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ORIGINAL

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of:

50-445/446

DISCUSSION ON MOTIONS FOR SUMMARY
DISPOSITION FILED BY APPLICANT

COMANCHE PEAK

Location: Bethesda, Maryland

Pages: 1-87

Date: August 6, 1984

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1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

3 DISCUSSION ON MOTIONS FOR SUMMARY
4 DISPOSITION FILED BY APPLICANT

5 Conference Call
6 7735 Old Georgetown Rd.
7 Bethesda, MD
8 Room 10117

9 August 6, 1984

10 Meeting in the above-entitled matter convened at
11 8:00 p.m.

12 APPEARANCES:

13 On behalf of the Applicants:

14 DR. ROBERT IOTTI
15 JOHN FINNERAN
16 DAVID WADE
17 WILLIAM A. HORIN, ESQ.

18 On behalf of the NRC Regulatory Staff:

19 GEARY S. MIZUNO, ESQ.
20 SPOT BURWELL
21 HANK FLECK
22 DAVID TERAQ
23 JOHN BRAMMER

24 On behalf of the Intervenor Citizens Association
25 for Sound Energy:

JUANITA ELLIS, President
1426 South Polk Street
Dallas, Texas 75224

Mark Walsh

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P R O C E E D I N G S

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MR. BURWELL: My name is Spot Burwell, I'm the Comanche Peak Project Manager for the NRC. I have with me here tonight, David Terao, and the court reporter. I would recommend that we go through and introduce ourselves one more time to give the court reporter one more opportunity to hear your voice.

MR. MIZUNO: This is Geary Mizuno, counsel to the NRC staff.

MS. ELLIS: Juanita Ellis for the Intervener CASE. With me is Mark Walsh. Mark, do you want to say something for the reporter. Woops, I will go see if I can find him.

MR. HORIN: Who are the consultants for the NRC staff one more time?

MR. FLECK: Yes. This is Hank Fleck. I am with E-Tech, consultant for the NRC.

MR. BRAMMER: John Brammer with E-Tech, consultant for the NRC.

MR. HORIN: John, how do you spell your name?

MR. BRAMMER: Brammer.

MS. ELLIS: Okay. Mark is on now. Do you want to say something, so the reporter can hear your voice.

MR. WALSH: This is Mark Walsh.

MR. HORIN: This is Bill Horin, counsel for

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1 Texas Utilities. We have three other individuals on the
2 line also, which I will go around in alphabetical
3 order.

4 MR. IOTTI: This is Bob Iotti.

5 MS. ELLIS: You just faded completely.

6 MR. IOTTI: I am a consultant to Telco.

7 MR. WADE: This is David Wade with Texas
8 Utilities, also.

9 MR. BURWELL: Okay. Let's go ahead and try it.
10 As I understand it, the purpose of this meeting is to
11 allow CASE to ask the Texas Utilities questions
12 concerning the, some of the motions for summary
13 disposition that have been filed by Texas Utilities.
14 Before we go into that, I would like to find out what
15 the agenda is this evening. In particular, I would like
16 to establish early on that we are going to talk about
17 the items in which by consultants at E-Tech
18 participate, and if so, to take that up early in the
19 agenda. If not, to drop them off.

20 MS. ELLIS: Right. I think that is a good way.
21 After talking with you earlier today Spot, as we
22 discussed, I haven't discussed with the applicants yet,
23 I think that we can save a lot of time. Bill Horin had
24 asked that we try to limit this to a couple of hours. I
25 think that we can probably do that by doing a few

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1 things to begin with. I think the quality assurance for
 2 design questions don't need necessarily to have
 3 everybody, all of the technical people on the line.
 4 What I propose to do, and what we discussed was to try
 5 to do something in writing on that, and get that off if
 6 not tonight, tomorrow for sure, so that the applicants
 7 can have it right away, and everyone can have it. Then,
 8 get back with another, and informally try to take care
 9 of those things. That will save us some time tonight.

10 Also, Mark has indicated, I don't believe we
 11 really will have any questions on the upper lateral
 12 restraint. We just would like to be sure that we get
 13 the same information that was given the staff on it.
 14 Another thing, I know you had mentioned, Spot, that
 15 some of your people might be interested in is about the
 16 differential displacement. We don't have any questions
 17 on that. So, any of them that are involved with the
 18 staff, they don't really need to stay on the line.

19 Other than that, the ones that we do want to
 20 get into tonight are, first, cinched up U-bolts, axial
 21 restraints, richman inserts, and stability. Knowing the
 22 way things go, we figure that will probably take the
 23 rest of the time that we have allotted. We are going to
 24 try and go through just as quickly as possible.

25 MR. BURWELL: Excuse me, Ms. Ellis. What was

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1 the third one? You had cinched up U-Bolts, actual
2 restraints, Richman inserts.

3 MS. ELLIS: Richman inserts.

4 MR. BURWELL: I believe there are two of those
5 on Richman inserts.

6 MS. ELLIS: Not that we have gotten.

7 MR. BURWELL: Okay.

8 UNIDENTIFIED SPEAKER: Spot, there is just
9 one.

10 MR. BURWELL: Just one, alright.

11 MS. ELLIS: Stability was the fourth one.
12 Does that fit in with your people okay Spot? We could
13 rearrange it if we need to.

14 MR. FLECK: Spot, this is Hank Fleck. If you
15 could do the U-bolt cinching actual restraint, I would
16 appreciate it. We are not on, well, we haven't gone out
17 to dinner yet. If we could get that out, that would
18 help us here.

19 MS. ELLIS: Excuse me, I can't hear whoever is
20 talking at all. I can tell there is talking, but I
21 can't understand it at all. You will have to translate
22 whatever they say.

23 MR. BURWELL: Okay. That was Hank Fleck. Mr.
24 Fleck requested that we take up the cinch U-bolt first.
25 That difficulty is that they have to pull together some

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1 things and look over some personal business before they
2 get on the plane early tomorrow morning to arrive here
3 to be at the meeting on Wednesday.

4 MS. ELLIS: Right. Are there any others that
5 we need to arrange?

6 MR. BRAMMER: Are you going to ask any
7 questions on local stress and displacement?

8 MS. ELLIS: I couldn't hear that, Spot.

9 MR. BURWELL: Mr. Brammer, I believe, asked if
10 you were going to ask anything on local displacements
11 and stresses.

12 MS. ELLIS: I believe that, is that the
13 differential displacement?

14 UNIDENTIFIED SPEAKER: No. We will not.

15 MR. BRAMMER: Thanks.

16 MR. HORIN: This is Bill.

17 MS. ELLIS: I can barely hear you, Bill.

18 MR. HORIN: Before we start, I want to clarify
19 a couple of things. The first thing, to determine
20 whether or not there are, whether you plan to ask any
21 additional questions in this exercise with respect to
22 anything other than the cinch U-bolts, the actual
23 restraints, the Richman stability, and the design QA? Is
24 it my understanding that those last five you have
25 questions on?

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1 MS. ELLIS: I believe that is right, isn't it
2 Mark?

3 MR. WALSH: Yes.

4 MR. HORIN: As we discussed this morning, I'm
5 sure, Mark that Juanita passed it along to you. We
6 would anticipate that you would be able now, after
7 having these for a month to have focused questions. I
8 asked her to pursue those things that you really
9 believe are important in material. We want to provide
10 the information that is necessary to respond, but we
11 don't want to exercise in dealing with the new shift.
12 It is not important, and I'm sure you will be able to
13 discern what is important and what isn't. I think it
14 will save everybody a lot of time.

15 MS. ELLIS: I think that's true. I think that
16 we can probably do it with a little less discussion
17 than we did before. Though the discussion was
18 interesting, I think it did take up quite a bit of time
19 back and forth.

20 MR. HORIN: What I would propose to do is that
21 we start, as we did before with a particular motion.
22 Mark, I don't know how you organized it, but if you
23 have it organized again by the statement of material,
24 perhaps I should just start going into it right now.

25 MR. BURWELL: Mark, would you speak up loud so

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1 my people in California have some chance of hearing
2 you.

3 MR. WALSH: Now, the first one would be the
4 ascension of U-bolts. In the first guide, I'm shown
5 there, would like the documentation that the stress
6 relaxation stops after you reach a certain level. For
7 A36 steel, that it is approximately 1/2 of the yield
8 stress.

9 MR. IOTTI: This is Bob Iotti. Can you hear me
10 Mark?

11 MR. WALSH: Barely, but I can.

12 MR. IOTTI: I don't know the documentation you
13 would like to have, but some of the documentation is
14 already provided as part of the test results. You can
15 see what happens to the screen in the U-bolt as the
16 stresses in the U-bolt exceed a certain level in where
17 the strain relaxation stops. In addition, I could refer
18 you to that reference, I believe it was quoted. Now, I
19 have to go back to the affidavit.

20 MS. ELLIS: Okay, Bob. Just a moment, before
21 you continue. Look through the documents that you have
22 provided, so if it is in there, and that is all that
23 you can provide on it, you don't really need to go into
24 the detail of that. Just tell us what is provided is
25 it.

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MR. IOTTI: What is provided is already in the document.

MR. HORIN: There is also a reference in the document, Bob, that Mark should look at?

MR. IOTTI: The results that are most illustrative are in the test results of...give me one second.

MS. ELLIS: I think you just faded out.

MR. IOTTI: I'm sorry.

MS. ELLIS: I think you just faded out.

MR. IOTTI: I'm sorry, Mrs. Ellis. I will try to speak louder, but I am already at the top of my lungs.

MS. ELLIS: I know.

MR. IOTTI: If you go to attachment one, you will see a lot of the results already in attachment 1.

MR. WALSH: So, what you are saying is that your whole conclusion is pretty much based on that conclusion. and pretty much based on that tasking that you have performed?

MR. IOTTI: No, that and that additional ASTM document that I referenced in the affidavit. I am trying to find the precise page where that is different. Look at page 25 of the affidavit, reference 11. The title is Calculation of Stress and Relaxation

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1 Engineering Alloys, ASP & Data Service Publications

2 GS-60.

3 MR. WALSH: Can we get a copy of that?

4 MR. IOTTI: The whole document is really
5 irrelevant. I can send you a copy of (inaudible).

6 MR. WALSH: Can you repeat that last part?

7 MR. IOTTI: It is a thick document, most of
8 which is totally irrelevant, because it refers to
9 alloys which have nothing to do with carbon, maganese,
10 silicon steel, such as A36. I can send you the section
11 of the documents which are relevant.

12 MR. FINNERAN: This is Jack Finneran, Mark.
13 Did you hear that? If not, I will translate.

14 MR. WALSH: Not that well.

15 MR. FINNERAN: He said that that document
16 would no be of any use to you becuase it concerns a lot
17 of other type materials than the ones that the U-bolts
18 were made out of. He will send you copies of the pages
19 that are pertinent to the U-bolts in question.

20 MR. WALSH: Alright.

21 MS. ELLIS: Was there anything else Bob, that
22 you need to say on this?

23 MR. IOTTI: No, Mrs. Ellis.

24 MS. ELLIS: Okay.

25 MR. WALSH: Okay. Number three.

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1 MR. IOTTI: Just a moment, Mr. Walsh. Let me
2 make a note of what I need to send you.

3 MS. ELLIS: I didn't understand that.

4 UNIDENTIFIED SPEAKER: Mr. Iotti said that he
5 wanted to make a not on what to send you.

6 MR. IOTTI: Go ahead.

7 MR. WALSH: The next item is number three.

8 UNIDENTIFIED SPEAKER: This is the statement
9 effect?

10 MS. ELLIS: Yes. All of these will be, unless
11 we tell you otherwise.

12 MR. WALSH: Okay. It is about a sample that
13 you looked at. We would like to know what criteria was
14 used to select the particular supports, how many of
15 these supports have the U-bolts cinch down after the
16 ground and root procedure before this cinching of
17 U-bolts came into effect, were in that sample. How the
18 random sample was selected, and how that random sample
19 is representative with the bolts, all the U-bolts in
20 the plant.

21 MR. IOTTI: This is Bob Iotti again. John, you
22 may have to help me out on that.

23 MR. FINNERAN: Mark, could you hear Bob?

24 MR. WALSH: Yeah. Bob, just keep speaking up.

25 MR. IOTTI: First of all, you have correctly

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1 stated the sample was random in the sense that we did
2 not choose any particular type of U-bolt. We chose
3 reasonably, with a criterion that said we should
4 C-bolt, not U-bolt in different sizes, in random areas
5 of the plant. In the affidavit, cable tubes, you will
6 have total number of U-bolts. It is broken down in the
7 number of U-bolts, and these bolts identified by size.
8 That is Table 2.

9 MR. WALSH: How many of these have been
10 inspected by QC for the torque values?

11 MR. IOTTI: John.

12 MR. FINNERAN: Bob, can you hear me?

13 MR. IOTTI: Yes.

14 MR. FINNERAN: Bob Iotti, can you hear me?

15 MR. IOTTI: Yes.

16 MR. FINNERAN: Okay. I'm at a little bit of a
17 loss here, because I can't find my statement of
18 material facts. So, tell me which sample we are talking
19 about.

20 MR. IOTTI: We are talking about sample of the
21 torque that are present in the cinched narrow U-bolt,
22 which were taken randomly in the...

23 MR. FINNERAN: In the field?

24 MR. IOTTI: February. His question is how many
25 of those U-bolts have been inspected through the

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1 Brownley Rhodes Procedure?

2 MR. FINNERAN: To the best of my knowledge,
3 all the U-bolts have been inspected.

4 UNIDENTIFIED SPEAKER: Mark, would you repeat
5 your question again for John?

6 MR. WALSH: My question was how many of the
7 U-bolts have been inspected for the torques that came
8 out in the brown root procedure, and were inspected by
9 QC?

10 MR. FINNERAN: Mark.

11 MR. WALSH: Yes.

12 MR. FINNERAN: This is John Finneran again.

13 MR. WALSH: Okay.

14 MR. FINNERAN: As I said before, to the best
15 of my knowledge, all of U-bolts that these samples were
16 taken on had been completed in construction, had been
17 bought off by QC.

18 MR. WALSH: Of the sample that you look at,
19 was there any type of reliability analysis performed
20 that one could extract the confidence level that the
21 supports would be stable with the ascension down
22 values, the torque values and cinching them down?

23 MR. IOTTI: Bob Iotti. I am not sure I
24 understand your question.

25 MR. BURWELL: Bob, Dr. Iotti. Spot Burwell

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1 here. May I make a suggestion. Would you talk very
2 carefully into your phone. It sounds like you are
3 turning your head away from the speaker very often.

4 MR. IOTTI: Well, unless you want me to take
5 the speaker out of my mouth...

6 MR. BURWELL: Thank you for your patience.

7 MR. IOTTI: Okay. I'm getting a sore throat
8 very quickly. Mark, let me see if I can answer your
9 question, because I am not sure I totally understand. I
10 think what you are driving at is have we established
11 every one of the supports that we sample. Is there a
12 sufficient torque applied to assure stability?

13 MR. WALSH: In a numerical sense.

14 MR. IOTTI: In a numerical sense?

15 MR. WALSH: Yes. You didn't test every one of
16 them. You only tested a sample.

17 MR. IOTTI: I understand. As a matter of fact,
18 we are telling you in the report that there may be some
19 the lowest range of torque of which may be below the
20 value in which stability in the sense that the support
21 won't move.

22 MR. WALSH: Okay.

23 MR. IOTTI: Might not be assured. That doesn't
24 mean in our minds the support is unstable in the sense
25 that it performs its functions. But, if you interpret

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1 stability as being support, it will not move. There
2 already are some in the range we have sampled which
3 will be below that level. That is why we have committed
4 to go back and inspect all of the stationery U-bolts to
5 make sure that the minimum value of torque exists. When
6 I say all, I mean all the stationery U-bolts.

7 MR. WALSH: Okay.

8 MR. IOTTI: That is in the affidavit.

9 MR. WALSH: Right. I remember. Now, the next
10 one is item number four.

11 MR. IOTTI: Does that answer your question?

12 MS. ELLIS: What?

13 MR. IOTTI: I was just wondering if my answer
14 satisfies Mr. Walsh on his question on three?

15 MR. WALSH: Yes.

16 MR. FINNERAN: Let's make it clear too, that
17 there is nothing that the applicant is to provide in
18 addition to what we just discussed. Is that correct? We
19 owe you no documents?

20 MR. WALSH: That's correct. Alright. The next
21 item is number four. This is relating sort of, to what
22 Dr. Iotti was just talking about. The second sentence
23 is therefore unlikely. How will one know from a
24 reinspection, that there has been an overtorqued
25 condition, and how does one come up to a percentile

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1 that saying, well, maybe only one percent will be
2 overtorqued.

3 MR. IOTTI: Okay, Mr. Walsh, if you will look
4 at table 2 on the affidavit, you will note that none,
5 zero, of the supports that were sampled were, in fact,
6 overtorqued. That is, whether they might have been
7 overtorqued to begin with or not, we don't think they
8 were. At the space when they were inspected, none of
9 them showed overtorquing. Now, I don't remember how
10 many total U-bolts we inspected, do you remember John?

11 MR. FINNERAN: No. I don't remember off hand,
12 Bob.

13 MR. IOTTI: I think, if I can find table 2. I
14 would say, roughly, 150 supports. Now, when you find
15 none of them overtorqued out of 150, you already have a
16 certain confidence that you have a high probability
17 that none of the others will be overtorqued.

18 MS. ELLIS: You just faded again.

19 MR. WALSH: I got it Juanita.

20 MS. ELLIS: I think that we understood your
21 answer, though.

22 MR. WALSH: Yeah.

23 MR. IOTTI: Is that sufficient, Mark?

24 MR. WALSH: Yeah. That is sufficient. The next
25 item will be number 5, item B. That is on Page 3, and

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1 it is in regards to the friction test.

2 MR. IOTTI: Yes.

3 MR. WALSH: Did this friction test include
4 cyclic thermal results. If not, I would like to see the
5 effects of cyclinc thermal results.

6 MR. IOTTI: The friction test did use the
7 electric load. The cyclic results, because one of these
8 specimens.

9 MS. ELLIS: I'm sorry. I can't hear you.

10 MR. BURWELL: This is Spot Burwell again. Bob,
11 may I suggest that I contact my operator again, and see
12 if, we can try to get a clear circuit on you.

13 MR. IOTTI: Let me relay my answer to John
14 Finneran, who also knows the answer. Maybe he can make
15 himself understood better.

16 MS. ELLIS: If you could do it in phrases,
17 sort of, that would probably work.

18 MR. FINNERAN: Well, that is going to take
19 twice as much time. Spot, if you can just to and use
20 another phone and call, and we will keep going.

21 MR. BURWELL: Let me see what I can work out
22 here.

23 MS. ELLIS: Spot. It seems like sometimes we
24 are hearing him alright and sometimes it fades.

25 MR. BURWELL: Yes. I am having the same

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1 trouble.

2 MR. IOTTI: Let me try again. Can you hear me
3 now?

4 MS. ELLIS: Sounds good now.

5 MR. IOTTI: We'll take advantage of the proper
6 airwave. There were on the ten inch scheduled for the
7 stainless steel pipe. Two tests were run. In one
8 instance, the friction test was the same U-bolt, the
9 same type. Eventually, the U-bolt is led by the
10 difference to cycling test, because the friction test
11 was repeated.

12 To compare the results of cycling effects on
13 friction, versus what we are going to expect the
14 friction to be on verging the pipe material and the
15 U-bolt material in different U-bolts placed on a
16 different section of that pipe or fuse. In fact, we did
17 see some difference in the friction.

18 MR. WALSH: Well, my statement, or my request
19 is to see documentation of a U-bolt on the friction
20 test that has exhibited, or excuse me, has experienced
21 the cyclic thermal action that a pipe support will see
22 at Comanche Peak, a direct correlation.

23 MR. IOTTI: Well, there is no.

24 MR. BURWELL: Dr. Iotti. This is Spot Burwell.
25 I have talked with my operator. If you will hang up,

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1 she will try ringing you back.

2 MR. IOTTI: Alright. Will do.

3 MR. BURWELL: Would you try that please.

4 (Brief recess.)

5 MR. IOTTI: Let me rephrase these questions.
6 We would like to have the test results for direct
7 correlation that shows friction between the U-bolt and
8 I formally cyclic thermal tests on the U-bolts. That
9 tests were not right. However, that chance was then
10 (inaudible) by a combination of tests that were
11 conducted on friction varying as the difference about
12 the free load posed on the U-bolt. The thermal driving
13 test shows how much free load is posed on the U-bolt
14 after it has been cycled. The last effect is to show
15 how much variability there is in friction due to
16 pollinate the effect. The population of those three
17 tests is what would enable us to determine, for
18 instance, in the final analysis, how much stress is
19 developed between the pipe and the U-bolt when the
20 torque is applied to the free load.

21 MR. WALSH: Why was it decided not to do a
22 test with friction and thermal cycling of loads?

23 MR. IOTTI: Simply, time consideration. You
24 have selected the number of tests that would encompass
25 a maximum continuation of all of the parameters that you

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1 wanted to take in a reasonable time.

2 MS. ELLIS: Anything further on that one,
3 Mark?

4 MR. WALSH: No. Item B on page 4.

5 MR. IOTTI: Go ahead.

6 MR. WALSH: Item B on page 4 is the next item.

7 MR. IOTTI: I got it, go ahead.

8 MR. WALSH: In the last sentence of the second
9 paragraph he says the decision to retain an adequate
10 clamping for it. What is meant by sufficient? And, how
11 do you know that it is sufficient?

12 MR. IOTTI: The results of the finite element
13 analysis and both the results of the tests where we ran
14 the seismic tests as well as the long term vibration
15 test with the minimum clamp supports.

16 MR. WALSH: But, that didn't include the
17 thermal tests, correct?

18 MR. IOTTI: What difference does that make. We
19 ran it at the minimum value of the clamping force.

20 MR. WALSH: Well, if the piping expanded, and
21 the clamps were relaxed, would there still be
22 sufficient clamping force?

23 MR. IOTTI: That has been determined. The
24 minimum clamping force that I am talking about, Mark,
25 after the pipe has done all of that it would be the

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1 clamping force that you are talking about. We
2 determined that from the kind of element analysis.

3 MR. WALSH: On page 6.

4 MR. FINNERAN: Does that mean you don't have
5 any more questions on that, Mark?

6 MR. WALSH: Correct. On page 6, item 6, it
7 references a manstran program. Is this the same program
8 that Dr. Bjorkman (phonetic) was talking about in the
9 last hearing?

10 MR. IOTTI: Quite possibly, Mark. There are
11 many versions of the program, and they are all called
12 manstran. This happens to be a particular version that
13 has certain capabilities. Now, as I recall, Dr.
14 Bjorkamn had not utilized a manstran for his analogies
15 either. He utilized (inaudible).

16 MR. WALSH: The is not the same analysis that
17 Dr. Bjorkamn was discussing then, correct.

18 MR. IOTTI: This was not the same analysis. We
19 are discussing here, afforded in attachment 3 is the
20 totally independent analysis that CYGNA had done.

21 MR. WALSH: Alright. On page 7.

22 MR. FINNERAN: So, we are all clear on that
23 one, Mark?

24 MR. WALSH: On page seven, item two.

25 MR. IOTTI: I don't have an item...oh, sorry,

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1 go ahead.

2 MR. WALSH: It states maximum stress in the
3 U-bolts are the results of the worst case load
4 combination evaluated compared favorably with test
5 results demonstrated that stress in the U-bolts will
6 not cause any adverse impact. Did these stresses exceed
7 code allowables?

8 MR. IOTTI: I have to go back now and turn to
9 the affidavit. Give me a second. The stresses
10 calculated in the U-bolt are given on page 48 of the
11 affidavit, Table C. I don't have them, John, what is
12 the code allowable for those U-bolts. Do you remember?

13 MR. FINNERAN: No, Bob. Not off the top of my
14 head I don't.

15 MR. IOTTI: That's my problem right now. I
16 don't remember right off the bat whether we could have
17 at least the instance of the floor range 160 has
18 exceeded the code allowables. You understand, of
19 course, that is with a maximum free load that we don't
20 expect to have. It is a maximum that we chose to
21 analyze with.

22 MR. FINNERAN: Isn't that something that Mark
23 could check on as easy as us, now that he knows where
24 the particular stress level.

25 MR. IOTTI: I think he could check it himself.

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1 MR. WALSH: Okay. Alright, my next questions
2 was the stresses within the pipe, which is item 3. How
3 does one know that that won't have an adverse impact
4 on the piping system?

5 MR. IOTTI: We have analyzed the stresses in
6 the pipe. We have looked at two different manners in
7 assessing whether the stresses could cause the problem.
8 In either case, we will review that the stresses were
9 acceptable, or are acceptable at maximum free load
10 level. You understand the tool gives you no direct
11 guidance of this.

12 MR. WALSH: Wouldn't these stresses be added
13 to the pipe stresses?

14 MR. IOTTI: They were added. The stresses
15 already present in the pipe were added to the stresses
16 produced by the clamping action on the U-bolt.

17 MR. WALSH: In all cases?

18 MR. IOTTI: In all of the four cases examined.

19 MR. WALSH: No, I'm discussing the piping
20 systems at Comanche Peak that are in place.

21 MR. IOTTI: We added the largest values of the
22 stresses whether they occur at the same point of U-bolt
23 or not. We were conservative for, of course the pipe
24 sizes, that were available.

25 MR. WALSH: And, they will be using these

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1 values, these additional stresses when they perform the
2 stress analysis?

3 MR. IOTTI: The values were added absolutely.
4 So, you can calculate it independently. Previous
5 analysis of piping systems were examined to determine
6 what were, what could be the maximum value of the
7 stresses, regardless of where they occur, though they
8 had to occur in the piping because that is where we
9 have H-bolts. Now, you take the maximum value for the
10 particular pipe size, and then added that value to
11 whatever stresses were being calculated by, and I
12 shouldn't talk in stressing densities here, not
13 stresses. They were added to the stresses calculated by
14 the finite element analysis.

15 MR. WALSH: Okay. Will these stresses be added
16 when Gibbs and Hill do their stress analysis
17 evaluation?

18 MR. IOTTI: No. They have been added now.
19 Gibbs and Hill have already done their analysis. We
20 have no intention to go back and add these stresses on
21 top of Gibbs and Hill. What we did was added Gibbs and
22 Hill on top of these. The two results are the same.

23 MR. FINNERAN: I think to make it clear, the
24 purpose of the analysis and testing that we did was to
25 demonstrate the adequacy of what had been done. There

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1 is no intention to backfit all the stress analysis to
2 add stresses in that we don't ever agree that was
3 required to be considered. It was clearly to
4 demonstrate the acceptability that we had.

5 MR. IOTTI: Dave. Bob Iotti. Even if we were
6 to do it the other way, as Mark suggests, for us to
7 take the stresses and give them to Gibbs and Hill for
8 them to add, they would come to the same conclusions.
9 They would add it just as we did, and then they would
10 be faced with the task of determining what the code
11 allows. They would go through the same type of
12 exercise. So, we just went the other way. We took Gibbs
13 and Hill stresses and added them to ours, and made the
14 same determination.

15 MR. WALSH: Okay. I think that clarifies it.

16 MS. ELLIS: Okay, anything further on that
17 one?

18 MR. FINNERAN: No.

19 MR. WALSH: Alright. On page 9, item 13, the
20 first sentence. We would like to see some documentation
21 for the criteria that why these original support
22 designs were intentionally cynched down, the U-bolts.

23 MR. IOTTI: John Finneran.

24 MR. FINNERAN: Yes.

25 MR. IOTTI: Can you provide that?

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1 MR. FINNERAN: Tell me what the first sentence
2 says, someone.

3 MR. WALSH: A significant number of U-bolt
4 supports at CPSES were ultimately contended to be
5 cynched down.

6 MR. FINNERAN: Well, the documentation for
7 that Mark, would be all the drawings when they were
8 initially released showing zero clearance between the
9 U-bolts and the pipe.

10 MR. WALSH: I would like to see calculations
11 showing that this needed to be performed in the
12 original design calculations.

13 MR. FINNERAN: These U-bolts were always
14 intended to act as clamps. They were assumed to be the
15 same as pipe clamps attaching to the pipe. You won't
16 find any calculations in a support documentation about
17 these clamping for pipe supports, either.

18 MR. IOTTI: Well, let's not be too hasty. You
19 will probably find the criteria or...

20 MS. ELLIS: I'm sorry. We can't hear you at
21 all now.

22 MR. WALSH: I'm sorry. We are losing that
23 completely now.

24 MR. IOTTI: I would just like to expand on
25 John Finneran's answer. John, wouldn't you find on

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1 those supports which were always intended to be cynched
2 down, the (inaudible) in the old calculations would
3 assume that there is no free expansion actually in that
4 direction, or sufficient thermal expansion to be given
5 in any other direction.

6 MS. ELLIS: John, if you can hear him can you
7 tell us what he said. We couldn't hear it.

8 MR. FINNERAN: I will have to apologize,
9 because I lost it too, Bob. Try one more time.

10 MR. IOTTI: John. Where you have the cynched
11 down U-bolts, always intended to be cynched down,
12 wouldn't you expect no axial thermal movement?

13 MR. FINNERAN: Okay. Bob said that where I had
14 these, where we had these U-bolts always cynched down,
15 would we expect no axial thermal movement.

16 Bob, can you hear me?

17 MR. IOTTI: Yes.

18 MR. FINNERAN: These particular U-bolts, Bob,
19 are used on single struttts and snubbers.

20 MR. IOTTI: Okay. You can't exceed more than
21 the movements of...that the snuffer or the strutt
22 permits you, right?

23 MR. FINNERAN: That's correct.

24 MR. IOTTI: Forget my question.

25 MR. FINNERAN: I guess I am having trouble

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1 connecting that up with Mark's question, Bob.

2 MR. IOTTI: Well, he was asking what criterion
3 would you use to select when you would cynch them down
4 from A-1 versus, you know, not cynching them down.

5 MR. FINNERAN: Yes. I think he asked me if
6 there were any calculations in the original design of
7 these reports related to the cynching down of these
8 U-bolts. Is that correct, Mark?

9 MR. WALSH: Yes. There is none, correct?

10 MR. FINNERAN: I would say that there is none.
11 These were to be assumed to be pipe support clamps, and
12 there would be none for clamps either.

13 MS. ELLIS: Anything further on that?

14 MR. WALSH: Yeah. There is an end of item
15 number 13, there is a reference to go back to the
16 affidavit at 5. And, at page 5, the last paragraph,
17 table 1 is a partial list of supports. We would like to
18 have the complete list.

19 MR. HORIN: What is this a list of?

20 MR. WALSH: It is a listing of the reports
21 that are cynched down at CPSES.

22 MR. HORIN: Mark, to get back to my point
23 earlier, is a list of particular material to anything
24 that needs to be responded to. Is there some technical
25 information that can be drawn from a list that would be

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1 helpful in responding? Okay, just a moment Darrel.

2 MR. WALSH: We would like to have the ones
3 that were excluded for the larger pipe sizes, which
4 have less intense sub supports. In other words, what I
5 am asking for is those ten.

6 MR. IOTTI: Well, this list was compiled as
7 follows. John.

8 MR. FINNERAN: I'm listening.

9 MR. IOTTI: Okay. If there were more than 10
10 supports for that piping size, 10 supports. Then, we
11 listed the ten most heavily loaded.

12 MR. FINNERAN: That's correct.

13 MR. IOTTI: Okay. Where you do not see 10,
14 there aren't ten. What you see is what you have.

15 MR. HORIN: Okay. John, repeat that for Mark.
16 Could you hear that, Mark?

17 MR. WALSH: Very little.

18 MR. FINNERAN: What Bob said is the list you
19 have for a particular pipe size is a listing of the
20 highest loaded supports for that size. If there are
21 less than 10, then that is all that there is on that
22 pipe size.

23 MS. ELLIS: Oh. Are you saying that even
24 though that there is less than 10, that those 9 or
25 however many there are are still listed?

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1 In other words, they are included in the
2 table? Is that correct?

3 MR. FINNERAN: What we are saying is that for
4 each pipe size, this list was to list the 10 highest
5 loaded supports for each pipe size. If on this list
6 there are less than 10 supports listed, then that is
7 all the supports of that size for cynched U-bolts.

8 MS. ELLIS: Right. The way this was worded, it
9 sounded as though these larger pipe sizes which have
10 less than 10 were excluded in some way. That is not
11 what you are saying?

12 MR. FINNERAN: No.

13 MS. ELLIS: They are still on the list, there
14 is just not ten of them, right?

15 MR. FINNERAN: Yeah. For instance, 514. There
16 are only two. We didn't delete any. There are only two
17 on 14 inch piping.

18 MS. ELLIS: Okay. That is what...that is
19 alright.

20 MR. FINNERAN: Adequate for you, Mark?

21 MR. WALSH: That finishes up cynched up
22 U-bolts.

23 MS. ELLIS: Okay, next will be the axial
24 restraints.

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1 MR. WALSH: Item one. I would like in item
2 one.

3 MR. IOTTI: Hold it. I have got to get my
4 file.

5 MS. ELLIS: We will take a second for
6 everybody to get their documents together.

7 MR. IOTTI: Can I take one minute for a drink?

8 MR. WALSH: Good idea. The material facts of
9 the actual restraints, we request documentation on the
10 applicants procedure on modeling trunyan (phonetic).

11 MR. IOTTI: You were right, John.

12 MR. FINNERAN: I'm sorry. I just got back in
13 the room.

14 MR. IOTTI: Mark is asking for documentation
15 of the procedures that here utilizes the model, the
16 trunyan. It is on item one of the material facts.

17 MR. FINNERAN: Alright, let me look at it.
18 We'll just have to look into it.

19 MR. IOTTI: Mr. Walsh, I guess we will have to
20 provide it to you in narrative form, or the procedure,
21 if an actual procedure in an actual environment.

22 MR. WALSH: Item number four, page two.

23 MR. FINNERAN: Let me clarify that last one.
24 Are ou looking for a copy of the procedure, is that
25 correct?

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1 MR. WALSH: Yeah. In which describes how they
2 are modeling the trunyan.

3 MR. FINNERAN: This is the Gibbs and Hill
4 procedre?

5 MR. WALSH: Gibbs and Hill and Westinghouse.
6 Both of them. If they are the same, it is either one.

7 MR. IOTTI: Okay. We will get back to you on
8 that.

9 MR. WALSH: Item four. We would like to see
10 the drawing which demonstrates the largest difference
11 when one considers the rotational effects on the
12 support compared to when there is no rotation effects
13 considered.

14 MR. IOTTI: Now, here you say drawings?

15 MR. WALSH: Pardon?

16 MR. IOTTI: Did I hear you say drawings?

17 MR. WALSH: Yes, drawing and calculations.

18 MR. IOTTI: I guess what I am a little
19 confused about is what do you mean by the largest.

20 MR. WALSH: Well, in the last sentence it says
21 that these loads did not exceed applicable allowables.

22 MR. IOTTI: Okay.

23 MR. WALSH: Therefore, a comparison had to be
24 made on all the supports.

25 MR. IOTTI: That is correct.

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1 MR. WALSH: We would like to see where the
2 largest comparison occurred. We would like to see that
3 drawing and the calculation.

4 MR. IOTTI: Okay. It will take us just a while
5 to go through and identify the particular ones that had
6 the largest change, and select that particular support
7 and provide you with a drawing. Is there any problem
8 with that, John?

9 MR. FINNERAN: None, except that we are flying
10 out tomorrow for a meeting with the NRC. So, we will
11 try and get to it as quickly as possible.

12 MR. IOTTI: When I say quickly, Mr. Walsh. It
13 is assumed that you will understand that it will
14 probably be no earlier than Monday of next week,
15 because we will be in Washington the remainder of this
16 week.

17 MR. WALSH: Right. Well, try to do the best
18 you can.

19 MR. FINNERAN: We'll try and get something
20 moving on it tomorrow.

21 MS. ELLIS: Okay.

22 MR. WALSH: Okay. Item Number 5. We would like
23 to see the calculations to support CT-1-013-023.

24 MS. ELLIS: Slow down, do that again, slowly.

25 MR. WALSH: We would like to see the

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1 calculations on CT-1-013-023-S42K.

2 MR. FINNERAN: Let me play it back to you,
3 Mark. CT-1-013-023-S42K.

4 MR. WALSH: Yeah.

5 MS. ELLIS: Do you want the calculation of
6 drawings?

7 MR. WALSH: Yes, showing that they have taken
8 into account the double trunyan effect.

9 MR. IOTTI: Okay.

10 MR. WALSH: And, if it is shown on the
11 drawing.

12 MR. FINNERAN: That what is shown on the
13 drawing?

14 MR. WALSH: The load due to the double trunyan
15 effect.

16 MR. IOTTI: The answer is no. It will not be
17 shown on the drawing.

18 MR. FINNERAN: Did you hear that, Mark?

19 MR. WALSH: No sir.

20 MR. FINNERAN: The load on the drawing will
21 not be the load that reflects the double trunyan
22 effect.

23 MR. WALSH: Why is that?

24 MR. IOTTI: Because we don't believe that is
25 the best way of modeling the double trunyan. We have

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1 told you how both Gibbs and Hill and Westinghouse have
2 modeled the double trunyan. What we have then done with
3 the affidavit is attempt to prove to you even had we
4 modeled this, the way that you would like us to, the
5 load has been computed for each leg of the trunyan
6 would still be within the scope.

7 MR. WADE: I think this again is the case
8 where we have provided additional information to back
9 up the judgements engineering has done previously. We
10 feel that it is justified and we have no intention of
11 updating all of the record calculations and drawings in
12 the field. We did this entire effort simply because the
13 assurance of what we had done was a good judgement in
14 engineering practice.

15 MR. WALSH: Okay. Alright. I'll leave it at
16 that.

17 MR. WADE: Do we still agree to supply those
18 calcs?

19 MR. WALSH: Yes. I would still like to see
20 those calculations for that particular support.

21 MR. FINNERAN: You understand that this was
22 only a special calculation for this particular case.

23 MR. WALSH: Yeah.

24 MR. FINNERAN: It's not the calculation of
25 record for this support.

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1 MR. WADE: Nor, will it be.

2 MR. FINNERAN: Nor will it be.

3 MR. IOTTI: We will label it as such.

4 MR. FINNERAN: Do you understand that, Mark?

5 MR. WALSH: Alright. We would like the latest,
6 as well as the ones, the effects when it was modeled as
7 a double trunyan.

8 MR. FINNERAN: I didn't understand that.

9 MR. WALSH: Well, didn't Gibbs and Hill
10 reanalyze this, let's say the CG line. Has this support
11 been a double trunyan?

12 MR. WADE: Mark. We have given you a special
13 analysis that we did especially for this effort. It is
14 not the calculation of record, nor do we intend for it
15 to be. We are simply doing this to demonstrate that
16 what our initial engineering practice was, was
17 justified. This is a special calculation done only for
18 purposes of these discussions.

19 MR. WALSH: Well, did Gibbs and Hill reanalyze
20 that line as a double trunyan?

21 MR. IOTTI: The answer, Mr. Walsh, either one
22 or two.

23 MR. WALSH: Speak up, please.

24 MR. IOTTI: I don't remember that specific
25 support in that particular line. It may be that that

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1 support is a support on one of the lines that Gibbs and
2 Hill reanalyze as part of the substantial reanalysis
3 for the purpose of this affidavit. Or, the support was
4 reanalyzed by itself by using a manual method to
5 compute the increase in load through trunyon effect in
6 a conservative manner. So, in either case in analysis
7 or reanalysis of the report was perfected. I just don't
8 remember which one of the two this particular support
9 would fall into. But, in either case, we can provide
10 the special calculation.

11 MR. FINNERAN: Did you understand that, Mark.

12 MR. WALSH: I believe so, I have another
13 question. So, the applicants did not reevaluate the
14 supports using pipe stress analysis loads, but another
15 method, correct?

16 MR. FINNERAN: Some supports were evaluated in
17 this special study using the output of analyses that
18 did have these modeled in as double trunyans. Some,
19 conservative loads were generated manually to analyze
20 them. They were not the result of any additional piping
21 analysis that was done.

22 MR. IOTTI: Bear in mind that the manual
23 method is guaranteed to produce conservative results.

24 MS. ELLIS: Okay. Did you want anything about
25 the drawings and calculations on this particular

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1 support, still, Mark?

2 MR. WALSH: Yeah. Please.

3 MR. HORIN: Mark, let me repeat what I
4 understand you are asking for here. That is, simply
5 whatever recalculation might have been done for our
6 affidavit, with respect to the support, whether it
7 might have been a reanalysis as part of the piping
8 stress, or whether it was a manual method that Dr.
9 Iotti is describing.

10 MS. ELLIS: And you will indicate which,
11 alright?

12 MR. HORIN: It would be obvious.

13 MR. WALSH: Alright. Let's move on to item
14 number seven. We would like to see some documentation
15 showing that the applicants are in compliance with the
16 ASME code when it comes to these logs and the stresses
17 that it induces into the piping system. This is the
18 localized stresses if they are wstill within the
19 allowables.

20 MR. IOTTI: I thought the documentation had
21 been provided as part of the examples of finite element
22 analysis that we had given you as attachment one to the
23 affidavits.

24 MR. WALSH: Okay. That is sufficient. That is
25 all I have on the axial restraints.

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1 MR. FLECK: Spot, this is Hank Fleck here.

2 MR. BURWELL: Yes.

3 MR. FLECK: It sounds like the two items that
4 I am involved in have been covered, so I am going to
5 hang up here.

6 MR. BURWELL: Okay, fine. I take it John
7 Brammer dropped off earlier.

8 MR. BRAMMER: No. I'm still here, but I'm
9 dropping off now.

10 MR. BURWELL: Good night, gentlemen. We will
11 see you Wednesday.

12 MR. FLECK: Right. Bye.

13 MR. BRAMMER: Thank you.

14 MR. IOTTI: As a point of information, Spot.

15 MR. BURWELL: Yes.

16 MR. IOTTI: What time is the meeting on
17 Wednesday?

18 MR. BURWELL: Nine o'clock.

19 MR. IOTTI: I also ask where?

20 MR. BURWELL: Oh, certainly, I think it is in
21 room 1713 Maryland National Bank Building.

22 MR. IOTTI: Okay. Thank you.

23 MR. FINNERAN: Okay. Do we take up Richmond
24 inserts next?

25 MR. WALSH: Yeah.

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MR. IOTTI: Let's hear it, I've got to get the Richmond insert document. Don't fire yet...Fire away.

MR. WALSH: Okay. This relates to items 4 and 5 on page 2 of the material facts. We would like to see documentation showing that Richmond Screw Anchor company has a quality assurance program, that the inserts used in EPSCS are a reflection of the tests that were performed in 1957.

MR. IOTTI: Excuse me, Mr. Walsh. I don't seem to be able to find this material.

MS. ELLIS: Can't hear at all.

MR. FINNERAN: Dr. Iotti is saying he cannot find his material facts, and I can't either. Bob Iotti.

MR. IOTTI: Yes.

MR. FINNERAN: I believe in my stack, it was the very last document, even after all of the attachments.

MR. WADE: Motion affidavit even after the statement of fact.

MR. IOTTI: Mine doesn't have it so, John. Do you have it?

MR. FINNERAN: I believe so.

MR. IOTTI: Well, would you fall along, and I will try and come in as best as I can.

MR. FINNERAN: Okay.

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MR. WALSH: Should I restate the question?

MR. FINNERAN: Yes.

MR. WALSH: We would like to see documentation showing the Richmond Screw Anchor Company has a quality assurance program, such that the inserts used at CPSES are a reflection of the tests performed back in 1957.

MR. FINNERAN: Let me write that down.

MR. WADE: John, is that something that we have or something that we have to obtain?

MR. FINNERAN: That would probably be something we have to obtain. The only connection that I can see in the current documentation that we have, the facts, the same type of insert is referenced, the EC type.

MR. WADE: Are we making a material statement here that this is a fact?

MR. FINNERAN: No.

MR. HORIN: What do 4 and 5 of the statement of material facts say?

MR. FINNERAN: It doesn't say anything about that. It says, really, it is a listing of the allegations of CASE, that they raised allegations related to number one, the factor of safety use for Richmond inserts, number two the testing of Richmond inserts, Number 3, the ability of Richmond inserts to

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1 resist actual torsion. Number 4, the methods used to
2 analyze connections.

3 MS. ELLIS: We are talking about items 4 and 5
4 on page two.

5 MR. FINNERAN: Oh. I'm sorry. I thought you
6 were talking about items 4 and 5, and Item 1.

7 MS. ELLIS: Okay.

8 MR. FINNERAN: Alright. Well, the
9 documentation there would be the recommended allowable
10 loads in the Richmond Screw Anchor catalog for the type
11 of inserts we are talking about.

12 MR. WALSH: Yeah. But, we are requesting
13 documentation showing that the Rich, that the anchors
14 that they are producing now, is still a reflection of
15 the test back in 1957.

16 MR. HORIN: John. Does the additional testing
17 that ew performed demonstrate that the anchors were at
18 least as strong if not stronger.

19 MS. ELLIS: You lost me on the last part
20 there.

21 MR. FINNERAN: I think Bill Horin is saying
22 that the additional testing we have done shows that the
23 anchors are at least as strong or stronger than the
24 previou 1957 test.

25 MR. HORIN: So, my question is how is the

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1 request you are making, Mark, really material to the
2 ultimate issue?

3 MR. WADE: Well I think that that is the
4 thing, Bill. But, it is also true that Richmond
5 represents in their most recent catalog the same data.
6 That, in itself states it there behind the test data
7 produced in 1957.

8 MR. WALSH: So, Richmond does not test these
9 anchors when it makes them. It just sends them out and
10 just assumes that they are as good as some time ago.

11 MR. WADE: We didn't say that they didn't have
12 a destructive test periodically. That is something that
13 would have to be confirmed. But we know from our test
14 data that the numbers good.

15 MR. HORIN: My point is Mark, that
16 irrespective of what Richmond does, the purpose of our
17 affidavit was to demonstrate the capacities of the
18 Richmond in various loading combinations, and we did
19 our own independent tests. That is really what we are
20 relying on in our affidavit.

21 MR. WALSH: Alright.

22 MR. HORIN: Bob, correct me if I am wrong.

23 MR. IOTTI: I think you are right.

24 MS. ELLIS: Really in effect, you are saying
25 that what you are saying in items 4 and 5, you are not

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1 relying on?

2 MR. HORIN: Well, I'm not saying that either.
3 I am saying whether I am questioning Mark's request is
4 really important to the ultimate question given what
5 our tests have shown.

6 MS. ELLIS: I think is only important as far
7 as the fact that you have put it in your affidavit
8 here, and in your material facts. It is something that
9 we have to address. If you are relying on it fine. If
10 you are not relying on it, we will forget it.

11 MR. IOTTI: Bill or John, would you read me
12 statement 4 and 5 of material facts?

13 MR. FINNERAN: Okay, Bob. Statement 4 says
14 the current allowable recommended load for the inserts
15 by the Richman Screw Anchor Company are based on tests
16 conducted at the Polytechnic Institute in Brooklyn in
17 1957.

18 MR. IOTTI: That is correct.

19 MR. HORIN: Yes, Mark. Your question has no
20 bearing as to whether that statement is true or
21 correct. We stand on that statement irrespective of
22 your question. Number 5, John.

23 MR. FINNERAN: Number five says, data from the
24 manufacturer's test reflect a failure in all sheer
25 tests and the 1-1/2 inch tension test of card due to

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1 failure of the anchor stud bolts, not failure of the
2 inserts. Failure in the 1" tension test occurred due to
3 the failure of the inserts by concrete cone pullout.

4 MR. IOTTI: That is correct. That statement
5 that shows that can be made available.

6 MS. ELLIS: I couldn't hear the last part of
7 what he said.

8 MR. FINNERAN: He said that that statement of
9 material fact is correct, and has added to substantiate
10 that can be given to you. I think you may already have
11 it. It is in the record.

12 MS. ELLIS: If it as the same that is attached
13 to 142, do you have 142?

14 MR. FINNERAN: Part of it. I am not sure if
15 142 has the 1-1/2 inch and the 1". Part of it does.
16 Part of it is in 142.

17 MR. WALSH: Okay. Let's go on.

18 MR. HORIN: You don't need anything else then,
19 Mark.

20 MR. WALSH: No. Item 7 on page 3. We would
21 like to see documentation showing the applicants,
22 structure designers and/or engineers to check the
23 capacity of the threaded rod. Also, verification of
24 threaded rod capacity as judged, for example, in
25 support number MS-1-02-003-C72S from NPSI. We would

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1 like to see the original calculations with the original
2 drawings that would verify that the AGE seven bolts is
3 checked or the bolt that is utilized there is checked.
4 We would like to see an example from the PSG group
5 original design prior to 1982, or June of 1982.

6 One ITT Grinnel original calculation as it
7 was sent out showing that they checked the bolt
8 capacity as well as the moment limiting restraints that
9 was discussed in the hearing. The calculation is
10 performed by Gibbs and Hill. We would like to see the
11 original calculations showing that the Richmond inserts
12 that were utilized that review was checked.

13 MR. HORIN: John.

14 MR. FINNERAN: I'm trying to write all of this
15 down.

16 MS. ELLIS: Do you need for us to go through
17 it a little slower?

18 MR. IOTTI: I think what he is really saying
19 is please do the calculations and indicate what
20 consideration was given to the allowables.

21 MR. WADE: Dr. Bob, we can't hear you at all.

22 MR. IOTTI: Did I hear you say no?

23 MR. FINNERAN: Yeah. Now we can hear you.

24 MR. WADE: We couldn't hear you at all.

25 MR. IOTTI: I said that I think that what he

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1 is asking is in an abbreviated way for us to produce
2 calculations for each of the designers, VSE, ITT, and
3 NTSI, that shows that they have considered the minimum
4 of either the insert or the bolt, whichever is left in
5 terms of designing the support.

6 MR. WALSH: In the original designs prior to
7 1982.

8 MR. FINNERAN: Okay.

9 MR. WADE: John, we are agreeing to provide
10 that?

11 MR. FINNERAN: Well, I don't. I think we
12 already have in the record the allowables from SS30. I
13 assume he asking for some kind of backup calculation on
14 those.

15 MR. WADE: Looking for examples from each
16 organization, Gibbs and Hill, ITT, VSE and MPSI that
17 they in fact did check the accuracy of the threaded
18 rods in the original design counts. Is that correct,
19 Mark?

20 MR. WALSH: As well as pipe support labeled
21 MS-1-02-003-C72S. I believe that is an NTSI support,
22 but I am not sure. And, the calculations on limiting
23 restraint that is done by Gibbs and Hill that was used
24 in these hearings.

25 MR. WADE: I'm not sure which specific moment

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1 restraint we are referring to. I know we have discussed
2 moment restraints in the hearings. Do you have one
3 particular one in mind that you can identify?

4 MR. WALSH: I believe we only looked at one in
5 the hearing.

6 MR. FINNERAN: Can you give us some additional
7 guidance as to what context it was, something to
8 identify.

9 MR. WALSH: It utilized also, Richmond
10 inserts.

11 MR. WADE: I recall one such case where we
12 discussed it. I believe there were numerous cases that
13 were brought up at the same time. Do you have a drawing
14 number or anything?

15 MR. WALSH: It is incorporated in Jack
16 Doyle's exhibit, or CASE's exhibit tract oil drawings.

17 MS. ELLIS: Okay. Why don't we try to find
18 that drawing number and let him know what it is.

19 MR. WALSH: Okay.

20 MR. FINNERAN: I think I know which one it is.

21 MS. ELLIS: You know which one it is, John?

22 MR. FINNERAN: Yes.

23 MS. ELLIS: Okay.

24 MR. WALSH: That will finish the Richman.

25 MS. ELLIS: Next will be stability, I guess.

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1 MR. FINNERAN: Do you have your file, Bob?

2 MR. IOTTI: Just a second, I am reasonably
3 organized.

4 MR. FINNERAN: I say more than reasonably
5 organized.

6 MR. IOTTI: I sure would like to know what
7 happened to the material package to Richmond. Bring an
8 extra copy, will you?

9 MR. WADE: John's unstapled the mat.

10 MR. BURWELL: Gentlemen?

11 MR. FINNERAN: Yes.

12 MR. BURWELL: I believe we have identified
13 that moment restraint you were talking about a minute
14 ago.

15 MS. ELLIS: Okay.

16 MR. BURWELL: It is 699B Doyle deposition, 9Q.

17 MS. ELLIS: 9Q?

18 MR. BURWELL: 9Q. It continues on 9R.

19 MR. MIZUNO: It was more than one page.

20 MR. BURWELL: It is bound in the transcript of
21 May 17, 1983. I believe it is bound in following page
22 6224.

23 MR. WADE: That will help.

24 MR. WALSH: Okay. Alright, on stability, I'm
25 going to material facts again. Item number 3. We would

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1 request documentation to an explanation for the reason
2 there were unstable supports to begin with.

3 MR. FINNERAN: We haven't said there were any
4 unstable supports.

5 MR. WALSH: In item 4, it states a hold was
6 placed on a further design to this type of support.

7 MR. FINNERAN: Potential instability.

8 MR. WALSH: To accept whether or not they
9 were. So, we would like an explanation, then why would
10 a support designer issue a support that was potentially
11 unstable in the first place.

12 MR. FINNERAN: I think we explained here that
13 these potentially unstable back frame supports were not
14 designed by the original designer. They were field
15 modifications made by the field engineers.

16 MR. HORIN: We provided the documentation with
17 the motion and affidavit placing the hold on further
18 designs of that type by the field engineer, following
19 through on the assessment of whether they made...

20 MR. WALSH: Alright. I will go right on to
21 item number 4.

22 Were there any classes or sessions or
23 instructions provided to the engineers to show them
24 what an unstable support was? The field engineers.

25 MR. FINNERAN: The field engineers, is that

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1 what you said?

2 MR. WALSH: Yes.

3 MR. WALSH: John.

4 MR. FINNERAN: Just a second. I don't know of
5 any formal classes or instructions that were given to
6 the field engineers as a result of identification of
7 these box frames. The potential problems with these box
8 frames were communicated verbally amongst the field
9 engineers.

10 MR. WALSH: So, what is meant by a hold was
11 placed on approval? What is meant by a hold. Is that a
12 CNC NCR?

13 MR. FINNERAN: A hold means that none of the
14 supports would be approved by the original designer
15 until the potential has to build the issue has to be
16 resolved.

17 MR. WALSH: How does one know that the support
18 was stable or not. How did Comanche Peak put a hold on
19 the supports. Did they already know which ones were and
20 which ones weren't and they immediately put a hold on
21 every one of them?

22 MR. FINNERAN: I think Mr. Abeley's (phonetic)
23 letter says that supports of this type, of the box
24 frame type, as he indicated in his memo would be put on
25 hold.

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1 MS. ELLIS: What their hold tag applied?

2 MR. HORIN: No. Juanita, this is simply a hold
3 in the approval process. The memorandum that we
4 provided with the motion shows the written direction
5 that this hold be placed on the approval, on this
6 particular type of support. There is no need to do
7 anything in the field. It is in the approval process
8 back in the office. This memorandum gets in that
9 direction, and all parties that were required to be
10 aware of that were made aware of that. The
11 determination as to whether these supports may, in fact
12 be unstable was then conducted separately.

13 MR. WALSH: Was this hold method, or method of
14 holding a method of trending?

15 MR. WADE: I think we are getting a feel for
16 the subject here, aren't we Bill.

17 MR. FINNERAN: No. We simply listen to the ITT
18 engineers until the issues were involved with these
19 supports. None of these supports were to be approved.

20 MR. WALSH: Did TSE have any of these
21 problems?

22 MR. FINNERAN: All of the supports were ITT
23 supports.

24 MS. ELLIS: I'm not sure I understand you. Did
25 you say that all of the supports were ITT?

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1 MR. HORIN: They were all on ITT design, John
2 believes.

3 MR. WALSH: NTSI had no unstable supports? Is
4 that correct, John? Is that what you are saying?

5 MR. FINNERAN: We haven't said that anybody
6 had any unstable supports there, Mark.

7 MR. WALSH: Well. We are talking about this
8 hold. Now, did this hold apply to, also to the NTSI
9 supports?

10 MR. FINNERAN: This hold that we are talking
11 about here is a hold that was placed on by Gus Aveley
12 of ITT. It was a hold against the box frame pipe
13 supports. All of those were on ITT design.

14 MR. WALSH: Did that include NTSI supports?

15 MR. FINNERAN: No. That hold was not on any
16 design by NTSI. Mr. Aveley was with ITT.

17 MR. WADE: I think what John said is that
18 there were no NTSI supports that fell in that category,
19 nor was there any TSE supports that fell in that
20 category.

21 MS. ELLIS: That's what we were asking him.

22 MR. WALSH: So, the only documentation to this
23 is this letter? Is this letter attached to the motion?

24 MS. ELLIS: For the affidavit.

25 MR. HORIN: I believe there were two

1 memorandums with the affidavit.

2 MR. WALSH: Which one is that?

3 MR. FINNERAN: Attachment A-1 to the
4 affidavit.

5 MS. ELLIS: To the affidavit.

6 MR. WALSH: Just a moment. I can't find that.
7 A-1?

8 MR. FINNERAN: Second page.

9 MR. WALSH: This is the bi-weekly report?

10 MR. IOTTI: Yes.

11 MR. FINNERAN: That's it. Number CG36.

12 MS. ELLIS: Okay.

13 MR. WALSH: This is the item where he orders
14 his pens and pencils, right.

15 MR. FINNERAN: I don't know what you are
16 talking about. The statement that we are talking about
17 is page 2, item 6, the last sentence.

18 MR. WALSH: And it is dated May 22?

19 MR. FINNERAN: No. Yes, dated May 22. Right,
20 1981...

21 MR. WALSH: Now, dated, on attachment 3, and
22 it is dated 4-2-82.

23 MR. FINNERAN: Right.

24 MR. WALSH: How would this letter reflect that
25 hold?

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1 MR. FINNERAN: Attachment A, that's one. It
2 saysthat technical services of all supports using box
3 structures as attachments until written procedure or
4 approval from provident is received.

5 MR. WALSH: Yeah.

6 MR. FINNERAN: In attachment A-2 reiterates to
7 the ITT home office that they are requesting
8 assessment to the situation of ITT home office,
9 assessment A-3 is a request from ITT home office for
10 more information to allow them to proceed with that
11 assessment.

12 MR. WALSH: Who is Ron Wiesinski (phonetic)?

13 MR. FINNERAN: He was in the home office.

14 MR. WALSH: So, this was from the home office
15 to us.

16 MR. FINNERAN: Attachment A3, correct.

17 MR. WALSH: Alright. This came from the home
18 office to the site. The home office, item 2, it is
19 saying to the site people define stability? I would
20 like to know how the Attachment A3 solved the problem?

21 MR. FINNERAN: We didn't say that attachment
22 A3 solved the problem?

23 MS. ELLIS: Was there an answer to Attachment
24 A3?

25 MR. FINNERAN: I don't recall.

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1 MR. IOTTI: John.

2 MR. FINNERAN: Yeah, Bob.

3 MR. IOTTI: My recollection is that eventually
4 TSE got so fed up with the inability of ITT to resolve
5 these issues, that...

6 MS. ELLIS: I'm sorry. I can't hear him at
7 all.

8 MR. FINNERAN: Well, all you have to do is to
9 go to our affidavit to see what occurred here.
10 Eventually, as we said in our affidavit, and I want to
11 find you the place.

12 Okay, it is on page 11 of the affidavit. We
13 say, the very last sentence on the page, when question
14 had not been resolved by ITT by September of 1982. He
15 directed that the support be modified to improve
16 stability.

17 MS. ELLIS: Okay. I think that what we would
18 like to have is any answer that was made, any backup
19 notes, any handwritten notes having anything to do with
20 this particular matter in answer to attachment A3, and
21 any subsequent information that went back and forth
22 regarding this matter.

23 MR. HORIN: Juanita.

24 MS. ELLIS: Yes.

25 MR. HORIN: How is that, I don't even know if

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1 there is any material that would fall into the scope of
2 that request. How is that material to the disposition
3 of this issue. We have already established in or
4 affidavit how it was ultimately resolved. We stated
5 that it had not been resolved.

6 MS. ELLIS: You are fading there at the last.
7 How what?

8 MR. HORIN: We stated in the affidavit that it
9 had not been resolved by September 1982. They usually
10 took it upon themselves to be directly resolved. I simply
11 don't see how additional documentation along those
12 lines that you are requesting is material to the
13 position of the issue. I think given the lateness of
14 the hour and this exercise, I think that one falls on
15 the side of matters that are not really important to
16 this issue.

17 MR. WALSH: I object to that one. The method
18 the applicants utilized in addressing this topic. It
19 would appear that they knew it in 1981, and didn't make
20 a modification until late of 1982.

21 MR. HORIN: Those are the facts, and we set
22 out the facts. Alright. We have given you the
23 communication that went back and forth, and we have
24 given you the matter in which was ultimately resolved.

25 MS. ELLIS: I think, Bill, if you look at

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1 material facts number four, that answers your question.
2 I think it totally ties in to that.

3 MR. HORIN: Read it to me. I don't have a copy
4 of it.

5 MS. ELLIS: Applicants promptly identified and
6 acted to correct potential instabilities of piping
7 supports at Comanche Peak over the course of the design
8 process.

9 MR. HORIN: We did promptly identify them, and
10 proceeded to resolve the issue.

11 MS. ELLIS: And acted to correct. We want to
12 know what you did, in fact, to correct it, including
13 the documents that we have asked for.

14 MR. HORIN: We have given you the complete
15 list of what we did.

16 MS. ELLIS: I think we made pretty clear the
17 documents that we would like to have.

18 MR. HORIN: I realize you made that clear, but
19 what I am saying is that we have provided the
20 information which sets out the steps that were taken in
21 this exercise. When it was initially identified, the
22 additional communication transpired how it was
23 ultimately resolved. I think the material facts that
24 have been presented and the documentation that has been
25 presented for material facts has been provided.

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1 MS. ELLIS: Okay. Are you saying that there
2 was no answer in writing to attachment A3 or any
3 subsequent information in writing either informally or
4 in the form of phone calls with, perhaps, documented
5 discussions, and so forth.

6 MR. HORIN: I am not aware of whether there
7 was or whether there was not. All I am saying is that
8 given the memorandum, the three memoranda which we have
9 provided to you, I believe John, what is A3 dated? Is
10 that in April of 1982?

11 MS. ELLIS: Yes. It is April 2, 1982.

12 MR. HORIN: Okay. As we stated, it was still
13 being kicked about with ITT and whether or not ITT was
14 doing something internally, we are not sure. But, when
15 it came to September of 1982, we decided that we were
16 going to take it upon ourselves to do something. I don't
17 see how it is material whether ITT is doing more
18 internally or not. There has not been a final
19 resolution as of September 1982. That is the material
20 fact.

21 MS. ELLIS: Okay. I think in this particular
22 instance, we will probably be following up with the
23 board on this. I think it is within the realm of what
24 should be provided. I think it is very relevant to item
25 4. I think you understand our position.

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1 MR. HORIN: I understand your position. I say
2 that you should sit back and look at it and step back a
3 step, and see what is really material.

4 MR. WALSH: Okay. Something you just said,
5 Bill.

6 We would like to see some documentation that
7 indicates two chiefs knew there was a problem. They
8 acted on it, prior to July of 1982.

9 MR. HORIN: John, correct me if I am wrong,
10 but I think we were just generally aware of the
11 question. I don't know if there is any separate
12 documentation on it.

13 MR. FINNERAN: That is correct.

14 MR. WALSH: How were you aware?

15 MR. HORIN: John.

16 MR. FINNERAN: How were we aware?

17 MR. WALSH: Yes.

18 MR. FINNERAN: As I said, there was verbal
19 communication concerning these box frames on the job
20 site, and the fact that there were these questions of
21 potential stability that just Aveley raise.

22 MR. WALSH: Was information that got the belly
23 raised, sent to Texas Utilities?

24 MR. FINNERAN: I don't think they got the copy
25 of Texas Utilities on this particular memo that he

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1 sent. But, he was in the field group at the time. He
2 certainly had discussions with other field engineers.
3 He obviously passed this information along to the
4 service engineers. All of those people have contact
5 with TUSI (phonetic)

6 MR. HORIN: Technical Services Engineers are
7 not organizations in specific, are they John?

8 MR. FINNERAN: I didn't hear that.

9 MR. HORIN: I said the Technical Services
10 Engineers are not specific to any one design
11 organization?

12 MR. FINNERAN: Well, they are representatives
13 of, at this time they were representatives of ITT and
14 NSSI in the technical services group.

15 MR. HORIN: But, they were all working
16 together.

17 MR. FINNERAN: That's correct.

18 MR. WALSH: So, there is no documentation. What
19 documentation does TUSI have to avoid a reoccurrence of
20 this problem from the field engineers.

21 MR. WADE: Again, we have never said it is a
22 problem.

23 MR. WALSH: So, you did not recognize it as a
24 potential problem, is that correct?

25 MR. FINNERAN: No. That is not correct. We

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1 obviously recognize it as a potential problem, and that
2 is why we wrote the memo.

3 MR. WALSH: Which memo is this?

4 MR. FINNERAN: Dr. Aveley's memo.

5 MR. WALSH: But, that is not TUSI. I said
6 TUSI, not ITT Grinnell.

7 MR. WADE: ITT is the one that is ultimately
8 responsible for the design, not Texas Utilities. This
9 is an oversight function. When we did identify or
10 understand what the issue was, we did take an action.
11 When we saw that the issue didn't get resolved in a
12 prompt manner, if we would have expected it took our
13 only week to get it resolved.

14 MR. WALSH: Yeah, but I believe Mr., I don't
15 believe...John just stated that it wasn't on that list
16 to see that letter. So, how would he know about this?

17 MR. WADE: Because it was discussed openly on
18 the site, and was well known by the people on the site.

19 MR. WALSH: So, it was a commonly known
20 problem that the supports were unstable?

21 MR. WADE: It was a commonly known problem
22 that the supports were unstable. We don't agree that
23 they are unstable. We agreed it was understood that the
24 issue had been raised and was being discussed, and that
25 action was being taken. We knew that action was being

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1 taken on the part of ITT Grinnell. So, we gave them
2 what we felt was an appropriate amount of time to
3 respond. When it was not resolved, we took our own
4 action to resolve it.

5 MR. WALSH: Is modifications that occurred
6 after the 1981 memo still ended up on the stable
7 supports.

8 MR. WADE: We don't agree with that.

9 MR. WALSH: Well, then there is no other
10 unstable supports created by the field engineers after
11 May of 1981?

12 MR. FINNERAN: We will take issue with your
13 characterization of them as unstable supports.

14 MR. WALSH: Yeah. Other than that, that letter
15 from Grinnell, or Gus Able from his home office, was it
16 correct, the unstable supports being generated by the
17 field?

18 MR. FINNERAN: His letter doesn't have
19 anything to do with what the field engineers might do.
20 His letter is saying that technical services the ITT
21 review engineers are not to approve any of these
22 supports until the issue gets involved. Those fellows
23 do not write the C&C's, the ITT engineers.

24 MR. WALSH: Mr. Able, or Abeley. Is he part of
25 Tech Services or field engineering?

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1 MR. FINNERAN: At this point and time he was a
2 member of field engineering. He was also the lead ITT
3 engineer on site. That is why he was the one writing the
4 memo back to the home office. So, he was representing
5 Tech Services in this regard...

6 MS. ELLIS: Has it now been lifted?

7 MR. FINNERAN: I think that we state that
8 since that he directed the supports, all of these
9 bi-frame supports, be modified to improve their
10 stability. If you want to assume that is a lifting of
11 the hold. The supports were approved by ITT, but only
12 after modifications to the facility then.

13 MR. WALSH: Alright. Just, I think, a couple
14 of more items here. I think John jsut stated that a
15 hold was put on for Tech Services to approve those type
16 of supports. What was done to stop the field engineers
17 from creating those type of supports?

18 MR. FINNERAN: That was by word of mouth by
19 Mr. Aveley, because he was a member of the field
20 engineers at that time.

21 MR. WALSH: And this word of mouth is the only
22 documentation that we have had?

23 MR. FINNERAN: That's correct.

24 MS. ELLIS: Just to be sure, there was no
25 NCR's? or IR's, no BMC, no DCA or anything like that

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1 written up, correct?

2 MR. FINNERAN: No.

3 MS. ELLIS: Thank you.

4 MR. HORIN: John.

5 MR. FINNERAN: Yeah.

6 MR. HORIN: Were any of this type of support
7 created by the field engineers following, you know, a
8 short period of time after the 1981 memo?

9 MR. FINNERAN: Bill, I don't know that. We
10 didn't look into that.

11 MR. WADE: John, weren't there some specific
12 C&C's issue that were issued with the specific intent
13 of improving this facility?

14 MS. ELLIS: I'm sorry, I can't hear you David.

15 MR. WADE: I said, wasn't there some C&C's
16 that were issued specifically, including that they were
17 being issued to improve the stability.

18 MR. FINNERAN: That's correct.

19 MR. WADE: Would that be in relationship to
20 this memo?

21 MR. FINNERAN: It could have been, David. It
22 could have been in reaction or relation to the verbal
23 discussion of these supports in the field at that time.

24 MR. WALSH: Could we have a copy of that C&C
25 then?

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1 MS. ELLIS: Or of all of them, if there is
2 more than one?

3 MR. FINNERAN: Which C&C?

4 MR. WALSH: The one that you just said that
5 may have been issued to improve its stability.

6 MR. HORIN: I think that has already been
7 provided months and months and months ago in the
8 hearing.

9 MR. WALSH: That would be the one that you are
10 referencing right now?

11 MR. HORIN: That is the one that I was
12 referring to and it was discussed in the hearings.

13 MS. ELLIS: Okay. Just the one, I understood
14 you to say that there was Sub C&C's. Was I wrong about
15 that?

16 MR. FINNERAN: I was just remembering myself,
17 the one that we talked about in the hearing.

18 MR. HORIN: Whatever is in the hearing record
19 is the only thing we are referring to. That is the only
20 thing that I have any knowledge of.

21 MS. ELLIS: Okay.

22 MR. WALSH: Alright, on page 4, item 8 of the
23 material fact. We would like to see the 15 supports as
24 they were and as they are now. We would like to see
25 the calculations that made them stable, I guess it is.

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1 MS. ELLIS: Okay. You want to see the drawings
2 and calculations as they were then and as they are now?

3 MR. WALSH: Yes, and one other item.

4 MS. ELLIS: Wait just a second. Let me write
5 that down.

6 MR. IOTTI: Which category is this?

7 MR. FINNERAN: You don't have a statement of
8 material facts?

9 MR. IOTTI: No.

10 MR. FINNERAN: This is when we talk about, let
11 me go back just a second.

12 MR. IOTTI: We are talking, basically, about a
13 main steam report.

14 MR. FINNERAN: We are talking about the main
15 steam support, and item number 8 in the material facts
16 refers to page 18 of the affidavit. Okay, we are
17 talking about 15 supports, 13 of which remain steam
18 supports. These were supports which in the original
19 design main steam supports had the eighth inch gap in
20 the design. I believe CASE already has some of these
21 drawings and has entered them into the hearing.

22 MR. WALSH: We want to make sure we are
23 talking about...

24 MR. FINNERAN: Most of the other drawings will
25 essentially be the same. They will show that there is

1 no value to the eighth in gap.

2 MR. WALSH: We want to make sure tat we are
3 talking about the same 15. I don't think we have ever
4 seen all 15 and correlated them.

5 MR. HORIN: I'm having trouble seeing why we
6 have to go into all 15 of them.

7 MS. ELLIS: I don't think that 15 is an
8 unreasonable number for this particular one. The
9 (inaudible) is one of the important things that, I
10 think we are interested in.

11 MR. FINNERAN: I don't see what this is going
12 to show you beyond what you already have. We have some
13 drawings which show an eighth inch gap between the
14 U-bolt mechanism, the U-bolt plant mechanism and the
15 pipe. What is a drawing showing the same thing going to
16 give you?

17 MS. ELLIS: The problem is that we don't have
18 them identified in the affidavit or in the material
19 facts. If you could tell us which ones they are and
20 point them to us, that would be fine if we got them. If
21 we don't have them, we would like to have it.

22 MR. WADE: John. I think on page 15 of the
23 affidavit we talk about these potentially unstable
24 supports. We talk about U-bolting strutts and solid
25 gap. For example, we say it is exhibit 669B4Q. So, all

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1 of them will essentially look like this. They will have
2 an eighth inch gap in them.

3 MR. WALSH: Well, John, I think it would be
4 just best if you were to give us the 15 support
5 drawings and the calculations before and after, so that
6 when we run across it, we won't say, well, this is a
7 support that was not noticed already or something like
8 that. For example, during the CYGNA hearings, we found
9 another unstable support that was modified. We don't
10 know if that was part of 15. So, if we were to give you
11 those (inaudible), if we should add to it, or if...

12 MR. HORIN: Mark. We have already identified
13 the type of support. We can just give a list.

14 MR. FINNERAN: Yeah. I will give you a list of
15 the main steam supports. That will allow you to
16 identify them.

17 MR. WALSH: Well, we would also like to see
18 which organization originally designed them, and which
19 organization is responsible for the final design, ECD.

20 MR. FINNERAN: The main steam supports, ITT
21 was responsible for all the designs.

22 MR. WALSH: And, the other ones?

23 MR. FINNERAN: Which other ones?

24 MR. WALSH: Well, there is 15, and there is
25 only 13 main steam supports.

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1 MR. FINNERAN: I think the other two are ITT
2 also. I can confirm that.

3 MR. WALSH: Alright. So, one of them is the
4 residual heat system.

5 MR. WADE: That was definitely ITT.

6 MR. WALSH: I don't know what the other one
7 was.

8 MR. WADE: We can discuss that against a list
9 of all (inaudible).

10 MR. WALSH: Alright. If you provide us with
11 the numbers, and who was doing the other two while a
12 list of the organizations that would be sufficient.

13 MS. ELLIS: Okay. We may want to ask, are you
14 going to answer some more, maybe some of the
15 calculations when we see them, Mark? Are you going to
16 want those later?

17 MR. WALSH: Yeah. I would like to see the
18 final, the before and after drawings.

19 MR. FINNERAN: The other container, ITT also
20 designed.

21 MR. WALSH: Okay.

22 MS. ELLIS: So, all of them are ITT?

23 MR. FINNERAN: That's correct.

24 MR. WALSH: We would like to see the original
25 drawing that was issued, the drawing that was made

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1 stable, and the drawing as it is to let it, that it was
2 made stable by.

3 MR. HORIN: Aren't these all the same
4 condition, John?

5 MR. FINNERAN: Couldn't hear you Bill.

6 MR. HORIN: Aren't these all under the same
7 condition. All the drawings simply show the same thing.

8 MR. FINNERAN: It is the same condition every
9 time.

10 MR. WALSH: So, they were originally designed
11 that way, on every one of them?

12 MR. FINNERAN: On the two, off the main steam,
13 let me check that, just a second.

14 Okay, on the two non mainsteam supports, I
15 don't believe the additional designs show a gap, but
16 they were modified in the field. The field
17 modifications that were made actually wound up with a
18 gap and this was identified and corrected.

19 MR. WALSH: When was this identified?...in the
20 drawing. We would like the specifics.

21 MR. FINNERAN: I don't know when they were
22 identified, as we stated in our affidavit on page 18,
23 the two non mainsteam supports were modified in October
24 and December of 1982 to address the gap.

25 MR. WALSH: Well, we would like to see when

1 this thing became unstable. When the steel modification
2 came about.

3 MR. FINNERAN: When the modification was made
4 that had a gap in the U-bolt?

5 MR. WALSH: And the calculations to back the
6 support up.

7 MR. HORIN: Mark, on the calculations that is
8 a separate question. I think that when we are talking
9 about stability, we are not talking about separate
10 calculations that relate to stable or unstable
11 conditions itself. You are not going to have separate
12 calcs to determine what is stable or unstable. That is
13 something that the designer simply looks at the loads
14 and assesses whether or not the support is stable in
15 those directions. It is not some calculation that he
16 does to see if it is unstable.

17 MR. WALSH: Okay. Well, we would like to see
18 the field modification, the date of it, and the
19 calculation if he did calculate for it.

20 MR. HORIN: Can we get the date of when the
21 modification might have been?

22 MR. WALSH: We would like to see the drawings
23 and the support numbers, you know, like in a little
24 package. Yes, all 15 of these. This would be a lot
25 easier, instead of doing one at a time.

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1 MS. ELLIS: I think the problem Bill, that I
2 have got with not getting a list and getting them and
3 coming back and saying that we want this one and this
4 one. It is going to be lengthy.

5 MR. HORIN: But Juanita, what I was saying was
6 not that there was going to be any delay. I was just
7 saying that for the purpose that Mark said he wanted
8 these for, there was no need to provide drawings.

9 MR. WALSH: Yes. I believe it is very
10 important for the drawings. That is one of the most
11 important parts.

12 MR. FINNERAN: How does it relate to the
13 material facts? We don't see that.

14 MR. WALSH: Well, first I can see if the thing
15 is stable or not. Then, I can look at it and I can
16 determine if the thing is now stable, or is it
17 unstable. I haven't seen this stuff. Maybe the thing is
18 still unstable. It went by before by a lot of people's
19 desks, and the thing went out and was constructed and
20 it was unstable. I don't know if it is stable or not.

21 MS. ELLIS: I think this all goes back to item
22 8 on page 4. I think that it is very clear, the wording
23 there.

24 MR. HORIN: What does item 8 say?

25 MS. ELLIS: Item 8 states, applicants

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1 identified 15 of these types of supports in Unit 1 and
 2 common areas. Thirteen of these supports are main steam
 3 supports. Three of the main steam supports were
 4 actually modified for the initial installation in such
 5 a way that initial instability was removed. These
 6 modifications occurred prior to September, 1982. The
 7 remaining 10 mainsteam supporters were modified between
 8 January 1983, and June 1983. The two non-maintenance
 9 steam supports were modified in October and December
 10 1982. The modifications consisted of cutting the
 11 U-bolts or adding supplementary structural steel that
 12 would prevent the rotation of the U-bolt clamp
 13 offender. It refers back to the affidavit on page 8.

14 MR. FINNERAN: Okay. All you are going to see
 15 here is that the majority of those drawings that the
 16 U-bolts have been snugged out.

17 MR. WALSH: Alright. Well, we would like to
 18 see that.

19 MS. ELLIS: Okay. Can we take a break for just
 20 a moment.,

21 MR. WALSH: Yeah. Fine with me.

22 MS. ELLIS: I want to talk about this for a
 23 second. Maybe we can cut it down some.

24 MR. BURWELL: Off the record.

25 (Off the record discussion.)

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1 MR. FINNERAN: We can't see the connection
2 between the material facts and what CASE has asked for
3 here. So, we don't see the need for them to have these
4 drawings. We have shown you exactly what we have got,
5 and the drawings will show you that we have done that.

6 MR. WALSH: We would like to see what the
7 applicants identify, because that is stated right there
8 in the beginning.

9 MR. FINNERAN: Yeah. You already have a
10 drawing that shows that in your own case exhibits.

11 MR. WALSH: We want to see all of them that
12 the applicants identified, not what CASE identified.

13 MS. ELLIS: CASE isn't asking for an operating
14 licence.

15 MR. WALSH: But, it states applicants
16 identified, not CASE. We want to see the 15 that the
17 applicants identified.

18 MR. HORIN: Do you just want those drawings?

19 MS. ELLIS: Okay. I think what we would like
20 to have is a listing of all 15. We want the two that
21 were not mainsteam supports. We want the complete
22 packages on those, the parts. When I say complete
23 packages, what we want is...run through that once
24 again, Mark.

25 MR. WALSH: The original drawing as it was

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1 issued, revision zero. We want the drawing that was
2 made, that was made unstable, that shows a support
3 being potentially unstable.

4 MR. FINNERAN: Well, maybe that is the
5 original drawing, Mark.

6 MR. WALSH: Well, if that is the case, that is
7 what we want to see. And, the third item is the drawing
8 that made it stable.

9 MR. FINNERAN: Okay.

10 MS. ELLIS: And any calculations to go with
11 that.

12 MR. WALSH: And any C&C's on those supports
13 that were issued by the field that when the field
14 engineer generated the C&C, he made it not stable, if
15 that exists.

16 MR. WADE: Are you talking about the two non
17 mainsteam?

18 MR. WALSH: Whatever supports. We don't know.
19 We haven't seen them. As soon as we see the drawings,
20 we can tell you.

21 MS. ELLIS: Okay. So far we have asked for a
22 list. We have asked for packages on the two that are
23 not main steam point. Okay, from the list, we want to
24 come back and ask for, say three, packages on the
25 mainsteam support.

1 MR. WADE: When you are saying packages, are
2 you saying the same thing that you mean by packages
3 with respect to two.

4 MS. ELLIS: Right.

5 MR. WALSH: The packages would be the original
6 design or the original drawings, the drawing that made
7 it unstable, and then the drawing that made it stable.

8 MR. WADE: Mark, I think you may be
9 oversimplifying what you are looking for. There were
10 design changes in that system, just as the normal
11 design progressed, which there may be no comparison to
12 the original supports and the support that was out
13 there now for many other reasons other than the one
14 that you are pursuing.

15 MR. WALSH: Okay. But, if any of those design
16 changes created an unstable condition, we would like to
17 now those also.

18 MS. ELLIS: We are trying not to ask for the
19 whole package for the whole thing, okay.

20 MR. WADE: That is what you are asking for,
21 though. What you are going to get is a ton of paperwork
22 that you are not going to know what to do with.

23 MR. HORIN: David. I think what he means by
24 packages is simply the drawings, the red zero
25 drawing with the gap. Then, in the instances where

1 there were no field modifications that created the
2 potential instability, the drawings in which the change
3 was made to eliminate instabilities.

4 MR. WADE: Now, I hear that Bill, but it is
5 not that simple, I think. Because, progression of the
6 design on that system, in some cases, we may have found
7 a way to optimize design and completely changed the
8 functions of all the supports. The original designs
9 will bear no resemblance to the design that is there
10 now, or even this question.

11 MR. HORIN: I think we know that that is the
12 case in at least two incidents that we have seen.

13 MR. FINNERAN: Yeah. We have said that.

14 MR. WALSH: We're looking for a history. That
15 is what most we have made...

16 MR. WADE: But, the subject is stability, not
17 the entire history of this line and its designed
18 progression.

19 MS. ELLIS: That is why we asked him for
20 everything.

21 MR. WADE: You did ask for red zero and
22 everything in between, so, you are asking for
23 everything.

24 MR. WALSH: No. We are asking for red zero,
25 and a revision to the drawing that made it unstable.

1 MS. ELLIS: Not if there were 15 others in
2 between. We don't want those.

3 MR. WADE: That is what I am saying. You are
4 comparing apples and oranges. The original drawing that
5 may have existed on that line years and years ago, may
6 not even be of any similar configuration which you
7 could have made unstable.

8 MR. WALSH: We are interested in the one that
9 was issued to the field.

10 MR. WADE: You don't understand what I am
11 saying, do you?

12 MR. WALSH: Before the field engineers get
13 ahold of it.

14 MR. WADE: You don't understand what I am
15 saying, you are not listening.

16 MS. ELLIS: Wait a minute. I think I
17 understand what you are saying. Okay, rather than
18 necessarily asking for the original drawing, maybe we
19 should ask for the drawing that made it potentially
20 unstable, and the drawing immediately preceding that.

21 MR. WADE: There you are getting closer.

22 MS. ELLIS: Is that more what you are talking
23 about?

24 MR. WADE: Yeah. What I am saying is they may
25 have done a completely different design configuration

1 than existed years ago. Because of optimization or
 2 changes to the system, it may have occurred, we may
 3 have completely changed the design of that supporting
 4 system. So, there is no resemblance at all. Therefore,
 5 the original design that was put out there might never
 6 have been unstable or could have been unstable.

7 What you are concerned with is the support
 8 which may have proceeded back up the way maybe two or
 9 three revisions.

10 MS. ELLIS: Right.

11 MR. WADE: But, not the original. You go back
 12 to the original, and you are going to get a pile of
 13 paperwork you won't know what to do with.

14 MS. ELLIS: Okay. We don't want all the stuff
 15 in between, but I see what you are saying, I think. So,
 16 what we want, what we basically want is the history.

17 MR. FINNERAN: I think you want the history of
 18 the unstable aspects, the history of what exists there
 19 today. I think it was prior to that time.

20 MS. ELLIS: Right. What it looked like right
 21 before it was made potentially unstable.

22 MR. WADE: I understand what you are looking
 23 for.

24 MS. ELLIS: Right. And then, up through now.

25 MR. WADE: We understand, but don't ask for

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1 rev. zero, because you are going to get more than you
2 want. Let us determine, we know what you are looking
3 for, let us supply that information.

4 MR. FINNERAN: In probably 13 of these
5 supports, he is going to get reg. zero.

6 MR. WALSH: Well, that is what I was under the
7 impression. So, that is why I said, Reg. zero.

8 MR. WADE: I know the history that has been
9 main steam and of the design progressions. I am
10 concerned that there could be somewhere that you would
11 not get Reg zero's.

12 MS. ELLIS: Okay. As long as we understand
13 where we are coming from and what we are really after.

14 MR. WADE: That is the key, that we understand
15 what the contest is.

16 MR. HORIN: You said that you wanted a list of
17 the 15 and then a sample of the three of the packages.
18 You said that you would ask for that later.

19 MS. ELLIS: Right.

20 MR. HORIN: We will just go ahead and do that
21 sample right now and save time.

22 MS. ELLIS: Well. We would like to take the
23 sample. You can go ahead, if you want to, it may be
24 alright, but there may be some particular support in
25 there that either we have a drawing of, whether we have

1 something like that we may want to pursue.

2 MR. HORIN: So. Maybe we will just give you
3 the list so we don't duplicate the effort.

4 MR. FINNERAN: We could go ahead and pick
5 three of those that you don't already have. We know the
6 ones in the Dall exhibit.

7 MS. ELLIS: I think you know, pretty well, the
8 ones that we have.

9 MR. FINNERAN: Yeah. You want three that you
10 don't have.

11 MS. ELLIS: Is that basically it, Mark?

12 MR. WALSH: Either way, I don't care.

13 MR. FINNERAN: We'll do that.

14 MS. ELLIS: Okay. That's the main thing. In
15 the two that are not maintained, we will not bother
16 with that one.

17 MR. FINNERAN: Okay.

18 MS. ELLIS: One more thing. If there are any
19 calculations, we would like to have them too, that are
20 applicable to what we are talking about. If there is
21 not, well, fine.

22 MR. WALSH: Alright. The last thing is on page
23 27 of the affidavit, discussing a portion of the main
24 steam piping. We would like to see the drawings of the
25 supports that were involved with this pipe run.

1 MR. HORIN: What do you mean by involved?

2 MR. WALSH: Pardon?

3 MR. HORIN: What do you mean by involved?

4 MR. WALSH: Well, they analyze 50 feet of
5 pipe. I would like to see all the supports that are
6 involved to this pipe run, that are attached to to
7 pipe.

8 MR. FINNERAN: You want a copy of the drawing?

9 MR. WALSH: Yes.

10 MR. FINNERAN: That's not problem.

11 MR. IOTTI: Excuse me, this is Bob Iotti.
12 Mark, do you understand that for the purpose of this
13 analysis, all of those supports were assumed to not be
14 acting?

15 MR. WALSH: Yes. I would like to see those
16 supports. Could you also get me the piping isometric
17 that went along with it so I can identify where they
18 are located?

19 MR. HORIN: Would it be one iso, John?

20 MR. IOTTI: No. I think it is two.

21 MR. FINNERAN: We can provide that.

22 MR. WALSH: Alright. That is all.

23 MS. ELLIS: Okay.

24 MR. HORIN: Juanita, you said you were going
25 to send something on design QA?

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1 MS. ELLIS: What?

2 MR. HORIN: You said you would be sending
3 something on design QA?

4 MS. ELLIS: Right. Just as I suspected, this
5 went a little over 2 hours, and I certainly didn't want
6 everybody, all the technical people to have to go
7 through that.

8 MR. WADE: Bill, I have noted here several
9 items which we have now agreed to provide, and I think
10 it would be nice so that there are no misunderstandings
11 that we go over those briefly and make sure everybody
12 agrees what those seven items are. If my count is
13 wrong, then let's correct it.

14 MS. ELLIS: Okay.

15 MR. HORIN: Would you all like for me to
16 start?

17 MS. ELLIS: Yeah. Why don't you go ahead.

18 MR. HORIN: The first item had to do with
19 ascension of U-bolts. We agreed that we would provide
20 you the pertinent parts of an ASTE document that is
21 referenced in the affidavit.

22 MS. ELLIS: Right.

23 MR. HORIN: The second item, dealt with the
24 axial restraint. It was documentation on the procedure
25 that we used for modeling trunyon for Gibbs and Hill

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1 and Westinghouse.

2 MS. ELLIS: Right.

3 MR. HORIN: The third thing I have was a
4 drawing or something that demonstrated the largest
5 difference when we were considering rotation, also the
6 calculations to back that up.

7 MS. ELLIS: Right. We have already prepared
8 them with that.

9 MR. HORIN: Okay. Is that agreed?

10 MS. ELLIS: Yes.

11 MR. HORIN: Okay. The next item was
12 calculations supporting a particular support
13 CT101323S42K, and the drawings showing that trunon
14 effects were taken into account. I think on that one we
15 clarified that the loads would not be on the drawings.

16 MR. WALSH: Right.

17 MR. HORIN: The next item has to do with
18 Richmond inserts. It was documentation that showed
19 where we instructed engineering to verify the adequacy
20 of threaded rods.

21 MR. WALSH: In the original design.

22 MR. HORIN: The original design counts by all
23 organizations, Gibbs and Hill, ETT, NPSI, all prior to
24 1982. You wanted to include support MS1-02003C72S, and
25 also from exhibit 669 9Q, which was the moment

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1 restraint at Gibbs and Hill.

2 MS. ELLIS: I think he said 9-R also. It is
3 part of the same thing.

4 MR. HORIN: And then, I believe you requested
5 teh original of the 15 supports which we are going to
6 provide you three in the main steam system, and you
7 wanted both the samples that were not in the main steam
8 system on unstable pipe supporting.

9 MS. ELLIS: Okay.

10 MR. HORIN: Then, the last item, the one we
11 just discussed, which was on the drawing of the main
12 steam analysis and the stress isopes. That is
13 everything that I show that we agreed to provide.

14 MS. ELLIS: Right. I guess we will be going to
15 the board, Bill with the one that we discussed earlier
16 under item 4 under stability.

17 MR. HORIN: That was the additional
18 documenation with NITT regarding the box frame
19 stability support subsequent to 1982.

20 MS. ELLIS: I can't hear you too well, but I
21 think you are saying the same thing. This is attachment
22 A3.

23 MR. HORIN: Right. Documentation subsequent to
24 that, IITT.

25 MS. ELLIS: Well, by anyone who had anything

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1 to do with it. If SUZI had anything back and forth with
2 ITT or anybody that had anything to do with it.

3 MR. HORIN: Okay.

4 MS. ELLIS: I'm sorry, I can't hear you.

5 MR. HORIN: Ask Mark to read over the material
6 facts if he really thinks that is material.

7 MS. ELLIS: I think we agree very definitely
8 that we do.

9 MR. WALSH: Yeah.

10 MR. HORIN: Okay, so we all stand.

11 MS. ELLIS: We disagree, right?

12 MR. HORIN: Yes. Well, alright, I am gone. I
13 will catch you all later.

14 MS. ELLIS: I guess that is it.

15 MR. BURWELL: Okay, if that is it, anyone
16 else. Does that complete it?

17 MS. ELLIS: It will probably take me, I have
18 got some other stuff that I am committed to do
19 tomorrow. Hopefully by either tomorrow night or
20 Wednesday, I will be able to get something off on this
21 QA for design.

22 MR. BURWELL: Okay, very fine. With that,
23 then, the meeting is closed, and the record is closed.

24 (Meeting closed at 10:50 p.m.)
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