

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

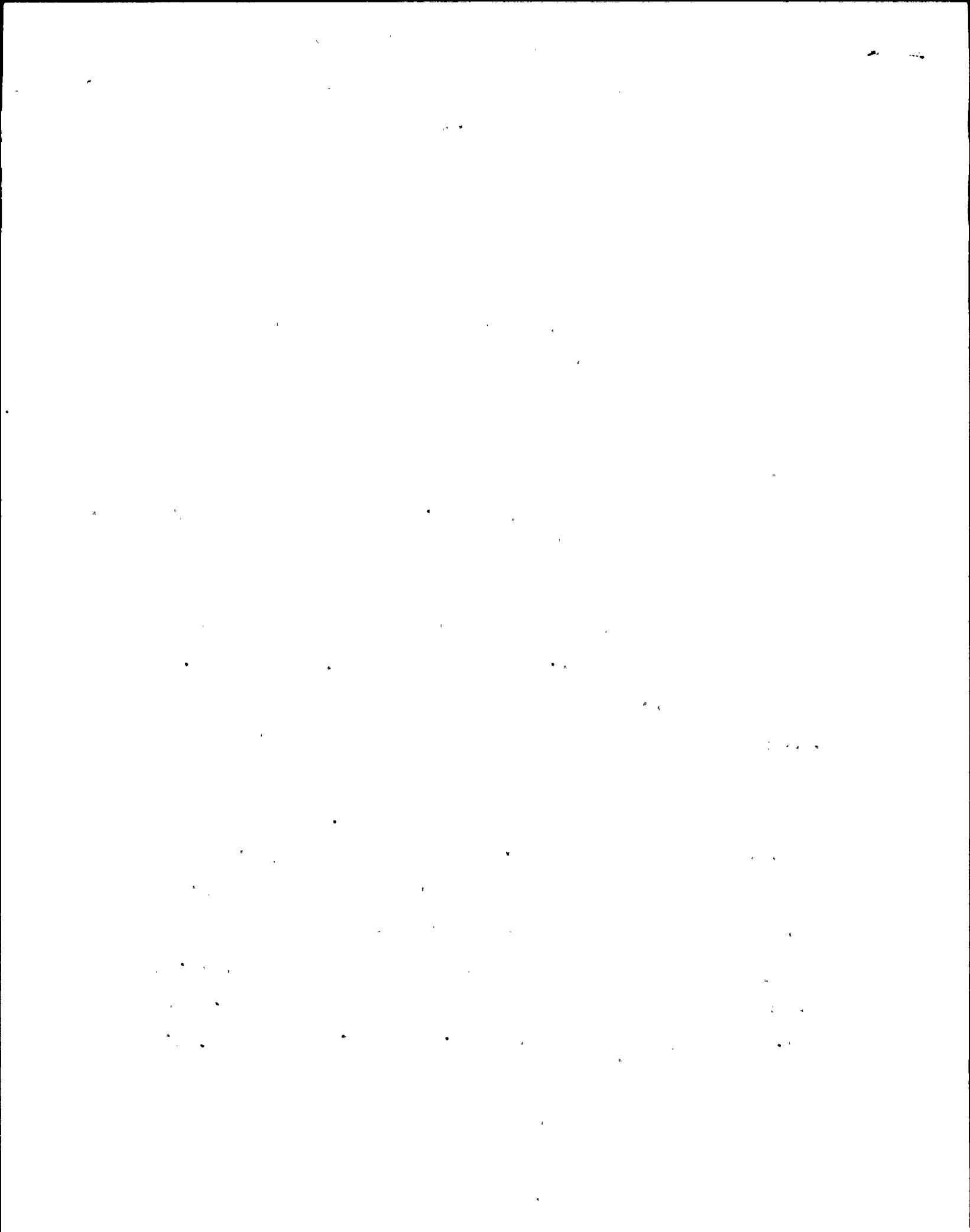
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
PACIFIC GAS AND ELECTRIC COMPANY) Docket Nos. 50-275 O.L.
(Diablo Canyon Nuclear Power Plant,) 50-323 O.L.
Units Nos. 1 and 2))

INTERVENORS' MOTION TO
ADD A BACKFITTING CONTENTION

Intervenors SCENIC SHORELINE PRESERVATION CONFERENCE,
SAN LUIS OBISPO MOTHERS FOR PEACE, SANDRA SILVER, ECOLOGY ACTION
CLUB and JOHN J. FORSTER respectfully move the Board to add the
following contention to those made under the Atomic Energy Act
and the National Environmental Policy Act:

Whether the Staff's Safety Evaluation Report adequately
considers whether backfitting of the Diablo Canyon Nuclear
Generating Station in compliance with the requirements of
10 C.F.R. §109 will provide substantial additional protection
to the public health and safety and, therefore, should be
ordered by the Board and whether the Staff's Final Environmental
Statement and Amendment adequately consider adverse impacts
to the environment that reactor accidents resulting from lack of
backfitting could produce.



The backfitting encompassed by this contention includes, but is not limited to, the following design features for structures, systems and components:

- a) Fire Protection
- b) Reactor Vessel Supports
- c) Reactor Vessel Overpressurization
- d) Anticipated Transient Without Scram (ATWS)
- e) Seismic Qualification
- f) Electrical Equipment Qualification
- g) Code Compliance - ASME
- h) Turbine - Generator Missiles

Intervenors contend that backfitting of each particular design feature individually will provide substantial additional protection to the public health and safety and to the environment, and, therefore, should be ordered by the Board. Intervenors further contend that backfitting of all items that can be backfitted, would, when taken together, provide substantial additional protection to human health and safety and to the environment.

Intervenors further contend that in order to enable the Board to make a definitive safety finding regarding the amount of backfitting that would afford substantial additional protection to health, safety, and the environment, the Board should require the NRC Staff in its SER (1) to list all deviations of the design of the DCNGS from current regulations, regulatory guides, standard review plan and NRC branch technical positions

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data.

In the second section, the author outlines the various methods used to collect and analyze the data. This includes both primary and secondary data collection techniques. The primary data was gathered through direct observation and interviews with key personnel. Secondary data was obtained from internal company reports and industry publications.

The analysis of the data revealed several key trends and patterns. One significant finding was the correlation between certain variables, which suggests a causal relationship. This insight is crucial for understanding the underlying factors influencing the outcomes.

The final section of the report provides a comprehensive summary of the findings and offers practical recommendations for future actions. It highlights the areas where improvements can be made and suggests specific strategies to address the identified issues.

and to explain and document the pros and cons from a safety standpoint of backfitting each such feature, and (2) to list and analyze the safety implications of all unresolved ACRS generic issues and all unresolved issues from the "NRC Technical Safety Activities Report" relevant to PWRs. Furthermore, the Board should require the NRC Staff in the SER to set forth a plan, schedule, and definition of the responsible entity for correcting or resolving each of the above deviations or unresolved issues.

Good cause for granting this motion is shown by the Memorandum of Points and Authorities and the affidavits of Messrs. Hubbard and Bridenbaugh which accompanied "Intervenors' Motion to Add Overpressurization and Backfitting Contentions" dated March 3, 1977 and the Supplemental Memorandum which accompanies this motion. This motion supersedes the March 3, 1977 motion.

Dated: April 29, 1977

Respectfully submitted,

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