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RELATED CORRESPONDENCE

June 28, 1988

DOCKETED
USNRC

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

'88 JUL -1 P5:05

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket No. 50-443 OL-1/444-061

ONSITE EMERGENCY
PLANNING & TECHNICAL
ISSUES

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S
FIRST 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.

INTERROGATORIES

1) For each separate interrogatory below, identify each person who participated in any way in the development or prepara-

tion of answers thereto, and describe the information or ideas contributed by that person.

2) What is your position with respect to NECNP Contention I.B.2?

3) Please identify all individuals whom you intend to call as witnesses to support your position during the proceedings regarding Contention I.B.2, and describe the substance of their testimony.

4) Please identify all individuals whose affidavits you intend to submit in summary disposition proceedings regarding Contention I.B.2, and describe the substance of their affidavits.

5) Do you continue to assert the facts and opinions expressed in the affidavits you have filed before the Licensing and Appeal Board following the issuance of ALAB-891? If any of these facts and opinions have changed, please identify them and describe the reasons for the changes.

6) Identify all individuals on whose knowledge or opinions you relied in each of the filings before the Licensing Board and Appeal Board since the issuance of ALAB-891. For each of those individuals, describe that portion of the filing for which you relied on that individual.

7) Please describe how the "electrical schematic drawing package review" described in paragraphs 6 through 8 of the Bergeron Affidavit was conducted. Did this review include examination of all 124 packages of 12,000 drawings? If so, please

identify the individuals who participated in the review of the drawings, describe how long the review took, and on what dates it took place. If not, please describe the procedure by which you determined which of the 12,000 drawings should be reviewed, and identify the drawings that were reviewed.

8) How many cable raceway drawings exist for the Seabrook plant?

9) In determining the route of each RG-58 cable, did you review all cable raceway drawings? If not, how many and which drawings did you review? By what criteria did you select those drawings?

10) Are you able to account for all 60,000 feet of RG-58 cable purchased under P.O. 9763-006-113-19-01? If so, how is this accounting done, and what is the source of the data?

11) If your answer to the preceding interrogatory is yes, please describe the length of each used, unused, and spare cable.

12) Have Applicants performed any physical inspection of the Seabrook plant to determine the actual location of each RG-58 cable? If so, when was this done? What were the results?

13) Have Applicants performed any physical inspection of the Seabrook plant in order to verify the information yielded by the CASP data base regarding the location of each RG-58 cable? If so, when was this done? What were the results?

14) Is the CASP data based derived from electrical schematic drawings? If so, please describe the manner in which it is derived.

15) Is there a common source of input to the electrical schematic drawings and the CASP data base? If so, what is it?

16) To your knowledge, has RG-58 coaxial cable ever been submitted to environmental qualification or other performance testing? If so, please describe the date, parameters, and results of each such test.

17) In deciding whether a cable is environmentally qualified, do you agree that you must take into consideration the functional performance requirements of that cable in its particular functional application? For example, do you agree that the magnitude of leakage current permissible for a cable used in a power circuit could be significantly larger than the leakage current permissible for a cable used in an instrumentation circuit?

18) Did you evaluate the functional performance of RG-59 cable when exposed to the harsh environment in the twelve circuits where it will be used to replace the RG-58 cable? If so, what were the results of your evaluation? If not, why not?

19) What are the lengths of the twelve cables that you intend to replace w/ RG-59? How much of each cable length could be exposed to the harsh environment? What are the specifications for the minimum insulation resistance necessary for proper functioning of each circuit?

20) For each of the 126 RG-58 cables that you have identified, you have provided broad information regarding the function of that cable. See Attachment D to the Bergeron

Affidavit. However, these functions are not described in sufficient detail to allow an independent judgment as to whether they are safety or non-safety related. Please provide all additional information that is necessary for the evaluation of the specific functions served by the RG-58 cable, including what specific information is carried by each circuit. For example, please describe whether the cable carries instructions to a printer, instrument readings (including the specific instrument whose measurements are being conveyed, and the parameters that are reported), or other signals, and the significance of those signals. Please describe the source and the destination of the signals.

21) For each RG-58 cable, what was the source material for the determination that functions were nonsafety related? Please provide access to that material.

22) Was any attempt made to determine whether P.O. 9763-006-113-19-01 is the only purchase order that included RG-58 coaxial cable? If so, please describe what was done.

23) What measures, if any, do you intend to implement to ensure that at no time during plant life will the spare RG-58 cables inadvertently become energized, for example, by technician error or equipment malfunction? Please provide documentation of any measures you describe.

24) What is your basis for claiming that the ten cables outside the nuclear island are routed only with non-safety cables?

25) What, if any, review was done of the plant emergency procedures to determine whether all the emergency procedures can be carried out as instructed, assuming the failure of all RG-58 cables and the failure of all unqualified cables routed with RG-58 cables. Describe any such review(s). If no such review was carried out, explain the basis for deciding no such review was necessary.

26) In deciding that RG-58 cable exposed to a harsh environment did not need to be either qualified or replaced with a qualified cable, did you assume that all these RG-58 cables plus all cables routed w/ RG-58 cable will fail during an accident?

27) Did you review the emergency procedures to verify that none of the functions served by the RG-58 cables are relied on in those procedures? If so, how was that review conducted and what were the results? If not, why not?

REQUESTS FOR IDENTIFICATION AND PRODUCTION OF DOCUMENTS

1) Please identify all documents on which you rely to support your position with respect to Contention I.B2.

2) Please identify all documents which discuss or refer to whether environmental qualification is required for RG-58 cable; why it is or is not environmentally qualified; why it does or does not need to be environmentally qualified; what environmental qualification specifications, if any, have been required or considered for RG-58 cable; whether RG-59 cable meets qualification

specifications or other specifications for RG-58 cable; the locations of RG-58 cable in the Seabrook plant; the functions served by RG-58 cable; and whether or not those functions are considered important to safety.

3) Please identify all documents relied on for purposes of answering the foregoing interrogatories.

4) Within 14 days, please produce the documents identified in response to the preceding requests for the identification of documents. In addition, if they are not already covered by the preceding document request, please produce the following:

a. CASP program and data referred to in the Bergeron Affidavit, dated June 16, 1988;

b. electrical schematic drawing packages referred to in paragraph 7 of the Bergeron Affidavit;

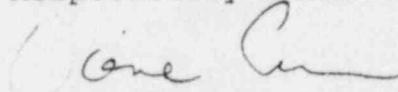
c. All Seabrook Station Cable Raceway Drawings

d. NECNP understands that due to the volume and bulk of the documents requested, it will be necessary to examine most of the documents at the Seabrook plant. However, in order to prepare for our inspection of the documents at the plant, it would greatly assist us to be able to review several documents in advance. Hence, we ask you to provide us, at the office of Harmon & Weiss, with the following: a) one package of raceway drawings and associated diagrams for any one of the 12 RG-58 cables that is to be replaced; and b) Service Environment Design Basis Calculation, Calculation Set No. 6.01.00.00, dated February 2, 1987 (see Attachment C to Bergeron Aff.)

REQUEST FOR ENTRY UPON LAND

1) Please provide access to the Seabrook plant for the purpose of examining all cable raceways.

Respectfully submitted,

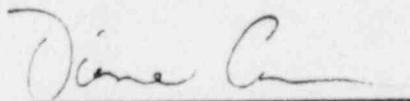


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June 28, 1988

CERTIFICATE OF SERVICE

I certify that on June 28, 1988, copies of the foregoing pleading were served by hand, overnight mail, or first-class mail on all parties to this proceeding, as designated on the attached service list.



Diane Curran
Diane Curran

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'88 JUL -1 P5:05

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