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RELATED CORRESPONDENCE

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USNRC

July 21, 1988

UNITED STATES NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
)
Public Service Company of)
New Hampshire, et al.)
)
(Seabrook Station, Units 1 & 2))
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)
)
)
)

Docket No. 50-443 OL-1/444-
OL-1
ONSITE EMERGENCY
PLANNING & TECHNICAL
ISSUES

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S
THIRD SET OF INTERROGATORIES AND REQUEST FOR
THE PRODUCTION OF DOCUMENTS TO APPLICANTS
ON NECNP CONTENTION I.B.2

INSTRUCTIONS FOR USE

The following interrogatories are to be answered in writing and under oath by an employee, representative or agent of the Applicants with personal knowledge of the facts or information requested in each interrogatory. We remind you of your obligation to supplement answers to interrogatories, under 10 C.F.R. § 2.740(e).

The following definitions shall apply to these interrogatories:

- 1) "Document" shall mean any written or graphic matter or communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other means, computer data, computer printouts, photographs, microfilm,

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microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

2) "Identify" with respect to any document shall mean to state the following: the document's title, its date, the author of the document, the person to whom the document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3) "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or proposed effect of such action; and any document recording or documenting such action.

4) "Identify" with respect to an individual shall mean state the individual's name, address, employer, occupation, and title.

5) "NECNP's first set of interrogatories" refers to interrogatories posed in "New England Coalition on Nuclear Pollution's First Set of Interrogatories and Request for the Production of Documents," filed June 28, 1988.

INTERROGATORIES

1) For each of the four individual identified in response to interrogatory No. 1 of NECNP's first set of interrogatories, please describe the person's area of expertise and the particular substantive contribution that the person has made, both to the Applicants' review of the RG-58 coaxial cable issue, and to the answering of NECNP's first, second, and third sets of interrogatories.

2) Please identify all witnesses and affiants you intend to use in hearings and summary disposition proceedings on RG-58 coaxial cable, and describe the substance of their affidavits and testimony.

3) On May 27, 1988, you filed a revised "Suggestion of Mootness" which corrected your May 19, 1988, tabulation regarding the categorization of RG-58 cables in the Seabrook plant. How and when was this error discovered? To what do you attribute the error made in the May 19th filing? Was the review procedure described in the May 19th Bergeron affidavit inadequate to detect this error? If so, how? Was the review procedure described in the Bergeron affidavit improperly carried out? If so, how?

4) Does the June 16 Bergeron affidavit describe any review procedures for the identification and location of RG-58 cable that are not already described in the May 19 Bergeron affidavit? If so, please describe them, and explain why they were added.

5) In response to interrogatory 5 of NECNP's first set of interrogatories, you state that "subsequent review" has

determined that cables No. FE2-FM4/2 and FE2-FM6/2 were spare cables. Please describe this "review" and state when it took place and by whom it was conducted. In what respects, if any, does it differ from the review described in the Bergeron affidavits of May 19 and June 16, 1983? Do you consider the procedures described in those affidavits to be inadequate in any way? If so, how? Please describe your reasons for conducting the "subsequent review."

6) Do the electrical schematic drawings that you reviewed according to the procedures described in the Bergeron affidavits show that cables No. FE2-FM4/2 and FE2-FM6/2 are spare cables? If not, please describe the reason for the error and any efforts you have made to detect other errors in the electrical schematic drawings.

7) Does the CASP show that cables No. FE2-FM4/2 and FE2-FM6/2 are spare cables? If not, please describe the reason for the error and any efforts you have made to detect other errors in the CASP.

8) Given the fact that you previously erred in calculating that some cables were energized when they were actually spare cables, do you believe it is possible that some cables which you believe are spare are actually energized? If not, why not?

9) Have you physically inspected all spare RG-58 coaxial cables to determine whether they are indeed not connected to any circuits? If so, when was the inspection performed and what were the results? If not, why not?

10) Please describe the steps taken to account for the 502 feet of RG-58 cable that have not yet been accounted for. What are the results of your review to date? To what do you attribute your previous inability to account for this cable? Are you confident that none of this cable must be environmentally qualified? If so, why? If not, why not?

11) In response to interrogatory No. 7 of NECNP's first set of interrogatories, you state that 4,000 of the 12,000 pages of electrical schematic drawings contain cable schematics and cable tables. Did you review only those 4,000 pages, or did you also review the other 8,000 pages? What information did the 8,000 pages contain? If you did not review them, why not?

12) In response to interrogatory No. 12 of NECNP's first set of interrogatories, you state that Applicants physically verified the locations of the end points of each of the 12 replaced RG-58 cable, as part of the process of disconnecting and replacing those cables. Have Applicants physically traced the route of those cables over their entire lengths? If so, how and when was this done? Did the physical review confirm your review of CASP and the plant drawings? Please identify all cables for which your physical review did not confirm what was in CASP and the drawings, describe the discrepancy, and state why you believe the discrepancy exists.

13) Have Applicants physically verified the endpoints of any other of the 126 RG-58 coaxial cables? If so, which ones

have you verified? How and when was this done? Did the physical review confirm your review of CASP and the plant drawings? Please identify all cables for which your physical review did not confirm what was in CASP and the drawings, describe the discrepancy, and state why you believe the discrepancy exists.

14) Have you physically traced the routes of any of the remaining RG-58 coaxial cables over their entire lengths? If so, which ones were traced? Did the physical review confirm your review of CASP and the plant drawings? Please identify all cables for which your physical review did not confirm what was in CASP and the drawings, describe the discrepancy, and state why you believe the discrepancy exists.

15) Please explain how procedure FEP-504 provided physical verification of the location of each RG-58 coaxial cable. Would that procedure also verify whether cables were energized or not? If so, why did it not show that some of the cables shown to be energized by CASP and/or plant drawings were not in fact energized?

16) What is the source of and basis for the acceptance criteria described in Section 5.2 of Procedure No. 2483-89N, Attachment 1 to NYN-8905?

17) Your response to interrogatory 18 of NECNP's first set of interrogatories appears to indicate that it is your position that the 12 circuits in which RG-59 coaxial cable is used will function properly regardless of how low the insulation resistance

drops as long as the cable does not short to ground. Is that correct? If so, please explain your answer. If not, please explain why not. Is it your position that the circuits would continue to function during a direct short? If so, please explain your answer. If not, please explain why not.

18) On what basis have you concluded that the functional performance of RG-59 coaxial cable in each of the 12 circuits makes it a technically acceptable substitute for RG-58 coaxial cable?

19) Is it correct to state that you do not know the minimum insulation resistance necessary for the proper functioning of each circuit where RG-59 coaxial cable has been substituted for RG-58 coaxial cable? Please explain the reason for your answer.

20) In response to NECNP's interrogatory No. 19, you state that "cable manufacturer data was reviewed and determined to be acceptable" for each substitute application of RG-59 coaxial cable. Precisely what information in the RG-58 or RG-59 coaxial cable manufacturer data led you to believe that RG-59 cable was an acceptable substitute for RG-58 cable? Please explain why you considered the data to be sufficient.

21) Is it correct to state that there is no minimum insulation resistance required for the successful functioning of the circuits in which RG-59 coaxial cable have been substituted for RG-58 coaxial cable? Please explain your answer.

22) Do you agree that degradation of signal due to insertion loss (attenuation) and variation in response time due to the

change in the velocity of propagation are pertinent parameters for proper function of the 12 substitute RG-59 coaxial cables?

23) Is it your position that decreases in the insulation resistance of the 12 substitute RG-59 coaxial cables would have no effect on the degradation of signal due to insertion loss (attenuation) and variation in response time due to the change in the velocity of propagation?

24) Do you agree that the length of cable exposed to the accident environment is relevant to a determination of its insulation resistance? If not, why not?

25) For each of the 12 cables exposed to a harsh environment, is it possible to measure the length of cable that is exposed to the harsh environment? If so, why have you not done so? If not, why not?

REQUEST FOR THE IDENTIFICATION AND PRODUCTION OF DOCUMENTS

1) Please identify all documents relied on for purposes of answering the foregoing interrogatories or identified in response to the foregoing interrogatories.

2) Within 14 days, please provide access to all documents identified in response to the immediately preceding request, No. 1.

3) Please provide access to procedure FEP-504.

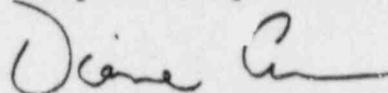
4) Please identify and provide access to all documentation of the manner in which procedure FEP-504 provided verification of the location of RG-58 coaxial cable.

5) Please provide access to the data sheets described in Attachment 2 to your answers to NECNP's first set of interrogatories, the July 5, 1988, letter from NTS to R. Bergeron/J. Vargas.

6) Unless already provided in response to the preceding document request, please provide access to all other results of equipment qualification testing of RG-58 coaxial cable, including insulation resistance measurements.

7) Please provide access to the cable manufacturing data referred to in your answer to interrogatory 19 of NECNP's first set of interrogatories.

Respectfully submitted,



Diane Curran
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July 21, 1988

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UNITED STATES NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 25 A11:41

In the Matter of)	
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Public Service Company of)	
New Hampshire, et al.)	
)	Docket Nos. 50-443 OL-1
(Seabrook Station, Units 1 & 2))	50-444 OL-1
)	ONSITE EMERGENCY
)	PLANNING & TECHNICAL
)	ISSUES

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

NOTICE OF DEPOSITIONS

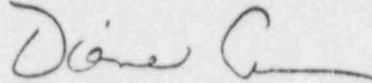
The New England Coalition on Nuclear Pollution hereby notifies Applicants that it intends to take the depositions upon oral examination of Joe M. Vargas, Richard Bergeron, Gerald A. Kotkowski, Peter Tutinas, any other individual(s) whose affidavit(s) Applicants intend to file in summary disposition pleadings regarding RG-58 coaxial cable, and any other individual(s) whose testimony Applicants intend to present in adjudicatory hearings regarding RG-58 coaxial cable. The depositions will take place at the offices of Ropes & Gray, 225 Franklin Street, Boston, Massachusetts, on August 12, 1988, at the following times, or at such other date and time as the parties may mutually agree:

<u>Deponent</u>	<u>Time</u>
Richard Bergeron	9:00 a.m.
Gerald A. Kotkowski	11:00 a.m.
Peter Tutinas	1:30 p.m.
Joe M. Vargas	3:30 p.m.

The deponents will be examined regarding the basis for Applicants' position on the need for and adequacy of environmental qualification of RG-58 coaxial cable and substitute cable,

and the adequacy of RG-59 cable as a substitute for RG-58 cable. NECNP reserves the right, upon reasonable notice to Applicants, to amend this notice of deposition in order to add or delete deponents and to request the production of documents.

Respectfully submitted,



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July 21, 1988

~~RELATED CORRESPONDENCE~~

DOCUMENT
15-NFC

CERTIFICATE OF SERVICE

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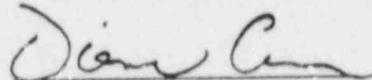
I certify that on July 21, 1988, copies of the following documents were served by overnight mail or first class mail, on the individuals listed on the attached service list:

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S
BRIEF IN OPPOSITION TO AUTHORIZATION OF
LOW POWER OPERATION AT SEABROOK NUCLEAR POWER PLANT

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S
THIRD SET OF INTERROGATORIES AND REQUEST FOR
THE PRODUCTION OF DOCUMENTS TO APPLICANTS
ON NECNP CONTENTION I.B.2

NOTICE OF DEPOSITIONS

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S
MOTION FOR EXTENSION OF DISCOVERY SCHEDULE


Diane Curran

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** Overnight Delivery

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