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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)
)
Pacific Gas and Electric Co.)
)
(Diablo Canyon Power Plant Independent)
Spent Fuel Storage Installation))

Docket No. 72-26-ISFSI

PACIFIC GAS AND ELECTRIC COMPANY'S
SUPPLEMENTAL RESPONSE TO SAN LUIS OBISPO MOTHERS FOR PEACE
INTERROGATORIES AND REQUEST FOR PRODUCTION REGARDING CONTENTION 2

Pursuant to 10 C.F.R. §§ 2.740(e)(1) and (e)(2), Pacific Gas and Electric Company ("PG&E") hereby supplements its response to interrogatories and request for production by the San Luis Obispo Mothers for Peace ("SLOMFP" or "Intervenors").¹ Specifically, PG&E supplements its response to SLOMFP General Interrogatory #5 as well as those responses that reference PG&E's response to SLOMFP General Interrogatory #5. The publicly available documents on which PG&E is expected to consider or to rely on in preparing expert testimony may include the following documents, in addition to those identified in PG&E's initial filing:

- "List of Approved Spent Fuel Storage Casks: HI-STORM 100 Revision," 67 Fed. Reg. 14627 (March 27, 2002).
- "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste," 53 Fed. Reg. 31651 (Aug. 19, 1988).

¹ See "Pacific Gas And Electric Company's Response To San Luis Obispo Mothers For Peace Interrogatories And Request For Production Regarding Contention 2," dated February 20, 2008.

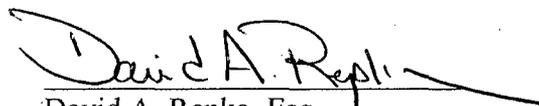
- NUREG-1092, “Environmental Assessment for 10 CFR Part 72 Licensing Requirements for the Independent Storage of Spent Fuel and High-Level Radioactive Waste” (August 1984).
- “Standards for Protection Against Radiation; Republication,” 51 Fed. Reg. 1092 (Jan. 9, 1986).
- Regulatory Guide 8.29, “Instruction Concerning Risks From Occupational Exposures,” Revision 1 (February 1996).
- U.S. Environmental Protection Agency, *Manual of Protective Action Guides and Protective Actions for Nuclear Incidents*, EPA-400-R-92-001 (May 1992).

Two of the documents — “Standards for Protection Against Radiation; Republication” and Regulatory Guide 8.29 — were identified by the NRC Staff in their initial response to SLOMFP’s discovery requests.² The EPA’s *Manual of Protective Action Guides* (“PAGs Manual”) was mentioned as a possible source of information in PG&E’s initial response and was identified by the NRC Staff in its supplemental discovery response.³

² See “NRC Staff’s Response And Objections To San Luis Obispo Mothers For Peace’s First Set of Discovery Requests,” dated Feb. 22, 2008.

³ See “NRC Staff’s Supplemental Response To San Luis Obispo Mothers For Peace’s First Set of Discovery Requests,” dated February 29, 2008.

Respectfully submitted,

A handwritten signature in black ink that reads "David A. Repka". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

David A. Repka, Esq.
Tyson R. Smith, Esq.
WINSTON & STRAWN LLP
1700 K Street, N.W.
Washington, DC 20006-3817

Jennifer Post, Esq.
PACIFIC GAS AND ELECTRIC CO.
77 Beale Street, B30A
San Francisco, CA 94105

COUNSEL FOR PACIFIC GAS AND
ELECTRIC COMPANY

Dated in Washington, District of Columbia
this 7th day of April 2008

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)
)
Pacific Gas and Electric Co.) Docket No. 72-26-ISFSI
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(Diablo Canyon Power Plant Independent)
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CERTIFICATE OF SERVICE

I hereby certify that copies of "PACIFIC GAS AND ELECTRIC COMPANY'S SUPPLEMENTAL RESPONSE TO SAN LUIS OBISPO MOTHERS FOR PEACE INTERROGATORIES AND REQUEST FOR PRODUCTION REGARDING CONTENTION 2" has been served as shown below by electronic mail, this 7th day of April 2008. Additional service has also been made this same day by deposit in the United States mail, first class, as shown below.

Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff
(original + two copies)
e-mail: HEARINGDOCKET@nrc.gov

Judge E. Roy Hawkens
U.S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board
Washington, DC 20555-0001
e-mail: erh@nrc.gov
Erica.LaPlante@nrc.gov

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Mail Stop T-3F23
Washington, DC 20555-0001

Office of Commission Appellate Adjudication
U.S. Nuclear Regulatory Commission
Mail Stop O-16C1
Washington, DC 20555-0001

Diane Curran, Esq.
Harmon, Curran, Spielberg & Eisenberg, LLP
1726 M Street N.W., Suite 600
Washington, DC 20036
e-mail: dcurran@harmoncurran.com

Lisa B. Clark, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Mail Stop O-15D21
Washington, DC 20555-0001
e-mail: OGCMailCenter@nrc.gov
lbc@nrc.gov
Molly.Barkman@nrc.gov

San Luis Obispo Mothers for Peace
P.O. Box 164
Pismo Beach, CA 93448
e-mail: beckers@thegrid.net
jzk@charter.net

Barbara Byron, Staff Counsel
California Energy Commission
Chief Counsel's Office
1516 Ninth Street, MS 14
Sacramento, CA 95814
e-mail: Bbyron@energy.state.ca.us

Timothy McNulty, Esq.
Office of County Counsel
County Government Center Room 386
San Luis Obispo, CA 93408
e-mail: tmcnulty@co.slo.ca.us



Tyson R. Smith, Esq.
Counsel for Pacific Gas
and Electric Company