

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

3/17/78

In The Matter Of:

PACIFIC GAS AND ELECTRIC COMPANY

(Diablo Canyon Nuclear Power Plant
Units Nos. 1 and 2)

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)
) Docket Nos. 50-275 O.L.
50-323 O.L.
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INTERVENORS' SECOND SET OF INTERROGATORIES
TO THE APPLICANT RELATING TO THE ADEQUACY
OF THE SEISMIC DESIGN OF THE DIABLO CANYON
NUCLEAR POWER PLANT

Pursuant to 10 C.F.R. § 2.740(b), Intervenor SCENIC
SHORELINE PRESERVATION CONFERENCE, SAN LUIS OBISPO MOTHERS
FOR PEACE, SANDRA SILVER, ECOLOGY ACTION CLUB and JOHN J.
FORSTER request Pacific Gas and Electric Company ("Applicant")
to answer the interrogatories set out below.

INSTRUCTIONS

1. Each interrogatory is to be answered separately
and fully in writing under oath or affirmation by the officer
of, employee of, or consultant to the Applicant who has personal
knowledge thereof:

2. In case of an objection, the reasons for the objection shall be stated in full.

3. Answers and/or objections to these interrogatories are due March 31, 1978.

DEFINITIONS

1. "Category 1" refers to those structures, systems and components necessary to assure (a) the integrity of the reactor coolant pressure boundary; (b) the capability to shut down the reactor and maintain it in a safe shutdown condition, or (c) the capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the guideline exposures of 10 C.F.R. § 100.

2. "Magnitude" means the numerical value on the Richter scale.

INTERROGATORIES

1. Identify each structure, system and component that is classified as Category 1. For each system and component provide the building location, the elevation, and the method of seismic qualification. Identify the documents that demonstrate that these structures, systems and components are able to perform

their safety function both during and following a 7.5 Magnitude earthquake on the Hosgri fault.

2. Identify each structure, system, and component, that must remain functional in order to bring the facility to a "hotstandby" phase. For each system and component provide the building location, the elevation, and the method of seismic qualification. Identify the documents that demonstrate that these structures, systems, and components, are able to perform their safety function both during and following a 7.5 Magnitude earthquake on the Hosgri fault.

3. Identify each structure, system, and component, that must remain functional in order to bring the facility to a "cold shutdown." For each system and component, provide the building location, the elevation, and the method of seismic qualification. Identify the documents that demonstrate that these structures, systems, and components, are able to perform their safety function both during and following a 7.5 Magnitude earthquake on the Hosgri fault.

4. Identify those Category 1 structures, systems, and components, that will experience deformation assuming occurrence of a 7.5 Magnitude earthquake on the Hosgri fault.

5. (a) Identify each piece of equipment removed from the plant for seismic qualification testing and/or analysis.

(b) What are the criteria for permitting any such equipment to be returned after testing for use in the facility?

6. (a) What analysis has been conducted on seismically induced accidents during refueling and maintenance

outage? (b) Describe fully the results of any such analysis.

7. Identify the design response spectra and criteria used for evaluation of differential displacements for piping and cabling that (a) pass between buildings and (b) pass from elevation to elevation within buildings.

8. What value has been selected for the operating basis earthquake [10 C.F.R. § 100 (App. A III(d))]? What is the basis for the value selected?

Respectfully submitted,

JOHN R. PHILLIPS
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Attorneys for Intervenors
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San Luis Obispo Mothers for Peace
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Sandra Silver
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March 17, 1978.

By

David S. Fleischaker
DAVID S. FLEISCHAKER

