

DOCKETED  
USNRC

April 7, 2008

April 7, 2008 (11:59am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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 THE NUCLEAR REGULATORY COMMISSION STAFF'S  
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 Nuclear Regulatory Commission Staff ("NRC Staff").<sup>1</sup> Specifically, PG&E supplements its response to NRC Staff Document Request #3, as well as those responses that reference PG&E's response to NRC Staff Document Request #3 and PG&E's response to San Luis Obispo Mothers for Peace General Interrogatory #5.<sup>2</sup> 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:

<sup>1</sup> See "Pacific Gas And Electric Company's Response To The Nuclear Regulatory Commission Staff's Interrogatories And Request For Production Regarding Contention 2," dated February 20, 2008.

<sup>2</sup> 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.

- “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).
- 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.<sup>3</sup> 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.<sup>4</sup>

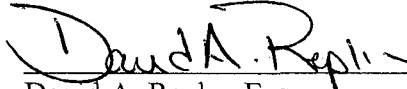
---

<sup>3</sup> See “NRC Staff’s Response And Objections To San Luis Obispo Mothers For Peace’s First Set of Discovery Requests,” dated Feb. 22, 2008.

<sup>4</sup> 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,

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

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

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. )  
)  
(Diablo Canyon Power Plant Independent )  
Spent Fuel Storage Installation) )

Docket No. 72-26-ISFSI

CERTIFICATE OF SERVICE

I hereby certify that copies of "PACIFIC GAS AND ELECTRIC COMPANY'S RESPONSE TO THE NUCLEAR REGULATORY COMMISSION STAFF'S 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](mailto:beckers@thegrid.net)  
[jzk@charter.net](mailto: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](mailto: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](mailto:tmcnulty@co.slo.ca.us)



---

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