

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

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OFFICE OF THE SECRETARY  
REGULATORY & SERVICE  
BRANCH

In the Matter of )  
 )  
GEORGIA POWER CO., et al. )  
 )  
(Vogtle Electric Generating Plant, )  
Units 1 and 2) )

Docket Nos. 50-4240B

CAMPAIGN FOR A PROSPEROUS GEORGIA/GEORGIANS AGAINST NUCLEAR ENERGY  
SECOND SET OF INTERROGATORIES AND REQUESTS TO PRODUCE

Pursuant to 10 CFR Sections 2.740 (b) and 2.741, Intervenors Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy (hereinafter "CPG/GANE") hereby serves its Second Set of Interrogatories and Requests to Produce upon the Applicant in the above-styled proceeding. These interrogatories and requests to produce involve CPG/GANE's Contention 8.

Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to the Applicant including its officers, employees, agents, advisors or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of, or are otherwise available to, the Applicant, including its officers, employees, agents, advisors or counsel. In answering each interrogatory and responding to each request, please recite the interrogatory or request preceding each answer or response. Also, identify the person providing each answer or response, including but not limited to his or her name, address, employer, current position and a statement of professional qualifications.

These interrogatories and requests shall be continuing in nature. Thus, whenever any information is obtained which renders any previous response incorrect or incomplete or indicates that a response was incorrect or incomplete when made, the Applicant is hereby requested to supplement its previous response to the

appropriate interrogatory or request to produce.

The term "document" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. CPG/GANE requests that at dates to be agreed upon, the Applicant make available for inspection and copying all documents subject to the requests set forth below.

#### Requests for Documents

Pursuant to 10 CFR Section 2.741, CPG/GANE requests Applicant, by and through its attorneys, make available for inspection and copying, at a time and location to be designated, any and all documents of whatsoever description identified in the responses to the Intervenors' interrogatories below, including but not limited to:

- (1) any written record of any oral communication between or among Applicant, its advisors, consultants, contractors, agents, attorneys, and/or any other persons, including but not limited to the NRC staff, the Intervenors, and their advisors, consultants, contractors, agents, attorneys and/or any other persons; and
- (2) any documents, correspondence, letters, memoranda, diagrams, reports, charts, photographs, or any other writing of whatsoever description, including but not limited to work papers, prior drafts and notes of meetings.

If Applicant maintains that some documents should not be made available for inspection, Applicant should specify the documents and explain why such are not being made available. This requirement extends to any such document, described above, in the possession of or available to the Applicant, its advisors, consultants, agents or attorneys.

#### Interrogatories

Pursuant to 10 CFR Section 2.740(b), CPG/GANE requests the Applicant by and through its attorneys answer separately and fully in writing, under oath or

affirmation, by persons having knowledge of the information requested, the following interrogatories.

A. General Interrogatories

The following interrogatory applies severally to each of the contentions admitted as issues in controversy in this proceeding: CPG/GANE Contentions 7, 8, 10, 11, 12 and 14.

1. Please identify (by name, business address, occupation and employer) a) all individuals who have knowledge or information responsive to each interrogatory and designate the interrogatory or the part thereof which that individual answered; and b) each person you expect to call as an expert witness in this proceeding as well as a brief description of the subject matter on which that person is expected to testify and the substance of that testimony, the witness's educational and professional background, and the identity of any previous proceedings in which that person has testified.

Interrogatories Relating to CPG/GANE Contention #8

1. When the Applicant recently fired employees involved in procurement due to allegations of bid-rigging, what investigations were performed to assure that quality of materials and work was not affected as well as pricing? What was the result of these investigations? Please provide details, including copies of the investigation results.
2. How were vendors approved for the Qualified Vendors List? Describe in detail any and all methods for choosing qualified vendors.
3. What provisions does the Applicant have for auditing vendors to assure compliance with contract specifications and QA/QC requirements?
4. Have any employees or bidders alleged that political or personal favoritism has resulted in preferential treatment being given to some contractors? Please provide details.

5. Has any contractor, including but not limited to Westinghouse Corporation and Bechtel, taken officials of the Applicant on trips to Europe or provided other benefits to them? Please provide details.
6. How often has the Applicant been cited for violation of NRC rules, regulations and procedures at Plant Vogtle since the construction permit was issued? How many violations were at each severity level?
7. Describe in detail any such violations which were at the most severe, second most severe or third most severe level of violation.
8. For each contractor or subcontractor at Plant Vogtle, briefly describe the area and type of work they are responsible for, give the date on which they became involved with Plant Vogtle, and if their contract has been terminated, the date of and reason for termination.
9. Who is responsible for training workers (laborers, craftspeople, inspectors, etc.) at the plant: the Applicant, Bechtel, the individual contractor/subcontractor or the union?
10. What assurance is there that workers are properly trained and qualified before they are permitted to do their work? List all recognized industrial standards (e.g. ANSI) for the training of workers which are applicable to Plant Vogtle and indicate how they are being met.
11. Have there been any allegations of harassment or intimidation of inspectors at Plant Vogtle? If so, list each such incident and provide details.
12. List every act of vandalism directed at the structure of Plant Vogtle or components thereof, giving the date, extent and location of each incident, and explain how the vandalism was discovered.
13. Have any engineering change notices been generated at Plant Vogtle due to the use of equipment that could not meet the original specifications? Provide details.
14. What vendors have been replaced? Why? Provide details, including reasons for replacement, name and address of vendor, name and phone number of contact person for

vendor, and other relevant information.

15. Have any procedures been changed (either Applicant's or contractors') because workers were unable to comply with the original procedures? Provide details.

16. What impact on quality of workmanship resulted from alleged use of drugs by construction employees? Following the arrest of plant workers on drug charges, what studies, analyses or other action did the Applicant take to assure that quality and safety were maintained in the construction of plant? What were the results of these studies, analyses or other action? Provide details, including copies of any reports.

17. Have any workers been fired for any reason by the Applicant and/or its contractors/subcontractors following allegations of poor construction or QA practices at Plant Vogtle they made to the NRC, news media, or any other person or entity? Provide details.

18. Describe procedures for pouring concrete during all weather conditions, including all measures for protection of quality assurance.

19. Describe procedures for welding during all weather conditions, including all measures for protection of quality assurance.

20. What is the identification of the individuals who performed the in-process testing of the plastic concrete for the Unit 1 RB basemat pour?

21. What is the identification of the individuals who inspected the concrete placement for this pour?

22. What assurance is provided that equipment stored on site is adequately protected prior to its installation?

23. What follow-up inspections have been performed, and with what results, to ascertain what damage was done to the electrical cabinets on site? Provide details.

24. What provisions does the Applicant have to assure that materials are traceable if defective materials are found? Provide details.



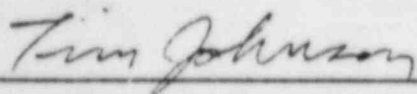
25. Does the Applicant or any of its contractors or subcontractors maintain any quote or target system for dismissing workers? Provide details.
  26. Does the presentation of a new Readiness Review Plan imply that the existing quality control/quality assurance program was deficient? What changes have been proposed? What changes have been implemented?
  27. What requirements exist to assure the proper training of engineers for the Applicant, its contractors and its subcontractors? Provide details.
  28. Provide details on the cracking in the containment rack pipe welds. Why were workers not trained so as to prevent such an occurrence? What measures have been taken to assure that similar breakdowns do not occur in other areas? Provide specific details, including specific changes in the existing QA/QC program in response to this discovery.
  29. What vendor provides core drilling at the site? What experience does this vendor have in this field? What training do its workers have in core drilling? Provide details.
  30. What tests have been conducted on the lifting eyes of concrete hatch covers? Provide details of the testing, including results.
  31. What measures have been taken regarding unqualified motors in Limitorque motor-operated valves? Please provide details of the problem and the Applicant's response thereto.
  32. Describe in detail any problems the Applicant has experienced with the residual heat removal system, including potential consequences and measures to correct each problem.
- U. Requests to Produce Relating to CPG/GANE Contention #8
1. Provide a copy of the approved qualified vendors list, qualifying letters and qualifying materials.
  2. Provide copies of all internal or other audits of quality assurance/quality control at Plant Vogtle.

3. Provide copies of all I & E reports relating to quality assurance/quality control at Plant Vogtle.
4. Provide copies of all Stop Work orders for Plant Vogtle.
5. Provide copies of all contracts with A & W Oil.
6. Provide a copy of the contract for the Westinghouse NSSS.
7. Provide a copy of the contract with Bechtel.
8. Provide a copy of the procurement procedures manual.
9. Provide a list of all contractors and subcontractors engaged by Applicant to perform any activities pertaining to the construction of Plant Vogtle ("activities" includes QA documentation and audit work as well as physical construction). Include contractors and subcontractors which were previously engaged by the Applicant as well as those presently so.
10. Provide a list of all trade unions whose members are involved with Plant Vogtle and, for each union listed, the phone number and address of the local most directly involved.
11. Provide all amendments to the PSAR Chapter 17 and the date they were adopted.
12. Provide all allegations made by Pullman Power Products quality control personnel concerning construction and the Applicant's response(s) thereto.
13. Provide all allegations concerning Walsh Company and the Applicant's response thereto.
14. Provide all Plant Vogtle Quality Concern Forms turned in since the beginning of construction.
15. Provide a list of all forms used to document deviations from design specifications or procedures.
16. Provide copies of all audit action requests.
17. Provide all corrected action requests.
18. Provide all information relating to the "inadequate core cooling system" as

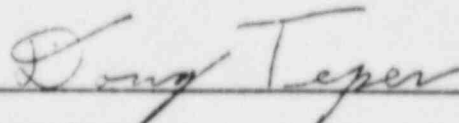
discussed at the meetings June 12 and June 27, 1984.

19. Provide all information relating to the meeting of August 22, 1983 concerning subcontractor Quality Assurance.
20. Provide any statements or agreements which Applicant or its contractrs/subcontractors may require workers to sign or otherwise comply with which restrict or regulate in any way the employees' talking to or being involved with the NRC, NRC staff, news media, intervenors, public interest groups, or any other person or entity concerning the construction of Plant Vogtle.
21. Provide copies of all nonconformance reports, deviation analysis reports, action requests, corrective action requests, audit action requests, field variance authorizations, deficiency reports, field questions, stop work notifications, stop work releases, field disposition instructions, field deviation disposition requests, Plant Vogtle construction work authorizations, conditional releases, and audit reports generated at Plant Vogtle from the inception of construction to the present.
22. Provide any trend analyses performed at Plant Vogtle.
23. Provide the master deficiency list.
24. Provide any engineering change notices generated at Plant Vogtle for any reason following the discovery that equipment could not meet the original specifications.
25. Provide all documents relating to core drilling into rebars at Plant Vogtle.
26. Provide all documents relating to storage of equipment on site, including but not limited to storage of electrical cabinets.

Respectfully submitted, this, the 7th day of December, 1984,



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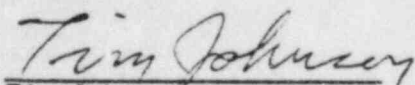
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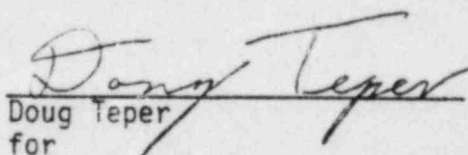
Docket Nos. 50-424 and 50-425  
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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing Campaign for a Prosperous Georgia/Georgians Against Nuclear Energy Second Set of Interrogatories and Requests to Produce were served by deposit with the U. S. Postal Service in the City of Atlanta for first class delivery to those listed on the attached Service List this 7th day of December, 1984.



Tim Johnson  
Executive Director  
Campaign for a Prosperous Georgia



Doug Teper  
for  
Georgians Against Nuclear Energy

