

SAN LUIS OBISPO MOTHERS FOR PEACE/September 3, 1974

RELATED CORRESPONDENCE

Mr. Philip A. Crane, Jr.
Law Department
Pacific Gas and Electric Co.
77 Beale Street
San Francisco, CA 94106



(Re: Dockets 50-275 & 50-323)

Dear Mr. Crane:

Enclosed on behalf of myself and Mothers For Peace is an interrogatory to which we would appreciate P.G. and E.'s response.

Sincerely yours,

Sandra A. Silver

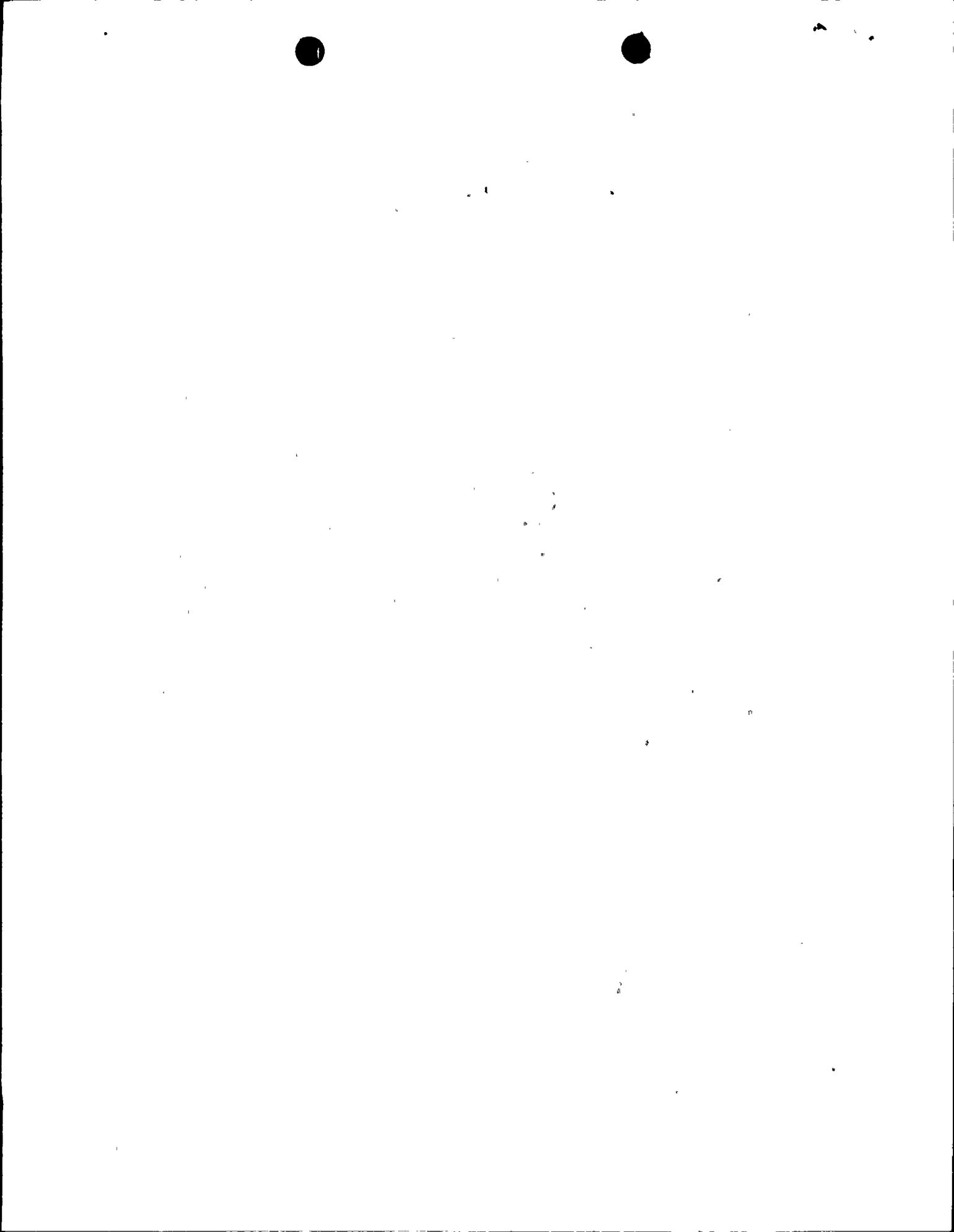
Sandra A. Silver
1315 Cecelia Ct.
San Luis Obispo, CA 93401

Xc with enclosure:
Andrew J. Skaff, PUC
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Richard L. Black, OGC
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Secretary, AEC

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In the matter of
PACIFIC GAS & ELECTRIC CO.
(Diablo Canyon, Units 1 and 2)



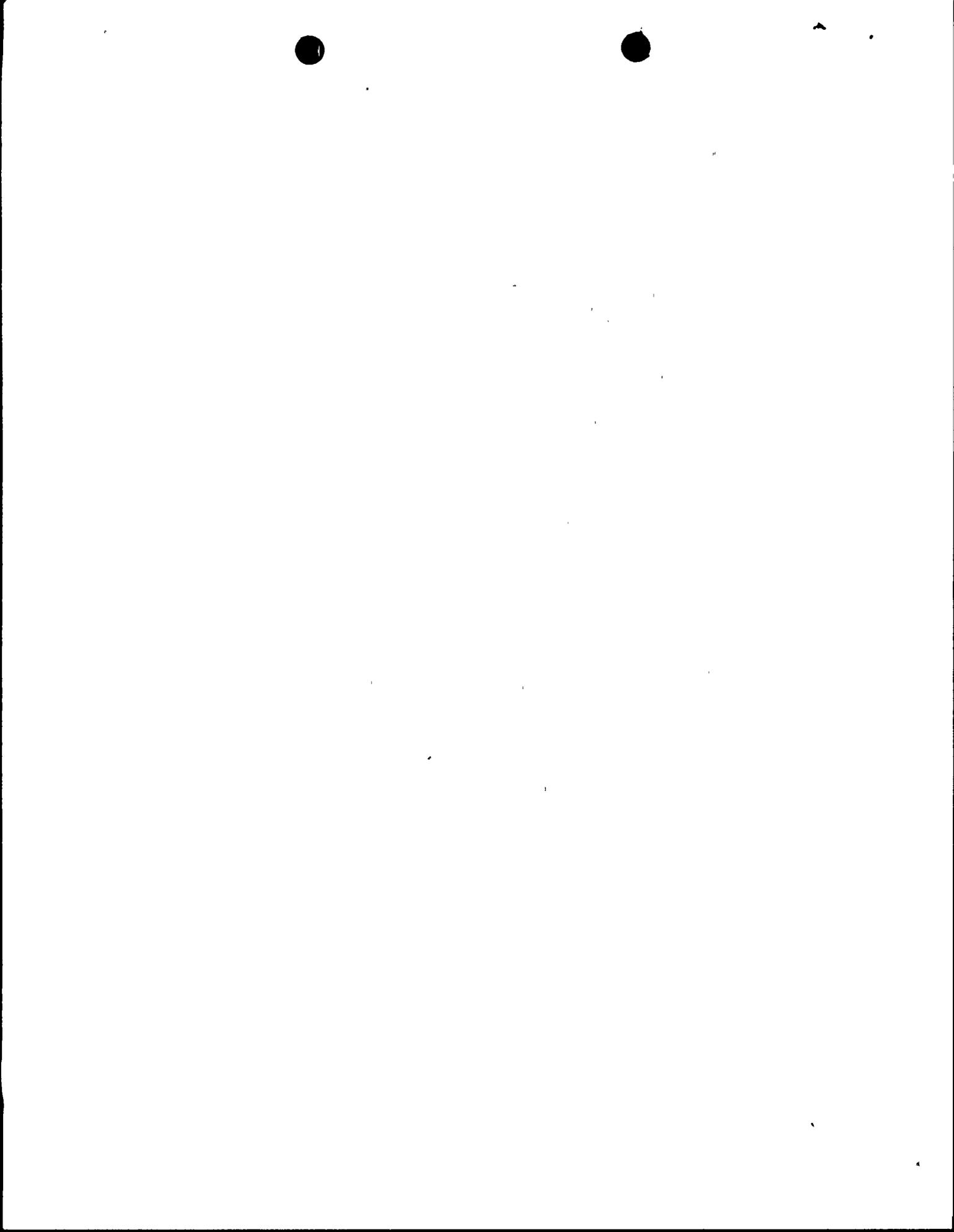
RELATED CORRESPONDENCE

Docket Nos. 50-275-01
50-323-01

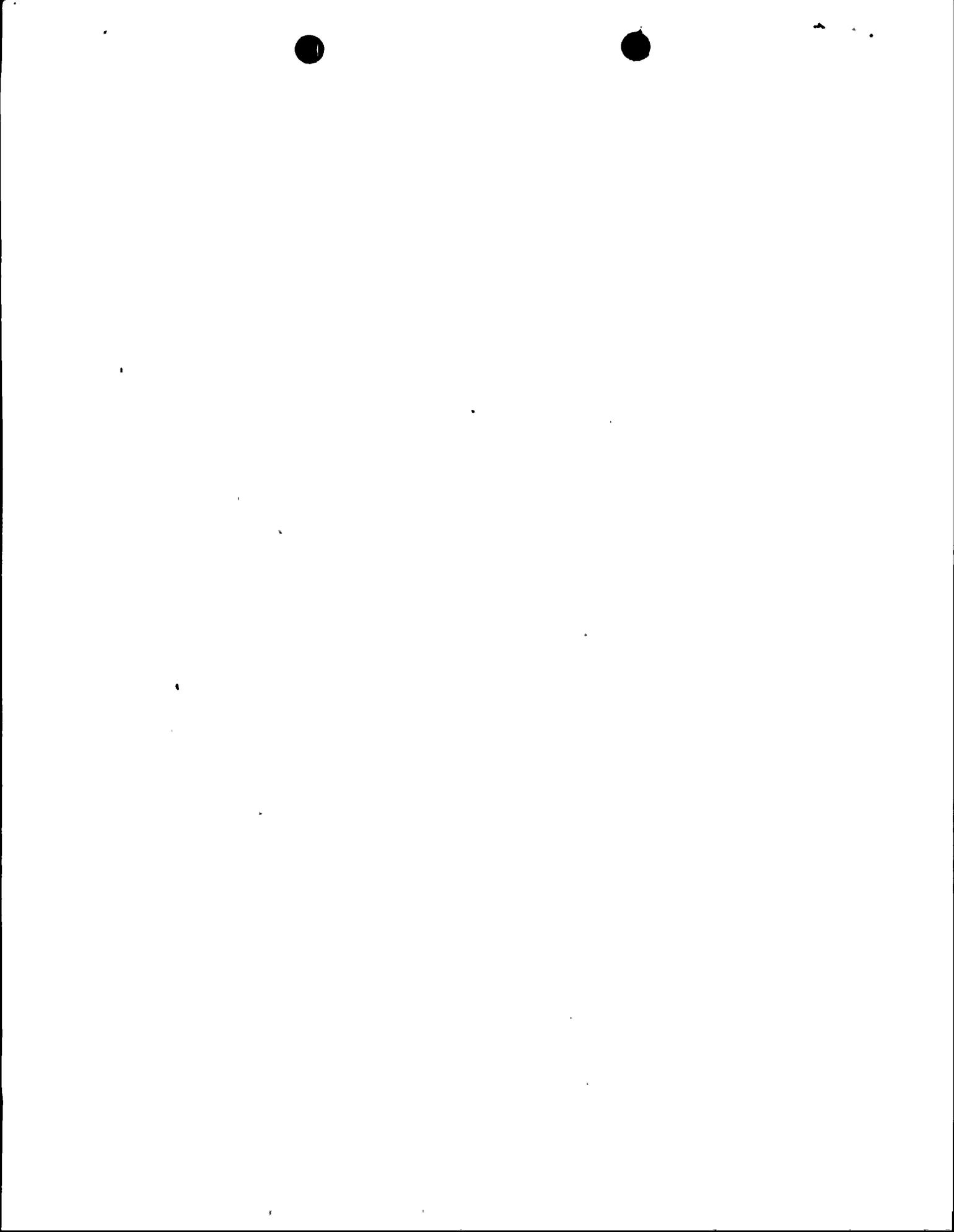
INTERVENOR'S INTERROGATIONS TO APPLICANTS

Intervenor submits the following interrogatories to the applicant (PG&E) to be answered, under oath, by such PG&E personnel as have knowledge of the facts, in accordance with the appropriate provisions of AEC Rules of Practice, 10 CFR 2.740. References in the Interrogations to "PG&E" are to the Pacific Gas and Electric Co., including its officers, employees, and consultants).

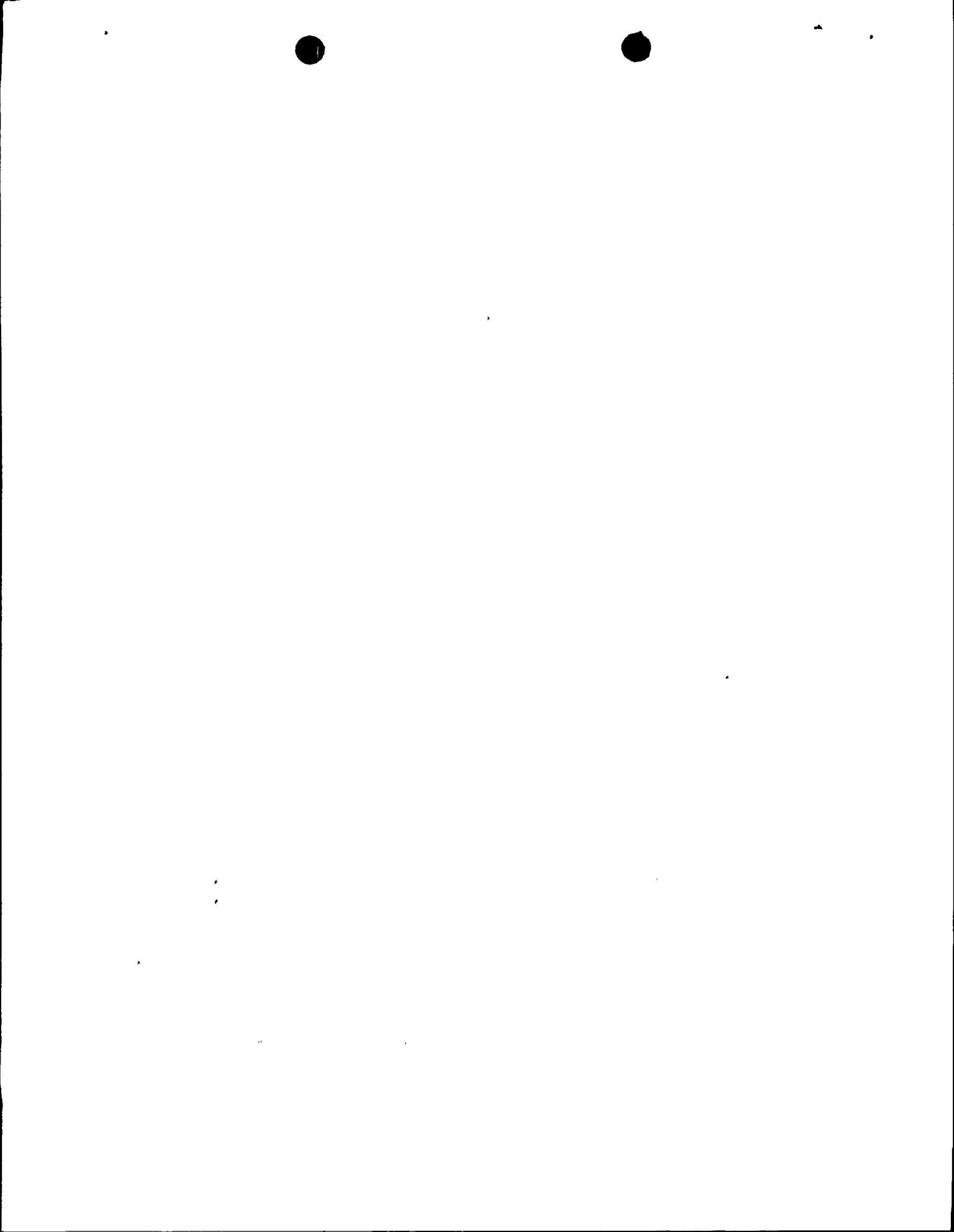
1. To your knowledge have operating model studies been conducted on reactors the size of those being constructed at Diablo Canyon involving:
 - A. destruction of coolant water intake system, including blocking emergency core cooling system?
 - B. other class 8 or 9 accidents requiring public evacuation?
2. If your answer to either part of interrogatory #1 is yes, as to each such answer please set forth:
 - A. Who conducted each such study?
 - B. When was each such study performed?
 - C. Where was each such study performed?
 - D. Whether you would be willing to furnish copies of each such study?
 - E. The minimum time available before complete evacuation would be necessary within:
 1. a one mile radius?
 2. a three mile radius?
 3. a twenty-five mile radius?
 4. a fifty mile radius?
 - F. The length of time each area set forth above would have to remain evacuated?
 - G. The level of radioactive exposure within each area after the evacuation period has been terminated for:
 1. two days
 2. one week
 3. two weeks
 4. one month
 5. one year
3. If your answer to either part of Interrogatory #1 is no, as to each such no answer please set forth:
 - A. Whether you are planning to conduct such studies
 1. If yes, please set forth:
 - a. When they will be completed
 - b. Where they will be completed
4. What are the least severe types of accidents or incidents (albeit of very low probability) that would require evacuation of the plant exclusion area?
5. As to each accident or incident set forth in your answer to Interrogatory #4 please state:
 - A. The class
 - B. A description
 - C. The classification of risk



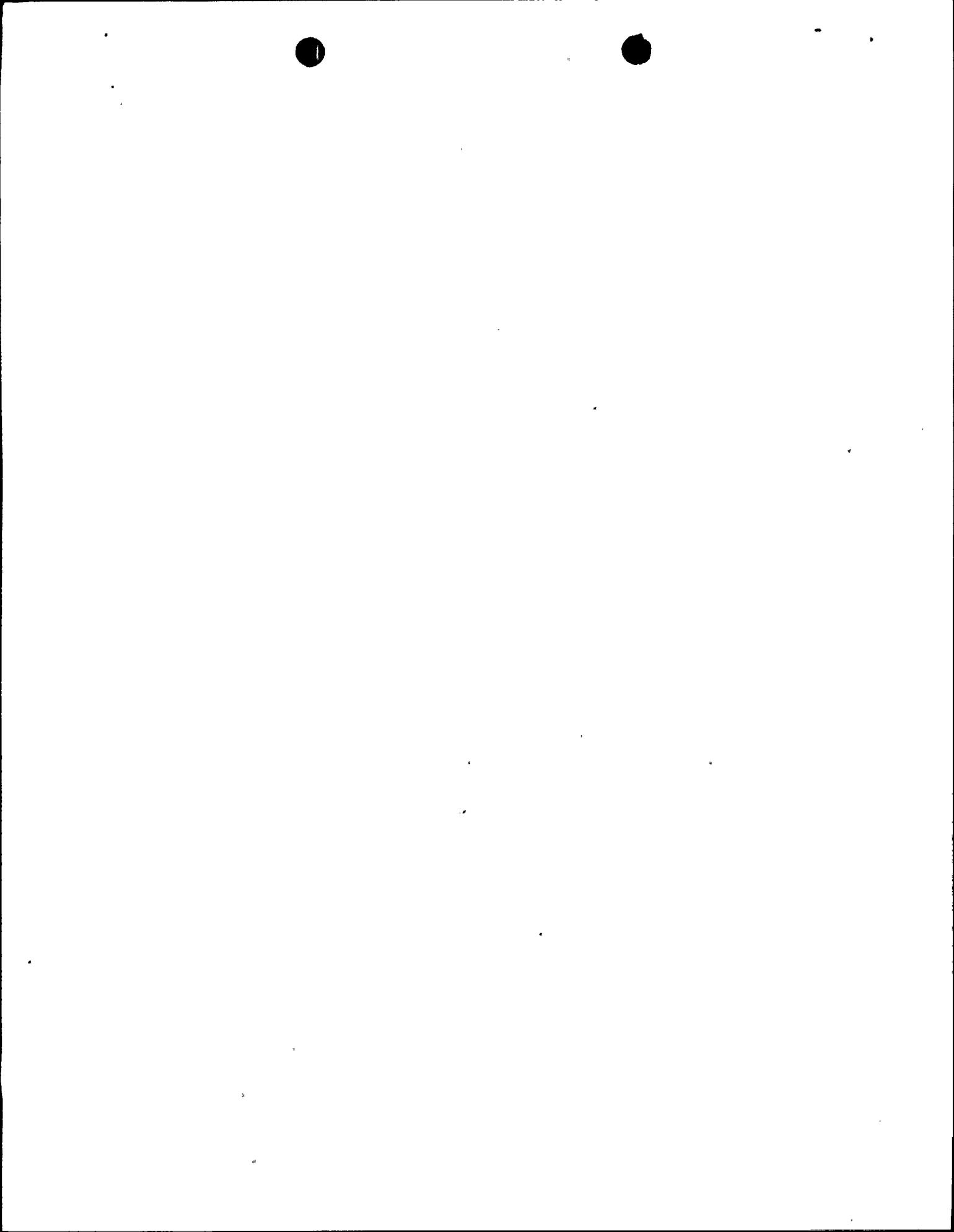
6. Please designate all class 8 and class 9 accidents and intentional damage incidents which would result in radioactive contamination above admissible levels set by the A.E.C. within:
 - A. The exclusion zone
 - B. The low population zone
 - C. A 25 mile radius
 - D. A 50 mile radius
7. Set forth variables postulated in your analysis of each emergency incident designated in answer to Interrogatory #6.
8. Have you established procedures for notifying local, state and federal officials in the event of an emergency at the Diablo Canyon Nuclear Power Plant?
9. If your answer to Interrogatory #8 is yes, please set forth:
 - A. The capacity and title of the person responsible for deciding an emergency is serious enough to give such notice.
 - B. The capacity and title of the person responsible for giving such notice.
 - C. The capacity and titles of all parties who are to receive such notice.
 - D. How such notice is to be communicated.
 - E. What information is to be communicated in such notice.
 - F. How much time would be required to complete notification of all parties set forth in "C" above.
10. Please set forth procedures for control of mobile and contaminated vehicles on roads within exclusion area.
11. As to each procedure set forth in answer to Interrogatory #10, please state the time you have estimated will be required for the completion of the procedure.
12. Do you recognize the existence of any conflict between the corporate interests of PG&E and the health and safety of people in the neighborhood of the Diablo site, in the event of a radioactive release? Please set forth basis for your response.
13. Do you have technological expertise to design and operate units 1 and 2 with zero radioactive emissions?
14. Do you have access to a reactor vendor who has the technology to design and construct a reactor which can operate with "0" emissions of radioactivity?
15. To your knowledge, have any actual model tests been made of reactor systems damage by:
 - A. Impact from aircraft collision
 - B. Sabotage
 - (1) Do you have the results from such studies?
 - (2) If yes, please set forth:
 - a. Size and impact of aircraft which would cause damage which would create radioactivity hazard to persons in the exclusion area.
 - b. Size and impact of aircraft which would cause shut down damage to plant.



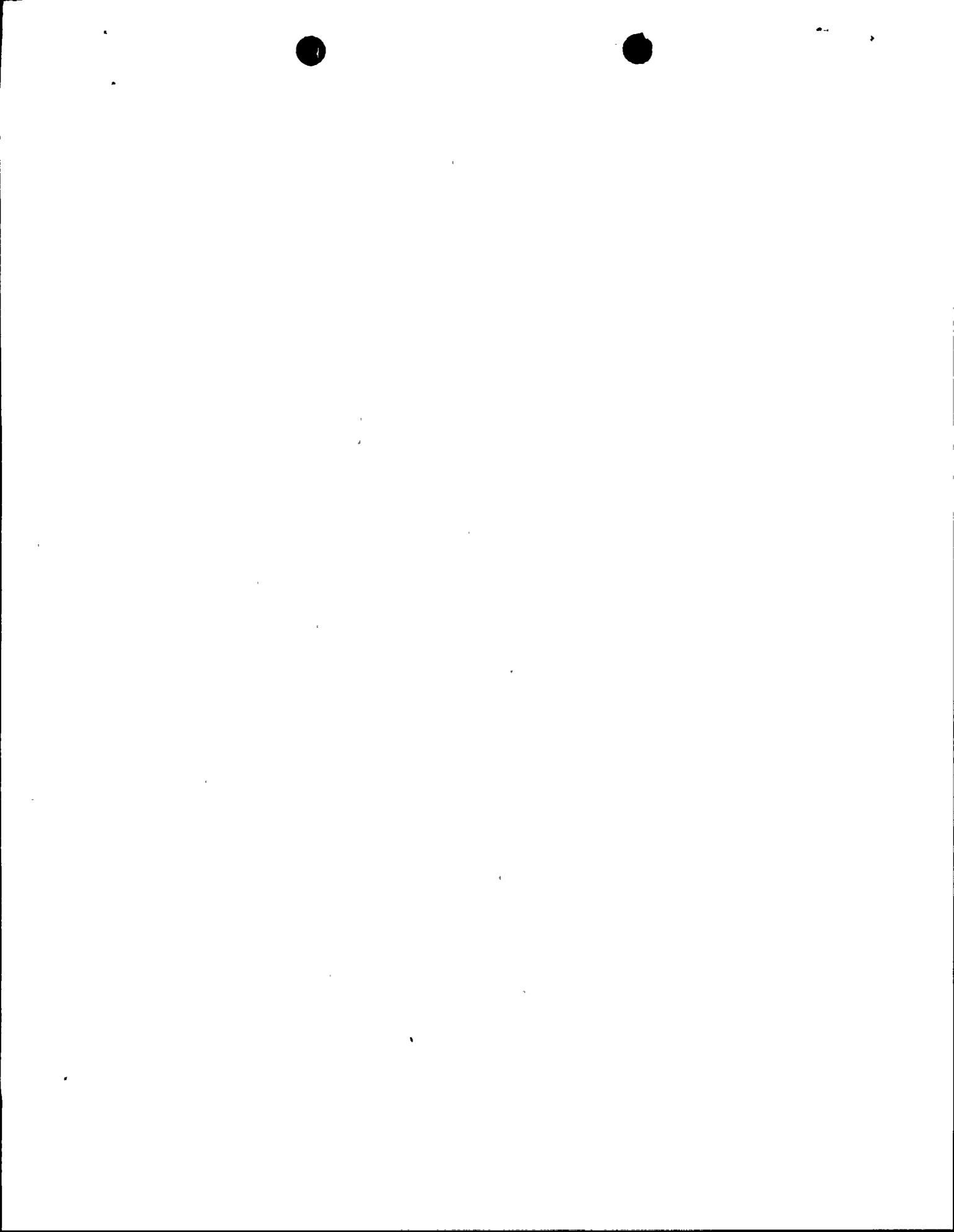
- c. Systems to which shut down damage was caused by sabotage.
- C. If you have the results of similar studies done without actual model tests, please set forth.
- D. What aircraft accident destruction or sabotage destruction have you postulated for the fuel storage facility? Please set forth results.
16. Have you used Zion Units 1 and/or 2 for design comparison with Diablo Units 1 and/or 2?
17. If answer to #16 is no, give the name(s) of the plant(s) used for major design comparison purposes.
18. If answer to #16 is yes, then with respect to Zion Units 1 and/or 2, after fuel loading,
- A. List any incidents or occurrences requiring AEC Regulatory notification giving dates, and description
 - B. List incidents or occurrences that caused (1) a shutdown, and (2) a scram, of Units 1 and/or 2.
 - C. With respect to #18B give duration of each listed shutdown.
 - D. Explain the nature of each problem that caused each shutdown or scram referred to in #18B and explain how the Diablo design will decrease the frequency of occurrence of these problems.
19. What do you expect to be the amount of krypton-85 and tritium released into (1) the air, and (2) the ocean during routine operation, as a function of operating level and core history for each unit?
20. Under conditions of routine and maximum power level operation of Units 1 and 2, give the amount of each plutonium isotope produced within the reactor per unit time or per kilowatt-hr.
21. For each plutonium radio-isotope listed under #20, give the percentage of containment anticipated and basis for reply.
22. List the pathways and mechanisms of plutonium transfer (albeit small) into the environment from Units 1 and 2.
23. Reference Diablo FSAR 16.4-68 paragraph 3 (Amen. #5, March 1974) "..... under unusual operating conditions which may temporarily result in releases higher than such small fractions,....." please set forth such unusual operating conditions.
24. Are radioactive monitoring devices installed in the stack?
- A. If answer is no, how will radioactive emissions into the atmosphere be monitored?
 - B. If answer is yes, please set forth:
 - 1. Number of such devices
 - 2. Number which serve redundant or back-up purposes
 - 3. Which devices operate continuously
 - 4. Which devices operate only during planned releases or special circumstances
 - 5. Special circumstances referred to in #24-B-4
 - 6. How stack-emitted nuclides will be identified
25. How will tritium and krypton stack emissions be monitored?



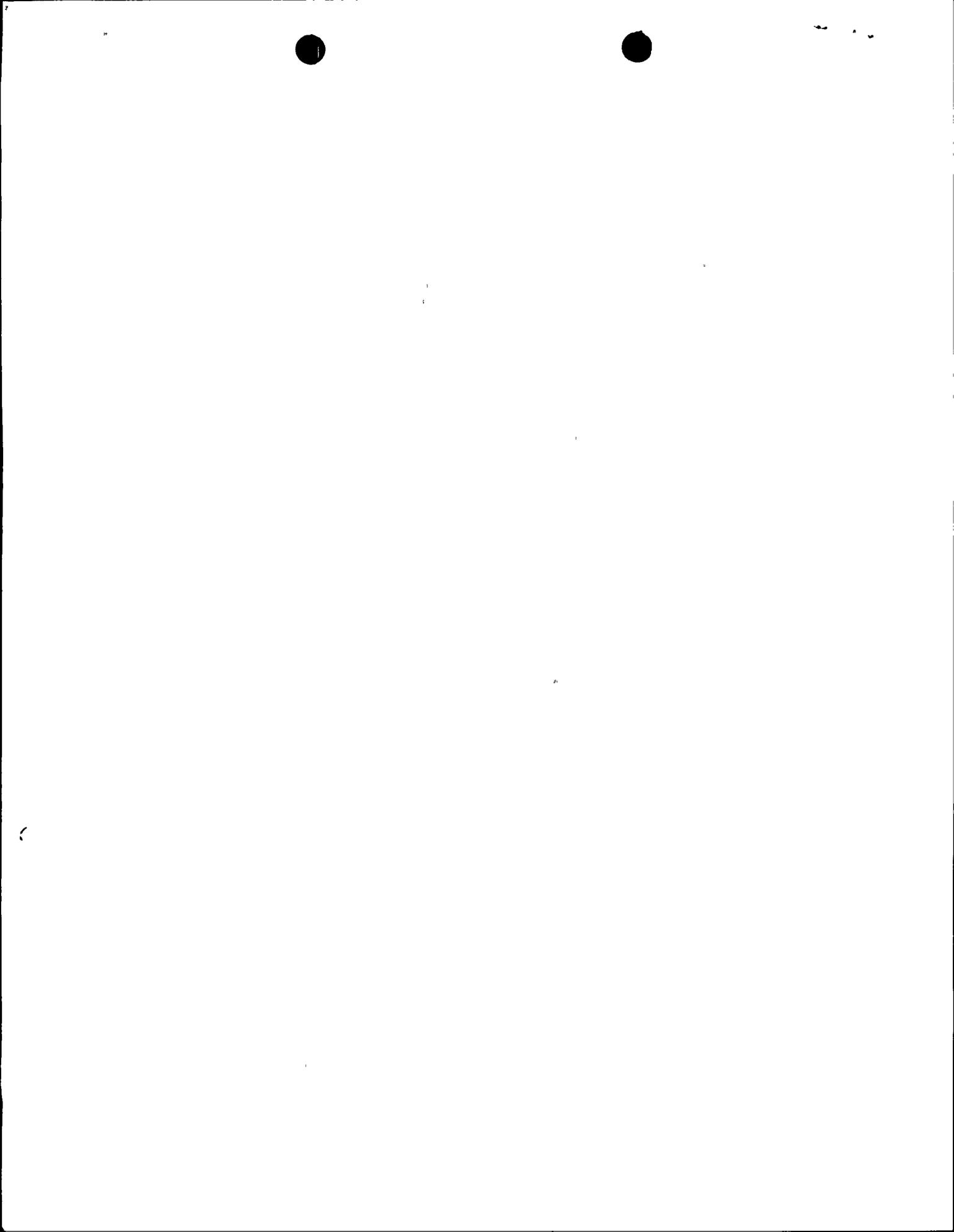
26. Will any schools within a 25-mile radius of the plant site have radioactive monitoring devices after start-up?
- A. If yes,
 1. Identify the schools
 2. Identify, by make and model number, the devices
 3. Give the frequency of reading for each of these devices
 4. Who will read the devices
27. Do any schools within a 25-mile radius of the plant site now have radioactive monitoring devices for gathering baseline data?
- A. If yes,
 1. Identify the schools and date of device installation
 2. Identify, by make and model number, the devices
 3. Give the frequency of reading for each of these devices.
 4. Who has or does read these devices
28. With respect to pre-startup, or baseline data on strontium-90 in milk, set forth:
- A. Dairies where milk is checked
 - B. Who checks the milk
 - C. The frequency of checking
 - D. Dairies where milk is checked which are downwind from the plant site under the two most common wind direction conditions.
29. Answer all parts of interrogatory #28 with respect to iodine-131 in beef thyroid.
30. In view of the severe economic instability of dairies in the Central Coast region, and the attendant high probability of economic failure, justify the small number of dairies listed under answers to interrogatories 28D and 29D.
31. With respect to interrogatory #30, what steps can be taken, at this time, to assure the collection of legitimate strontium-90 and iodine-131 downwind baseline data?
32. Reference FSAR, p. 16.4-65, first sentence "The requirement that fuel movement be delayed for 100 hours...." Explain the meaning of this sentence.
33. According to the updated and current schedule, set forth
- A. Fuel assembly arrival on the site, for units 1 and 2.
 - B. Fuel loading dates for units 1 and 2.
34. Identify, by date and subject, all reports pursuant to 10CFR50.55(e) forwarded to the AEC by PG&E relating to Diablo Canyon Units 1 and 2.
35. With respect to Diablo spent-fuel, do you know the place or places where it will initially be reprocessed?
- A. If answer to above is no, explain
 1. Why you don't know
 2. When you will know
 - B. If answer to above is yes,
 1. Give name(s) of place(s)
 2. For each place identified under interrogatory #35-B-1, give route and mode of transportation to reprocessing plant(s) from the time the spent-fuel cask is removed from the spent-fuel pool, giving as accurate a time schedule, as possible, for each route.



3. Give location and route for initial shipment.
36. With respect to Diablo fresh fuel assemblies, do you know the location(s) of the fabricating plant(s) from which they will be sent to the Diablo Canyon site?
- A. If answer is no, explain
 - 1. Why you don't know
 - 2. When you will know
 - B. If answer is yes, give
 - 1. Name of each location
 - 2. For each location, the route, mode of transportation, and time schedule, up to arrival at fuel-handling building.
 - 3. Location of initial loading source
37. With respect to Diablo drummed radwaste do you know the location(s) of the processing or waste-management facilities to which the drums will be taken?
- A. If answer is no, explain
 - 1. Why you don't know
 - 2. When you will know
 - B. If answer is yes, set forth
 - 1. Name of each location
 - 2. For each location, the route, mode of transportation, and time schedule beginning with the exit from the drumming station.
38. For interrogatories #35, 36, and 37, please set forth where PGandE's responsibility and liability begins and ends.
39. Describe the nature, consequences, and emergency procedures to be taken in the event of a spent-fuel cask melt-through when cask is on a
- A. Truck
 - B. Train
40. Describe procedures and frequency employed in checking spent-fuel shipping casks for leakage on truck and train.
41. In the event of an accident with the possibility of a hazardous radioactive leak, who notifies PGandE and/or AEC, and, how is notification made, for a
- A. Truck accident
 - B. Train accident
42. For irradiated-fuel shipments, please set forth the criteria employed to distinguish whether an apparent leak is radioactive or not, and whether or not it is reportable under AEC, Dept. of Transportation, or other agency regulations.
43. On trucks and trains transporting spent-fuel or radwastes, are personnel
- A. Equipped with radiation monitors
 - B. Equipped with radiation leak detectors
 - C. Equipped with any kind of portable radioactivity monitors, excluding dosimeters. Describe.
44. To what degree, if any, are personnel trained to use monitors referred to in interrogatory #43?
45. For a spent-fuel-carrying truck, under what circumstances can the truck be left un-attended?



46. Please indicate who notifies the county sheriff, and how the notification is made, when a possibly dangerous accident appears to have occurred to a spent-fuel-carrying truck or train?
47. Who, if anyone, is to notify the San Luis Obispo County Sheriff's Office when a shipment of fresh or irradiated fuel enters or leaves the county?
48. Reference FSAR, p. 13.3-5 (March 1974). What provisions are made to ensure reliable operation of Company Telephone System and company's UHF Radio Network, in the event of the loss of on-site and off-site power?
49. Reference "San Luis Obispo County Sheriff's Department: Interim Evacuation Plan, Diablo Canyon Power Plant, June, 1974" (hereinafter referred to as SLO-IEP) p.4. Please explain contents of III.Scope, paragraph 2.
50. Reference SLO-IEP, p.7, par.E. Please set forth how, in the case of a radioactive disaster, PGandE personnel will perform off-site meteorological surveys. Indicate also, where surveys will be made, what variables will be measured, how long total survey will take, how PGandE Emergency Coordinator will be notified.
51. With respect to interrogatory #50, describe training (if any) PGandE personnel making meteorological survey will take.
52. Reference SLO-IEP, p.7, par. H. Please explain why it is necessary for the PGandE Coast Valleys Division Manager to assign a representative to the Sheriff's Dept. to handle public relations and information releases to news media, in view of the fact that the Sheriff's Dept already has public relations personnel in its employ. Set forth required training and normal responsibility of representative.
53. With respect to interrogatory #52, set forth basis (if any) for concluding that PGandE penetration into Sheriff's public relations division is in the public interest and does not constitute a possible conflict of interest.
54. Reference SLO-IEP, p.9, par. D. Please set forth reasons for the potential of a Class D incident when it is asserted parenthetically that "there is no design basis accident which falls into the Class D category."
55. Reference SLO-IEP p. 9 par. VII-A. Distinguish between a severe Class C release and a Class D release.
56. Please list the accidents which could cause a "severe Class C" release. (Reference SLO-IEP, p.9, par. VII-A.)
57. On what frequencies does the Company's UHF radiotelephone system operate?
58. Which frequencies (if any) of those referred to in interrogatory #57 are reserved for radiological-disaster use?
59. Reference SLO-IEP, p. 12, par. IX.B.3. Identify by make and model number, the Radiological Monitor.
60. Reference SLO-IEP, flow diagrams un-paginated but following p. 13. How does Watch Commander determine off-site wind directions?



61. Reference SLO-IEP, p. E1, par. A.L. In order to avoid confusion, who determines the qualifications of the radiological monitor referred to?
62. Reference FSAR 13.3-7 (March 1974). Is a U.S. Coast Guard Vessel always in the neighborhood of Diablo Canyon?
 - A. If yes, please set forth
 1. The vessel's maximum distance from Diablo Cove during cruises or exercises.
 2. How vessel personnel will protect themselves from radioactive contamination.
 - B. If no, how will off-shore people be notified and removed to a safe location in the event of a disaster?
63. In the event of a bomb threat received by telephone or other manner, please set forth procedures to be instituted.
64. Reference FSAR 13.3-16, par. 3 (Mar., 1974). Please set forth locations where, in the event of a nuclear disaster, off-site meteorological conditions and downwind radiological samples could be obtained.
65. Since protection of the public health and safety is one of the asserted reasons the public is denied routine access to the Site Exclusion Area, please set forth how close the public is allowed to approach PGandE's Diablo site from the sea.
66. Reference Figures 15.4-20 and 15.4-54 (both of March, 1974) of FSAR. Corresponding to each figure, please present actual, unsmoothed curves, showing actual computed data points. Please set forth the uncertainties, in degrees Fahrenheit, associated with each point.
67. What is the PGandE's brief estimate of uncontrolled release of radioactive materials to the environment resulting from each of the following acts of sabotage:
 - A. Direct impact, at the most vulnerable part of the containment structure, by a fully loaded and fueled Boeing Model 747 Strato-cruiser, at a velocity of 400 nautical miles per hour?
 - B. Infiltration and entry by a saboteur, who implants with a timed detonation system, 75 pounds of T.N.T. at various critical locations in the reactor primary cooling system, ECCS components, and at gas decay tank, so that simultaneous explosions occur in both areas?
 1. Present bases for such predictions.
68. Will PGandE provide Intervenor with copies of all documents, records, and correspondence relating to the preceding interrogatories without an order to produce?
 - A. If not, explain.
69. Will PGandE provide Intervenor with copies of all documents, records, and correspondence relating to on and off-shore geology, seismicity, and structural engineering, without an order to produce?
 - A. If not, explain.

Sandra A. Silver
Sandra A. Silver

Dated: *Sept. 3, 1974*

