CASE with Applicants' responses to each and every question asked informally (or formally) by the NRC Staff under the Board's 12/18/84 Memorandum (Reopening Discovery; Misleading Statement). Provide any additional or supplementary responses to CASE at the same time you provide them to the Staff.
34. Provide CASE with all information provided by Applicants to the NRC Contention 5 Panel. Provide any additional or supplementary responses to CASE at the same time you provide them to the Contention 5 Panel.
35. In CASE's 2/4/85 Second Set of Interrogatories to Applicants and Requests to Produce re: Credibility, page 6, question 3(c) asks:

"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."

- a. In the attached 2/21/85 FORT WORTH STAR-TELEGRAM article, it is stated:

"The utility has paid Cygna \$3 million since 1983 to conduct an independent assessment of plant design safety, a company spokesman said."

(i) Is the \$3 million figure stated in the article correct?

(ii) Provide all contracts, letters of understanding, or any other correspondence or documents (as defined on page 2, item 3, of this pleading) to or from Cygna regarding any amounts paid or to be paid (whether a set figure is specified or not) to Cygna by Applicants.

36. The attached 2/20/85 articles from the DALLAS TIMES HERALD, THE DALLAS MORNING NEWS, and THE FORT WORTH STAR-TELEGRAM indicate that Applicants' witnesses David Chapman and Antonio Vega have been reassigned and will no longer be at Comanche Peak.

The articles also indicate that Messrs. James R. Wells, Phillip Halstead, and David McAfee will be replacing Messrs. Chapman and Vega at Comanche Peak, but that these three newcomers will not be permanent employees.

- a. Please comment on the accuracy of the preceding comments, and provide complete and specific details regarding these changes in personnel.
- b. What was the reason for these changes?
- c. Provide the job resumes for Messrs. Wells, Halstead, and

McAfee.

- d. How long is each of these three individuals expected to remain in his new position at Comanche Peak?
- e. For each of these three individuals, provide copies of all documents (as defined on page 2, item 3, of this pleading), including all contracts, letters of understanding, or other instructions to or from these three individuals from Applicants or their employees (as defined on pages 1 and 2, item 2, of this pleading) as to the scope, criteria, protocol, independence, salary and benefits, term of contract, and any other relevant data regarding each individual's review and activities at Comanche Peak.
- f. Was there ever (or will there be) any kind of understanding (written or oral) to the effect that any or all of these three individuals is 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).
- g. If the answer to f. preceding 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 any of the three individuals discussed such understanding, a brief summary of all discussions, the date of each such discussion, and any other pertinent details. Provide specific detailed information.

- h. Provide:

- (1) a listing of all public documents (including pleadings, Proposed Findings, etc., filed by CASE) which have been provided to each of the three individuals (by Applicants or others);
- (2) a listing of all other documents (as defined on page 2, item 3, of this pleading) which have been provided to each of the three individuals;
- (3) all documents (such as cover letters, memoranda, etc.) by which such documents were provided;
- (4) if the documents were handed to the individuals on site, please so indicate;
- (5) who (name, organization, and title) provided each such document to each of the three individuals;
- (6) the date on which each such document was supplied to each of the three individuals; and
- (7) copies of all documents listed in (2) preceding.

1. With further reference to d. preceding, CASE is concerned that these individuals, whom we assume Applicants consider to be experts in quality assurance/quality control, will be leaving just at the time Applicants will need expertise in implementing its QA/QC program for operations.

Please provide specific details and all documentation regarding how Applicants plan to deal with this potential problem.

37. Please review all of CASE's previous interrogatories and requests to produce, and supplement your answers as necessary to comply with 10 CFR 2.740(e). (When you are ready to do this, please call Juanita Ellis; we can probably assist in cutting down the scope of this request at

that time.)

38. With regard to the Licensing Board's 12/18/84 Memorandum (Reopening Discovery; Misleading Statement):

a. On page 9, the Board stated:

"We also invite Applicants to review their own testimony and to disclose all their errors in the course of this proceeding (or the related docket) in a single filing, together with explanations."

Do Applicants plan to take the Board up on its offer?

b. If the answer to a. preceding is yes, what is the time frame

Applicants anticipate this will be done?

c. Please supply responses to the concerns detailed by the Licensing Board in its Order.

39. a. Provide the basis for Mr. Brandt's 9/28/84 Affidavit indicating that there are no problems with the protective coatings. Supply complete details, including all documents (as defined on page 2, item 3, of this pleading) on which Mr. Brandt relied in any way in reaching his conclusions.

40. Provide the following individuals for depositions:

C. C. Randall

John Merritt

41. CASE would like to set up some onsite discovery time to look at some specific items (primarily, but not totally, documentation, to check out the retrievability of documents, etc.).

42. Provide the basis for each of Applicants' affidavits on which the Board relied to close out items, as listed in the Board's 3/15/84 Memorandum (Clarification of Open Issues). Provide all documents (as defined on page 2, item 3, of this pleading) on which each affiant relied in any way; please identify each item as to which Affidavit it applies to.

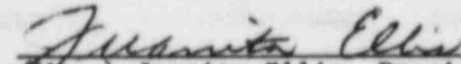
It should be noted that CASE believes that all documents discussed herein which pertain in any way to the Walsh/Doyle allegations or Applicants' Plan to resolve the design/design QA concerns should be provided by Applicants at no charge to CASE. It was CASE's understanding at the time we agreed to Applicants' proposals in this regard that we would be provided with three copies (one for Mr. Walsh, one for Mr. Doyle, and one for CASE) of each such document.

Regarding the rest of the documents we have requested, CASE believes that 7 cents a page is a reasonable price to pay for them, and we are willing to agree to that figure.

Although we have not indicated it specifically for each item requested, we mean for all documents to be supplied for inspection and copying.

If Applicants do not agree with CASE's proposals regarding the charges for copying, please promptly advise so that we can make whatever arrangements are necessary in advance of reviewing the documents.

Respectfully submitted,



(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound
Energy)

1426 S. Polk
Dallas, Texas 75224
214/946-9446

Quality control officials replaced at Comanche

By JACK BOOTH
Staff Writer

The principal owners of the Comanche Peak nuclear plant announced Tuesday they are replacing the top two quality control managers because of federal criticism about the plant's safety program.

Texas Utilities Electric Co. spokesman Dick Ramsey said the utility is bringing in three experts from outside companies, including the former head of quality control for Duke Power Co., widely viewed in the industry as having one of the most successful nuclear programs in the country.

Ramsey said the shakeup stemmed from last month's report in which the U.S. Nuclear Regulatory Commission staff said Texas Utilities "lacked the commitment to aggressively implement an effective" quality control program.

The report cited serious, widespread quality control problems at the plant near Glen Rose, where the first of two reactors is virtually completed. Another NRC report said the problems "cast doubt on the adequacy and quality of construction" at the plant.

Top NRC officials said last month they believed management changes would be needed to cor-

See COMANCHE on Page 18

Comanche Peak quality managers to be replaced

COMANCHE — From Page One
rect the situation.

"You have to look at why it didn't work, and you have to fix that from a corporate management standpoint," NRC licensing director Darrell Eisenhut said. "Otherwise you will not have confidence in this utility in the future."

While not admitting that the plant's quality effort has been inadequate, Ramsey said the company believed a major change was necessary to resolve the NRC's concerns.

"We feel the restructuring will give us a fresh approach, as well as additional management," he said.

The changes involve David N. Chapman, the quality assurance manager for the last eight years, and Tony Vega, who has served since last spring as quality control manager and has been part of the quality program since construction began 11 years ago. Both will be reassigned March 1 to positions outside the company's nuclear operations.

Ramsey said they will be replaced by James R. Wells, who developed and managed Duke Power's quality control supervision of seven nuclear projects in North Carolina, and Phillip Halstead and David M. McAfee, quality control officials of the Daniels Construction Co., a nuclear contractor in Greenville, S.C.

Ramsey said the three will be on loan from their companies to Texas Utilities for the duration of the project. Wells will assume a new position as director of quality

assurance, while Halstead will serve as quality manager at the plant and McAfee will direct quality assurance at the Dallas office.

Ramsey said Texas Utilities is still studying the issues raised by an NRC task force last month. The utility is scheduled to meet with the task force for three days in each of the next two weeks to discuss what needs to be done to resolve the NRC's questions.

The NRC issues, which must be answered before the plant can receive an operating license, forced the utility on Jan. 23 to revise the plant's cost estimate to \$4.56 billion, almost six times the original estimate of \$779 million.

The utility said it now expects the first of the two reactors to begin operation in early 1986, six years behind schedule. But Ramsey said both the cost and the schedule could change if a major reinspection or significant rework is needed to answer the NRC questions.

A Washington, D.C.-based, public interest group, the Government Accountability Project, has asked the U.S. Atomic Safety and Licensing Board to order a complete reinspection. The board has yet to rule on the request.

WEDNESDAY, FEBRUARY 20, 1985

7 Sections 25 Cents

Dallas Times Herald

Metropolitan

Wednesday, February 20, 1985

©The Dallas Morning News, 1985

The Dallas Morning News

H-3

19 A

New managers hired for Comanche Peak

By David Real

Staff Writer of The News

In a major shakeup of the troubled quality assurance program at Comanche Peak nuclear power plant, Texas Utilities will hire three managers with extensive nuclear experience, utility officials said.

The Nuclear Regulatory Commission last month criticized senior utility management for lack of commitment to aggressively implement effective quality assurance

and quality control programs to guarantee the safety of the plant.

Mike Spence, president of Texas Utilities Generating Co., said the addition of the new personnel and the creation of a new office for quality assurance was designed to promote a fresh management perspective requested by the NRC Jan. 8.

Spence said the changes were made to "maintain and to the extent required, regain the confidence of the NRC in our program

and in the quality and the safety of that plant and in our ability to identify and solve our own problems."

Vince Noonan, the NRC project manager for Comanche Peak and director of the special NRC task force that identified quality assurance problems at the plant, said he generally approved of the changes.

"It's a step in the right direction," Noonan said.

But he said that he still had concerns about potential safety hazards

involving nuclear-related quality assurance inspections performed by Brown & Root Inc. of Houston, the general contractor for Comanche Peak. Spence would not comment directly on Brown & Root but said corrective actions will be developed "as required."

Spence said the new managers, who currently work for highly regarded companies that have built almost a dozen nuclear plants, are:

■ James R. Wells of Duke Power Co. of North Carolina. Wells will

be the head of the newly created office of director of quality assurance and will report directly to Billy Clements, vice president of nuclear operations, Spence said. Wells has almost 20 years' experience in quality assurance.

■ Phillip Halstead of Daniels Construction Co. of Greenville, S.C. Halstead, who has more than 14 years of heavy construction experience and expertise in nuclear inspection, will replace Antonio Vega as the Comanche Peak site

quality control manager. Vega will become manager of the systems, protection and testing division for Dallas Power & Light Co.

■ David McAfee, also of Daniels Construction Co. McAfee, who has 18 years of experience in quality assurance, including 10 years as a

quality assurance manager, will replace David Chapman as the Dallas-based manager of quality assurance. Chapman will assist the Texas Utilities Generating Co. vice president for gas plant operations.

Quality control duo replaced at power plant

By BRUCE MILLAR
Star-Telegram Writer

In the second management shuffle in as many weeks, Texas Utilities Electric Co. on Tuesday removed two top-level quality control managers and replaced them with three outside specialists who have had no involvement at the troubled Comanche Peak nuclear power plant.

Company spokesman Dick Ramsey said the management shake-up was needed to add a "fresh perspective" and extra senior management supervision to the utility's quality control program. Last month, the

FORT WORTH STAR-TELEGRAM

Nuclear Regulatory Commission said Texas Utilities Electric Co. had not demonstrated a commitment to aggressive quality control in several key areas.

The harshly critical NRC report cited more than 100 potential safety concerns with the quality control program. Utility officials next month are expected to unveil their plan for remedying those problems.

"It is our conclusion that this is the sort of thing that it is going to take to resolve the concerns," Ramsey said.

Under the reorganization, Ramsey said,

top quality control manager Dave Chapman and his on-site deputy, Antonio Vega, will be transferred laterally to non-nuclear jobs within Texas Utilities Electric Co. Chapman has headed the program for more than eight years and has been a staunch defender of the plant's quality control program.

Effective March 1, James R. Wells, director of quality assurance for North Carolina's Duke Power Co., will assume a newly created position as director of quality assurance. He will supervise about 250 employees. Wells has worked on seven

nuclear reactors while at Duke Power.

Assisting Wells will be two experienced engineers now employed by Daniels Construction Co. of Greenville, S.C. The firm has been a contractor at four nuclear plants, Ramsey said.

Phillip Halstead, a senior civil engineer with 14 years' experience in heavy construction, will replace Vega as on-site manager of quality assurance. David M. McAfee, who has 18 years of quality assurance experience, will replace Chapman.

Please see Quality on Page 2

Quality control duo replaced at plant

Continued from Page 1

"We think we are pretty fortunate to get people of their caliber," Ramsey said.

The utility must demonstrate an effective quality control program to obtain a federal operating license. Two weeks ago, utility officials announced another attempt to bolster NRC confidence in the utility's ability to correct problems at the \$4.56 billion plant. The plant is near Glen Rose, 45 miles south-west of Fort Worth.

Utility officials told an NRC panel Feb. 7 that two top utility executives had been replaced on the utility's correction action team by outside experts. The changes would make the team more independent and objective, utility officials said.

Ramsey credited Wells with designing and operating Duke Power's quality assurance program. Duke Power boasts one of the most successful construction records in the nuclear industry.

Last March, a plant built by Duke Power began commercial operations at one-third the cost of the average new U.S. nuclear plant.

"They have a very successful nuclear program, and this is the guy who developed and managed their quality assurance program," Ramsey said.

Critics of the Comanche Peak project were unimpressed.

"I think it is an admission that their quality assurance program is in shambles," said Juanita Ellis, president of the Dallas-based Citizens Association for Sound Energy.

"They need more than fresh perspective. They need a change of attitude from upper management on down through the ranks," she said.

Billie Garde, a representative of the Government Accountability Project, based in Washington, D.C., criticized the appointment of Wells as "extremely unfortunate." GAP had opposed li-

censing of Duke Power's Catawba plant in South Carolina.

Garde said Wells had been ineffective in resolving complaints from welding quality control inspectors at the Catawba nuclear power plant. The plant was licensed last month but appeals are pending.

Ramsey said the transfers of Chapman and Vega were lateral moves. Vega, who has been with Texas Utilities nuclear program for 11 years, will become manager of the systems protection and testing division for subsidiary Dallas Power & Light.

Chapman will become assistant to Max Tanner, Texas Utilities Generating Co. vice president for gas plant operations.

Ramsey said the three newcomers would not be permanent employees. He said they would be on loan.

FILM

NOT

DO

Chairman
Atomic Safety and Licensing Appeal
Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Robert Martin
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76011

Lanny A. Sirkin
3022 Porter St., N. W., #304
Washington, D. C. 20008

Renea Hicks, Esq.
Assistant Attorney General
Environmental Protection Division
Supreme Court Building
Austin, Texas 78711

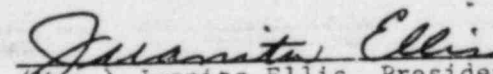
Anthony Z. Roisman, Esq.
Trial Lawyers for Public Justice
2000 P Street, N. W., Suite 611
Washington, D. C. 20036

Mr. Owen S. Merrill
Staff Engineer
Advisory Committee for Reactor
safeguards (MS H-1016)
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. David H. Boltz
2012 S. Polk
Dallas, Texas 75221

Michael D. Spence, President
Texas Utilities Generating Company
Skyway Tower
400 North Olive St., L.B. 81
Dallas, Texas 75201

Docketing and Service Section
(3 copies)
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



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