

August 5, 1985

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'85 AUG -8 P12:18

In the Matter of:)
COMMONWEALTH EDISON COMPANY)
(Braidwood Nuclear Power)
Station, Units 1 and 2))

Docket Nos. 50-4560
50-457

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

APPLICANT'S SECOND PARTIAL RESPONSE TO
ROREM'S FIRST SET OF QUALITY ASSURANCE
INTERROGATORIES AND REQUESTS TO PRODUCE

On July 2, 1985, Intervenors Rorem, et al.

("Intervenors"), filed their First Set of Quality Assurance Interrogatories and Requests to Produce. On July 30, 1985, Commonwealth Edison Company ("Applicant") filed objections to certain of those discovery requests and its first partial response to Intervenors' discovery requests. In its cover letter accompanying its first partial response, Applicant noted that although documents responsive to specific Interrogatory No. 11 were being provided, the actual response to specific Interrogatory No. 11 would be provided at a later date. This submission, which is Applicant's second partial response to Intervenors' discovery requests, provides the response to specific Interrogatory No. 11. Investigation continues for responses to all of the requests to which Applicant has not objected.

Each document identified in Applicant's response or incorporated by reference into Applicant's response has been

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identified with a number. In addition, Applicant has provided indices for these documents organized by interrogatory number, which identify for each numbered document the date, author, recipient, and type of document. The indices will be updated with each partial response submitted by Applicant.

Documents which are incorporated by reference to answer interrogatories are being provided to all parties. Documents which are simply identified in answers to interrogatories, but not incorporated by reference, are available for inspection and copying. Documents for which Applicant is asserting privilege have not been provided, and an indication can be found on the indices as to whether the attorney client ("AC") or attorney work product ("WP") privilege is being asserted.

With regard to requests for addresses and telephone numbers of individuals employed by Commonwealth Edison or its contractors, onsite personnel can be located by contacting Braidwood Nuclear Power Station, Braceville, Illinois 60407 (phone 815-458-2801). Other Commonwealth Edison personnel can be located by contacting 72 W. Adams St., P.O. Box 767, Chicago, Illinois 60690 (phone 312-294-4321). Applicant is making a further review of individuals identified in response to specific interrogatories and will supplement its answers to the extent that such individuals now have other addresses or telephone numbers.

Specific Interrogatory 11

Please identify all audits conducted pursuant to 10 CFR Part 50 Appendix B Criterion XVIII or otherwise, including but not limited to the 1980 audit of Phillips-Getschow referred to in the June 29, 1984 letter from George Marcus of Commonwealth Edison to Mari Kaye Roth of Peterson & Co., and any audits by or under the guidance of the Institute for Nuclear Power Operation (INPO). For each reported observation, discrepancy, deficiency or weakness, indicate: the nature of the deficiency; the Appendix B criteria, if any, to which it relates and the respects in which noncompliance is reflected; the date and other identifying information of the audit documentation; the names, titles, addresses and telephone numbers of each person responsible for the deficiency, the performance of the audit, the management review of the results and its corrective action; a detailed description of the deficiency and its safety implications; a detailed description of its corrective action.

Response

Subject to Applicant's partial objection to this interrogatory, "audits conducted pursuant to 10 C.F.R. Part 50, Appendix B, Criterion XVIII or otherwise" have been compiled. These audit reports are identified and stamped as pages B0000000 through B0000659; I0000000 through I0000095; I0000180 through I0000576; and M0000282 through M0000373.

In general, two categories of audit reports have been provided. The first category includes those audit reports encompassed by Subparts 12A., 12H., 14A., 14B.2, 14B.3, and 14B.4 of the Amended QA Contention and any related audit reports and surveillances that were conducted as follow-up activities. The second category encompasses those reports of audits of corrective actions taken by Commonwealth Edison Company with respect to specific deficiencies

identified in the Amended QA Contention and the reports of any ensuing follow-up surveillances. This latter category includes audit reports encompassed by Subparts 3A.4e, 4A., 6B.5, 14B.2 and 14B.3 of the Amended QA Contention. The documents provided contain information on the corrective actions for findings and observations made in the audit reports.

Specific Interrogatory No. 11 sets forth a series of questions that seek information that is embodied in the documents provided. No attempt has been made to extract that information for inclusion in this response because it can be readily gleaned from the audit reports and other documentation. A review is continuing to determine if any additional documents falling within the purview of Interrogatory 11 exists. Any such information, if found, will be provided in a supplemental response on a prompt basis.

Although the entire audit report has been provided in each instance, in some cases specific pages or parts of the audit report provide the response to specific Interrogatory No. 11. The following table provides this information.

<u>Page Audit Begins On</u>	<u>Page References Within Audit</u>	<u>Contention Referred to</u>
B0000000	Through B0000006	12H
B0000007	B0000009-10, B0000014-15, B0000017-19, B0000023-32	12A, 14A

B0000033	B0000034-40, B0000042-44	12A, 14A
B0000045	Through B0000052	12A, 14A
B0000053	B0000055, B0000057, B0000062-63, B0000090-93	14B.4
B0000100	B0000102, B0000104,	14B.4
B0000139	B0000142-143, B0000148-169	14B.4
B0000175	B0000177-178, B0000182-186, B0000191, B0000196-199, B0000203-204, B0000223-225	3A.4e, 14B.4
B0000226	Through B0000232	14B.4
B0000233	B0000234, B0000239, B0000251-252	14B.4
B0000253	B0000255-256, B0000259, B0000267, B0000269	14B.4
B0000290	B0000292-293, B0000295-297, B0000304, B0000307-310, B0000311-313, B0000317-320	14B.4
B0000328	B0000337, B0000361-369	4A
B0000386	B0000388-389, B0000404-415	6B.5
B0000423	B0000424-425, B0000431-432, B0000438-440	14B.2

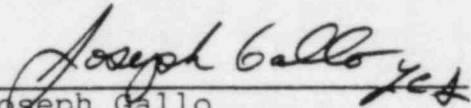
B0000448	B0000449, B0000452-454	14B.3
B0000458	B0000460, B0000472-473, B0000475-477	14B.3
B0000484	Through B0000494, B0000498-500, B0000503-504, B0000505-537	12A, 14A
B0000552	Through B0000597	12A, 14A
B0000598	B0000599, B0000601-603, B0000612-614, B0000616-639, B0000644-650	12A, 14A
I0000000	I0000001-03, I0000009-11, I0000015-38, I0000043-45	12A, 14A
I0000048	I0000057-58, I0000062, I0000072-73, I0000083, I0000093-94	12A, 14A
I0000181	I0000185-186, I0000192-193, I0000210-211	12A, 14A
I0000214	I0000216-225, I0000295-378, I0000381, I0000398-400, I0000479-483	12A, 14A, 14B.2
M0000282	Through M0000298	14B.3
M0000299	Through M0000316	14B.3
M0000317	M0000325-326, M0000330-334, M0000337-339, M0000349-355	14B.3

M0000356

M0000358,
M0000361-366

14B.3

Respectfully submitted



Joseph Gallo
One of the Attorneys for
COMMONWEALTH EDISON COMPANY

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August 5, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)
COMMONWEALTH EDISON COMPANY)
(Braidwood Nuclear Power) Docket Nos. 50-456
Station, Units 1 and 2) 50-457

AFFIDAVIT IN RESPONSE TO ROREM, ET AL.,
QUALITY ASSURANCE INTERROGATORIES 11

I, Steven C. Hunsader, being first duly sworn, hereby depose and say as follows.

1. I am employed by Commonwealth Edison Company ("Edison") in its Braidwood Projects Site Quality Assurance organization. My job title is Quality Assurance Supervisor. As a result of my experience in this position and others in the Quality Assurance organization, I have knowledge of the Edison quality assurance documentation system and of the filing and retrieval system for Quality Assurance documents both for Edison and for its contractors at Braidwood.
2. I have either conducted or reviewed the search of records which was conducted in response to specific Interrogatory No. 11. To the best of my ability to determine, the search has been thorough and complete. To the extent specific Interrogatory No. 11 is not objected to, the answer to specific Interrogatory No. 11 is true and complete to the best of my knowledge and belief. To the extent the request for production of documents is not objected to, the documents provided or made available are a complete and accurate response to the best of my knowledge.

3. The foregoing representations are made on the basis of my personal knowledge.

Steven C. Hunsader
Steven C. Hunsader

SUBSCRIBED AND SWORN to
before me this 2nd day of
August, 1985

Carol J. McCoy
Notary Public

My Commission expires 10/30/85

August 5, 1985

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA DOCKETED
NUCLEAR REGULATORY COMMISSION USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
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In the Matter of)	OFFICE OF SECRETARY
)	DOCKETING & SERVICE
COMMONWEALTH EDISON COMPANY)	BRANCH
)	Docket Nos. 50-456 ^{OL}
(Braidwood Nuclear Power Station)	50-457
Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of COMMONWEALTH EDISON COMPANY'S Second Partial Response to Rorem's First Set of Quality Assurance Interrogatories and Requests to Produce were served on the persons listed below by deposit in the United States mail, first-class postage prepaid, unless otherwise indicated, this 5th day of August, 1985.

Lawrence Brenner, Esq. Chairman
Administrative Law Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Dr. Richard F. Cole
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Atomic Safety and Licensing Board
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Washington, D.C. 20555

Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
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Dr. A. Dixon Callihan
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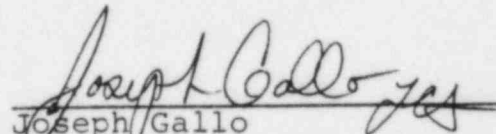
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Mr. William L. Clements
Chief, Docketing and Services
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Commission
Office of the Secretary
Washington, D.C. 20555

Ms. Lorraine Creek
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*Federal Express Service deposit on August 5, 1985 for
delivery on August 6, 1985.



Joseph Gallo
One of the Attorneys for
COMMONWEALTH EDISON COMPANY