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NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

PACIFIC GAS & ELECTRIC COMPANY

(Diablo Canyon Units 1 and 2)

Docket Nos. 50-275
50-323

Place - Avila Beach, California

Date - 4 January 1979

Pages 7375 - 7396

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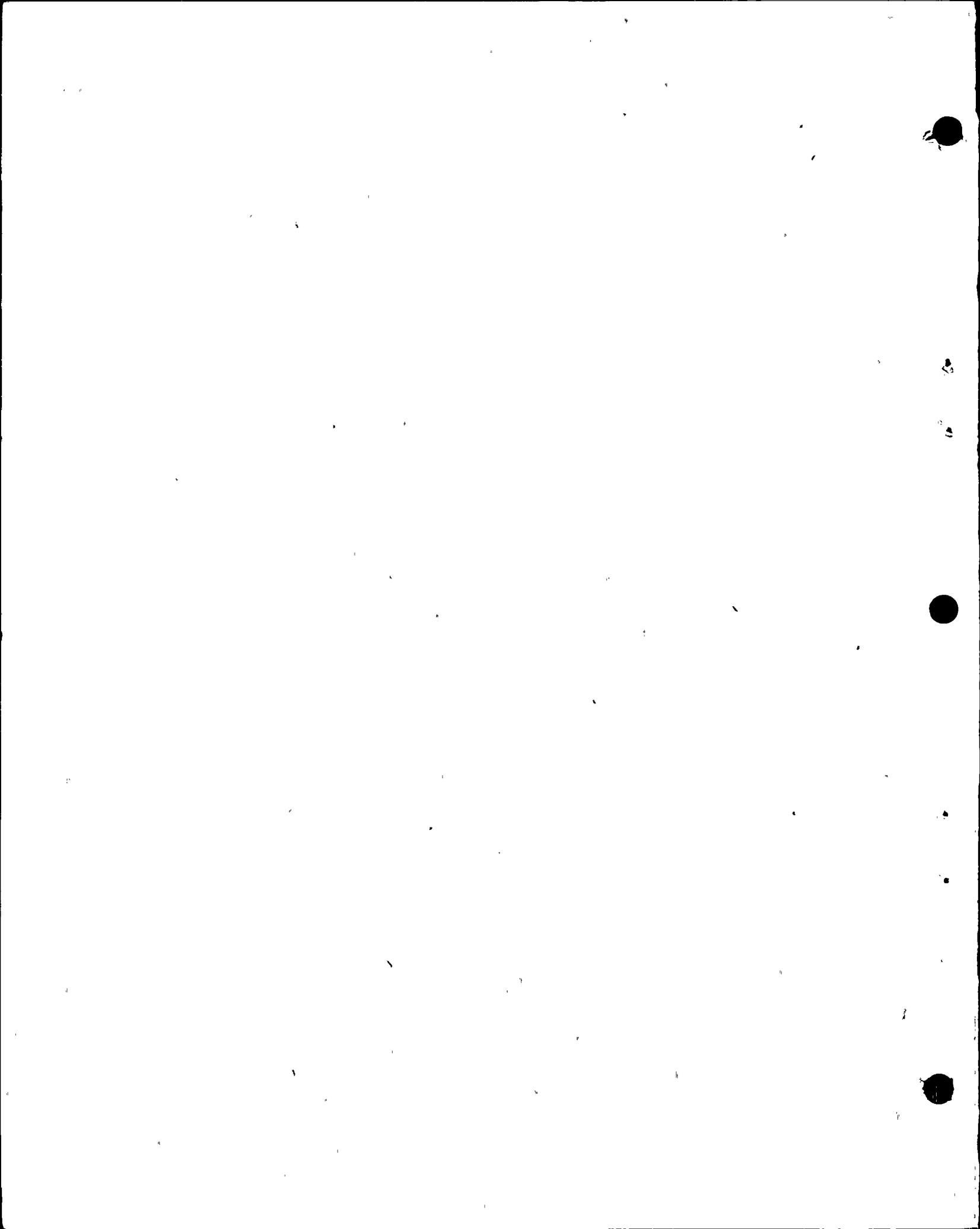
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NUCLEAR REGULATORY COMMISSION

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PACIFIC GAS & ELECTRIC COMPANY

(Diablo Canyon Units 1 and 2)

Docket Nos: 50-275

50-323

Cavalier Room,
San Luis Bay Inn,
Avila Beach, California.

Thursday, January 4, 1979.

The hearing in the above-entitled matter was reconvened, pursuant to adjournment, at 8:30 a.m.

BEFORE:

ELIZABETH BOWERS, Esq., Chairman,
Atomic Safety and Licensing Board.

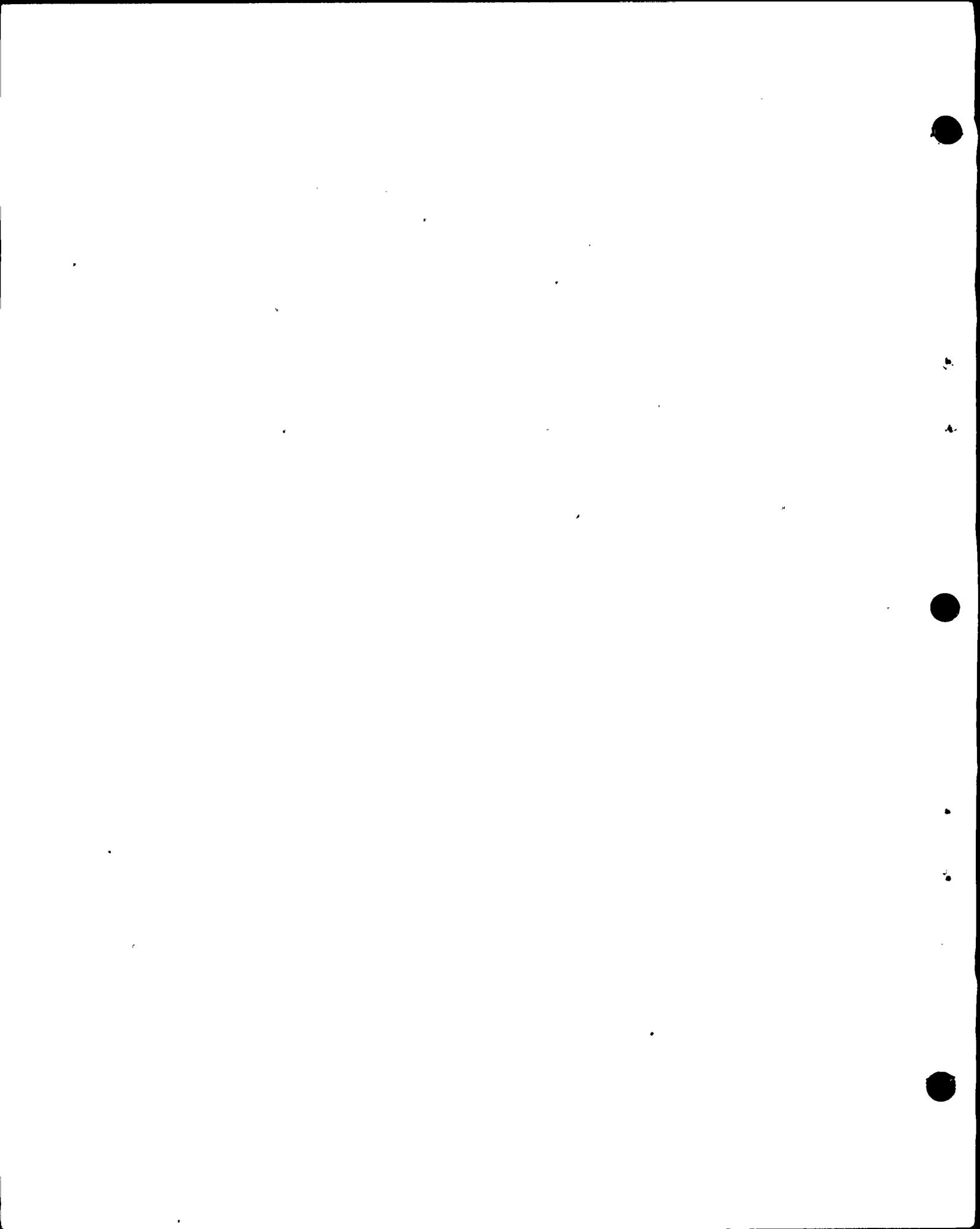
DR. WILLIAM E. MARTIN, Member.

GLENN O. BRIGHT, Member.

APPEARANCES:

BRUCE NORTON, Esq., 3216 No. Third Street,
Phoenix, Arizona 85012.

MALCOLM H. FURBUSH, Esq. and PHILIP CRANE, Esq.,
Legal Department, Pacific Gas & Electric Company,
77 Beale Street, San Francisco, California 94106.



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On behalf of the Joint Intervenor:

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DAVID S. FLEISCHAKER, Esq., Suite 602,
1025 15th Street N.W., Washington, D.C.

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4

STEPHEN KRISTOVICH, Esq., Center for Law in
the Public Interest, 10203 Santa Monica Boulevard,
Los Angeles, California 90067.

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On behalf of the Regulatory Staff:

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JAMES R. TOURTELLOTT, Esq. and EDWARD KETCHEN, Esq.,
Office of Executive Legal Director, U.S.
Nuclear Regulatory Commission,
Washington, D.C. 20555.

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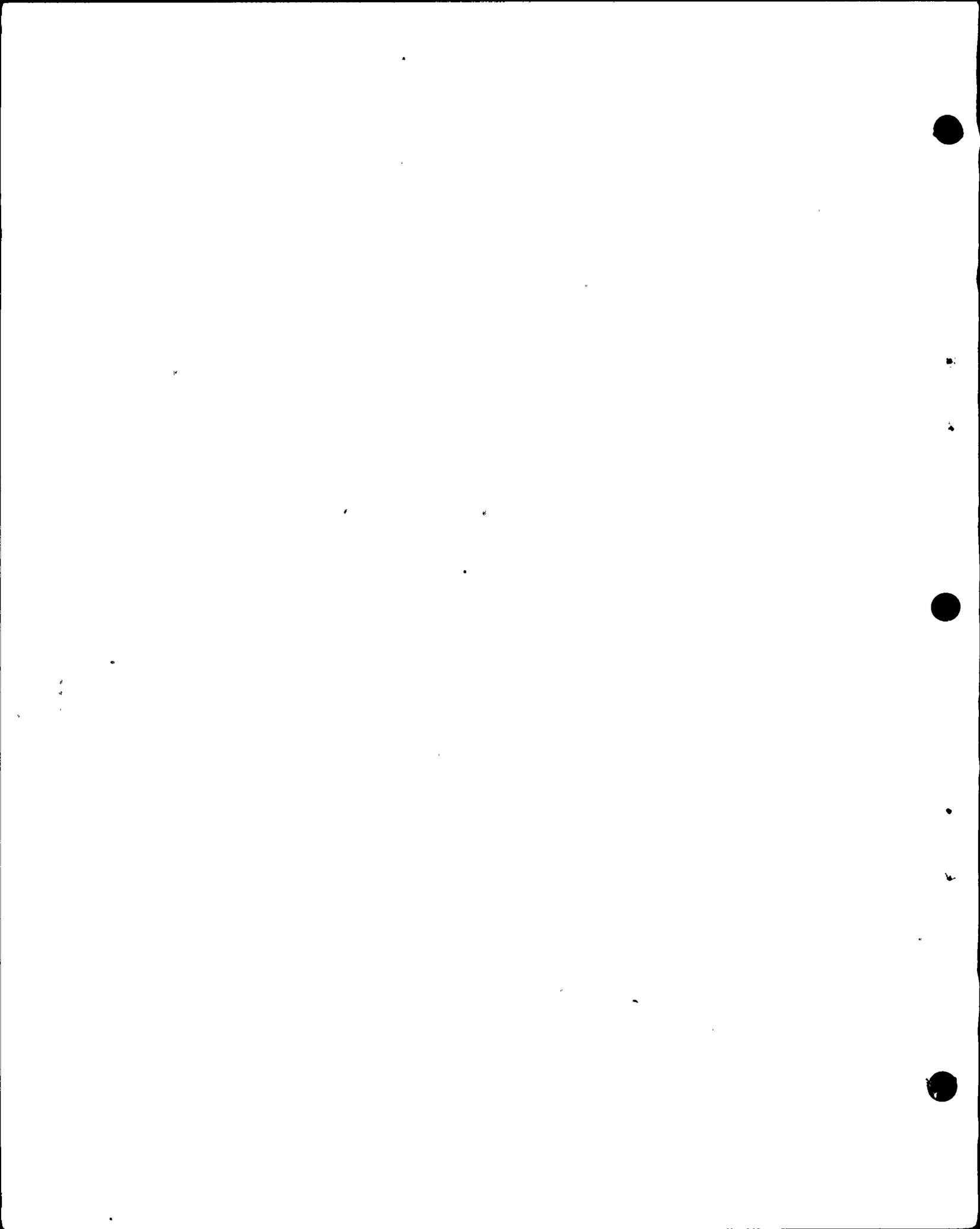
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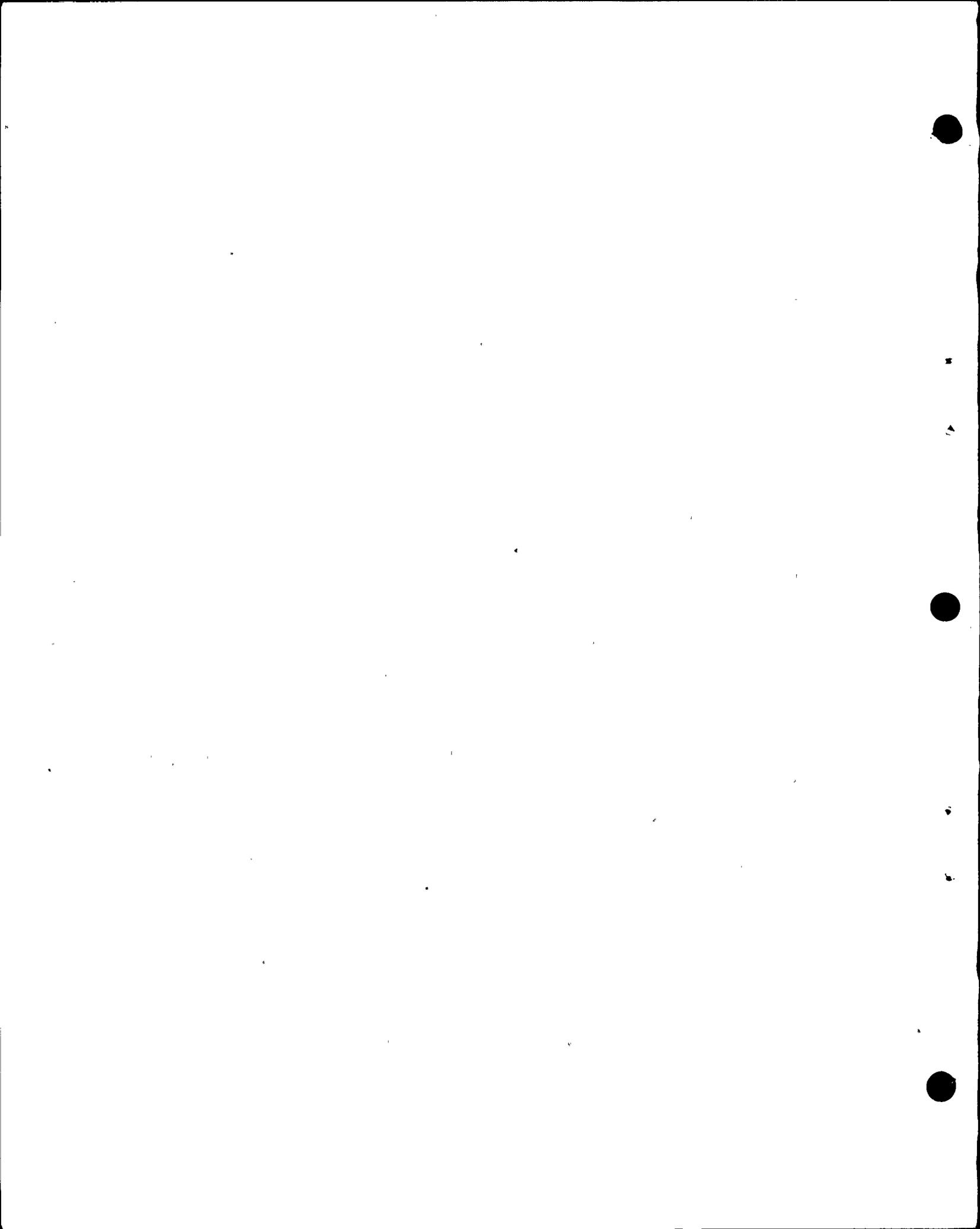
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C O N T E N T S

					Exam	CX on
	<u>Witnesses:</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>	<u>by Bd Ed Qs</u>
1						
2						
3	John A. Blume)	7178	7182		7297	7211
	Vincent J. Ghio)					
4	David A. Lang)					
	Ralph T. Yokoyama)					
5	Chung M. Li)					
	David Williams)					
6						
	John A. Blume)	7220	7225		7252	
7	Vincent J. Ghio)			7257	7262	7264
	David A. Lang)					
8	David Williams)					
	John A. McLaughlin)					
9	Ming E. Lee)					
10	John A. Blume)	7278	7287		7337	
	Vincent J. Ghio)			7341	7348	
11	Dilip P. Jhaveri)					
	Oscar A. Rocha)					
12	David Williams)					
	Ralph Yokoyama)					
13						
	John A. McLaughlin)	7322	7325			
14	Robert T. Lawson)					
	Takehazu Udaka)					
15	Ming E. Lee)					
	John A. Blume)					
16						
	Otto W. Steinhardt)	7353	7375		7382	
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P R O C E E D I N G S

MRS. BOWERS: We'll be on the record.

May we have the panel identified.

Whereupon,

JOHN A. BLUME,

VINCENT J. GHIO,

DAVID A. LANG,

RALPH T. YOKOYAMA,

CHUNG M. LI

and

DAVID WILLIAMS

resumed the stand as witnesses on behalf of the applicant,
and, having been previously duly sworn, were examined and
testified further as follows:

MR. NORTON: Mrs. Bowers, this panel is going to
be discussing the turbine building. I have a list that has
those two reversed, that's my problem. It's going to be
the turbine building.

DIRECT EXAMINATION

BY MR. NORTON:

Q Mr. Ghio, do you have any corrections to the
testimony, the section of the testimony on the turbine
building at this time?

A (Witness Ghio) Yes, one minor correction.

On the last page of this piece of testimony,

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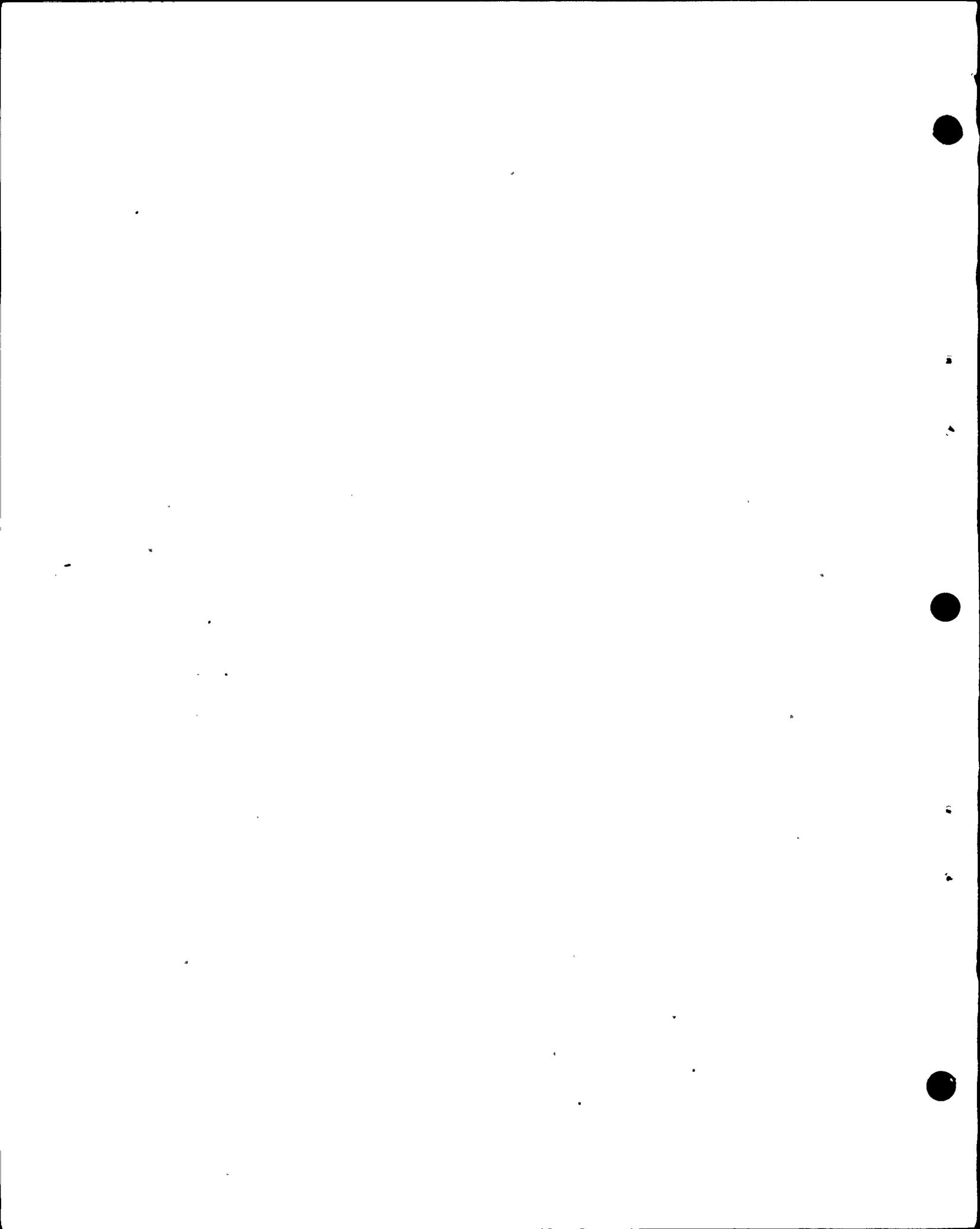
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Page Six, Line Three, insert a comma after the word "cables."

2 That's the only correction.

3 Q Mr. Ghio, at this time can you give a short
4 summary of the testimony regarding the turbine building?

5 A The turbine building, as was the case for the
6 previously discussed structures, has been reviewed for both
7 the Blume and Newmark free field response spectra, and then
8 spectra corrections were made using tau filtering to make
9 a structure-specific spectra for the turbine building.

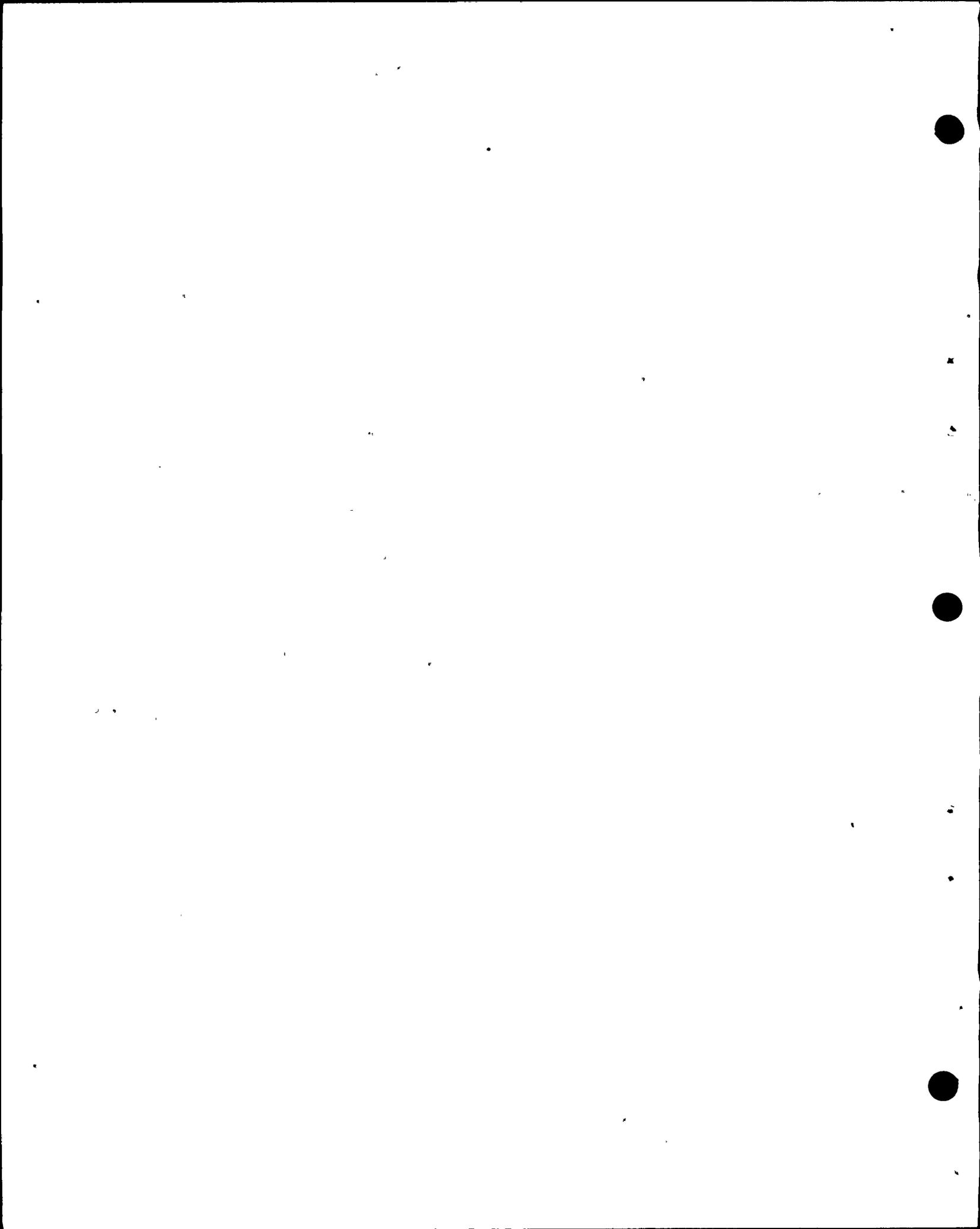
10 The vertical spectra were taken as 2/3rds of the
11 horizontal spectra. Seven percent damping was used, average
12 material strengths, determined from actual tests of the materials
13 used in the building, were incorporated in the analysis.
14 Accidental torsion was considered by a 10 percent increase
15 in all responses resulting from the translational analyses.

16 The testimony goes on to discuss the models that
17 were used in the analyses, and then summarizes the results
18 of the analyses.

19 These results indicated that the unmodified turbine
20 building did not perform satisfactorily under the postulated
21 7.5 magnitude Hosgri seismic motions. Substantial structural
22 modifications have been required for the turbine building.

23 In this summary, I will briefly highlight the
24 main features of the modifications.

25 New exterior concrete buttresses, anchored by a



wrb/agb3

1 combination of ties to the existing building, drilled piers
2 or caissons and grouted rock bolts into the underlying rock
3 were required,

4 Shear walls in both the north-south and east-west
5 orientations in the building below elevation 104 were
6 strengthened. Existing floor grating have been substantially
7 replaced by steel plate plate at elevations 104 and 119.

8 New concrete shear walls along the east and west
9 sides of the building have been added. New vertical and
10 horizontal steel bracing have been added in the building.

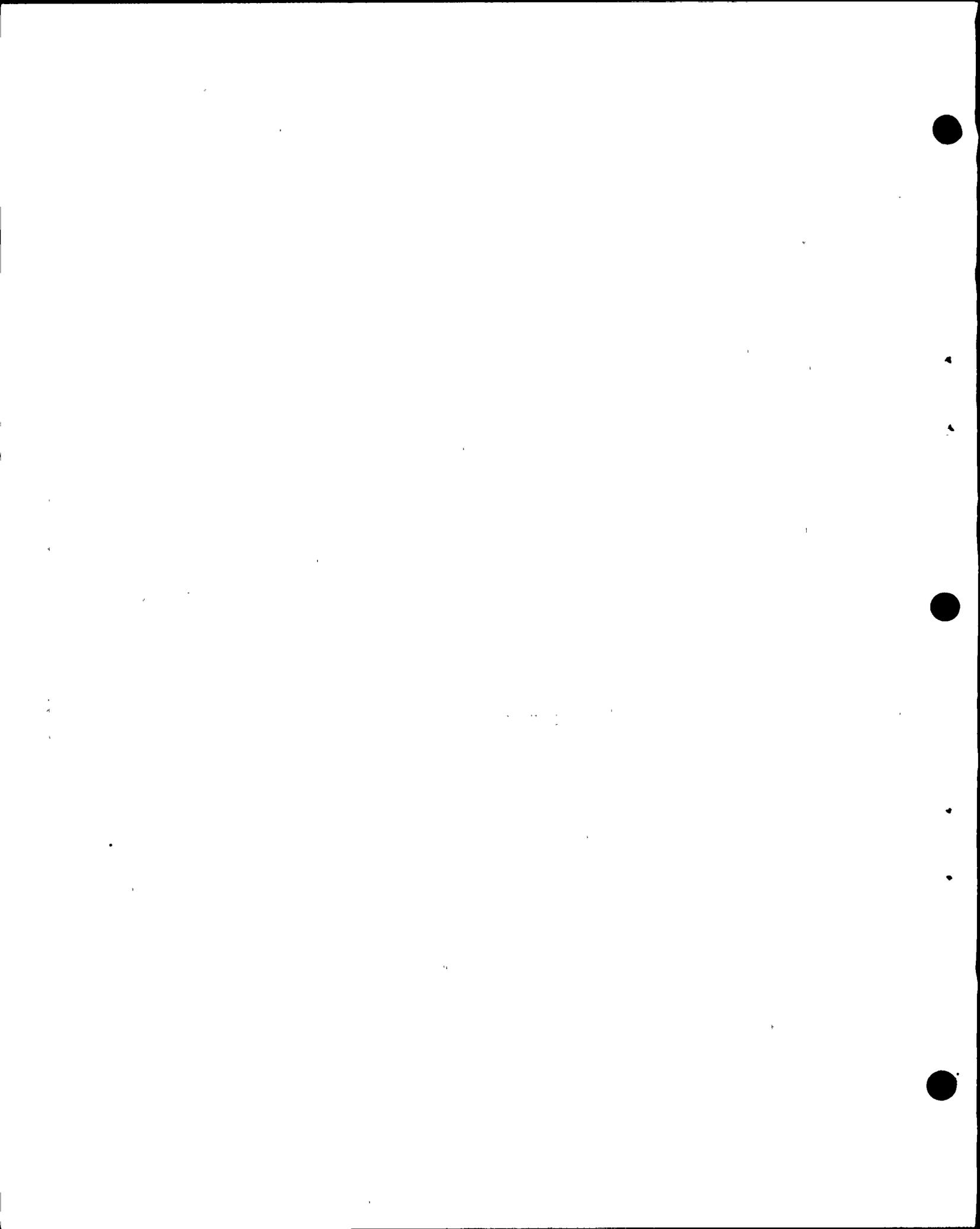
11 The testimony lists additional modifications,
12 but I will not summarize those as they were less significant
13 than those I've cited.

14 The mathematical models of the building, revised
15 to incorporate the structural modification, were re-analyzed
16 for the Hosgri motions, and the results of that re-analysis
17 showed that the building met the specified acceptance criteria.

18 There is a table appended to the testimony that
19 summarizes some of the stress results.

20 The turbine pedestal, which is a massive structure
21 located within the turbine building, it shares a common founda-
22 tion mat with the turbine building and supports the turbine
23 generator set, was analyzed for the same horizontal and vertical
24 response spectra as the turbine building itself.

25 As a result of that analysis, modifications were



wrb/agb4

1
2 determined to be necessary to prevent the turbine pedestal
3 from possibly impacting the surrounding building and to main-
4 tain stress levels within the acceptance criteria.

5 I conclude the testimony with the statement that
6 the turbine building, with the substantial modifications
7 discussed, is capable of withstanding the Hosgri earthquake.

8 That concludes my summary.

9 MRS. BOWERS: Mr. Norton, before we proceed, I'm
10 not clear on the identification of one of the witnesses.

11 MR. NORTON: It is L-1.

12 MRS. BOWERS: Thank you.

13 MR. NORTON: At this time, we would ask that the
14 testimony regarding the turbine building be placed in the
15 record as though read.

16 MRS. BOWERS: Mr. Kristovich?

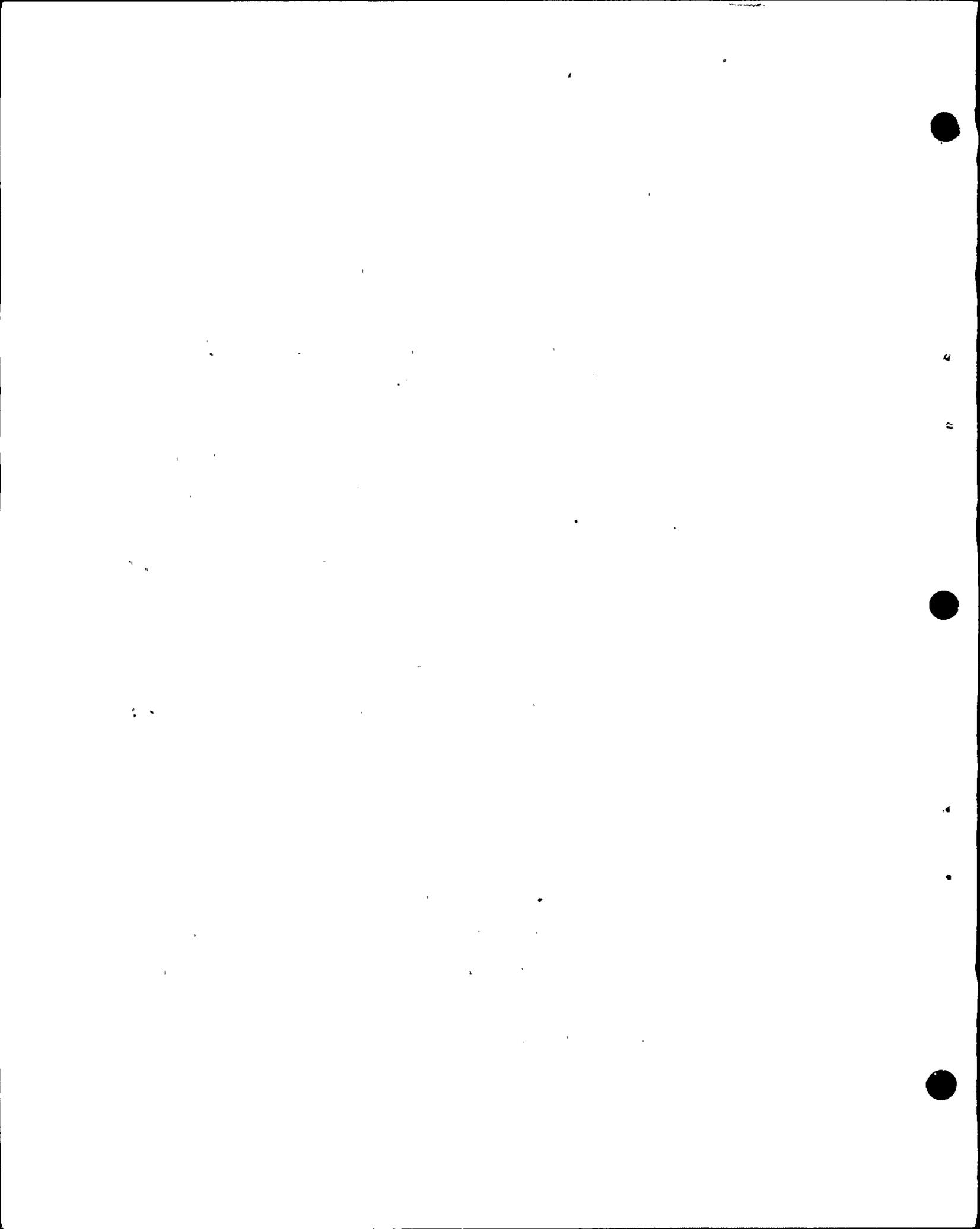
17 MR. KRISTOVICH: No objection.

18 MRS. BOWERS: The Staff?

19 MR. KETCHEN: No objection.

20 MRS. BOWERS: Well, the testimony will be physically
21 inserted in the transcript as if read.

22 (The document follows:)
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1 TESTIMONY OF
2 VINCENT J. GHIO
3 AND
4 DAVID LANG
5 ON BEHALF OF
6 PACIFIC GAS AND ELECTRIC COMPANY
7 DECEMBER 4, 1978
8 DOCKET NOS. 50-275, 50-323

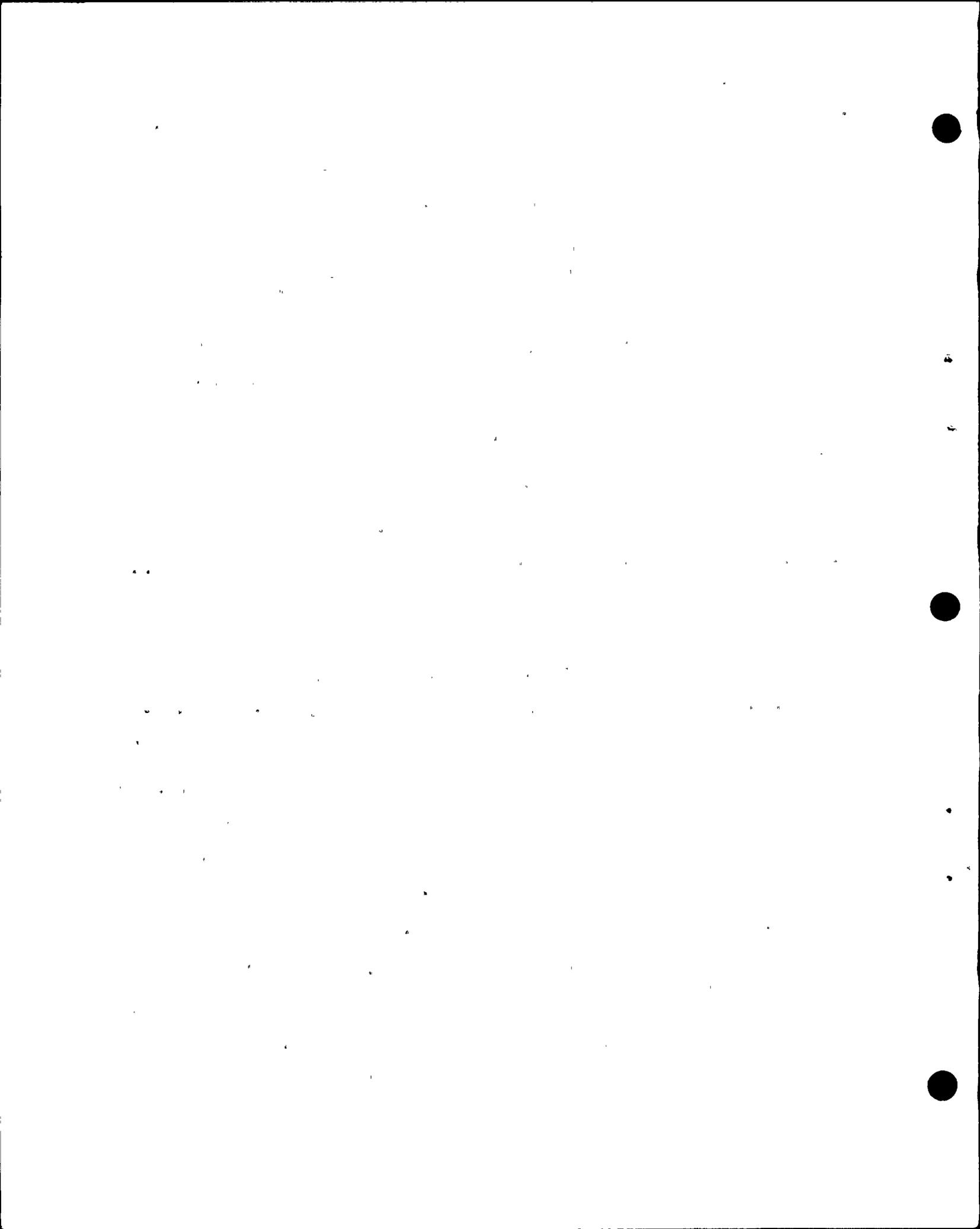
9 HOSGRI ANALYSIS AND EVALUATION OF THE TURBINE BUILDING

10 The horizontal seismic inputs for the Turbine
11 Building corresponded to the Blume and Newmark response
12 spectra. These spectra were adjusted for spatial averaging
13 of accelerations to make them structure-specific. The
14 seismic input for the building in the vertical direction
15 corresponded to the Newmark free-field spectrum, scaled by
16 two-thirds. This spectrum exceeds the corresponding Blume
17 spectrum virtually everywhere.

18 Damping of 7% was used in the Hosgri analysis in
19 accordance with Regulatory Guide 1.61. The concrete strength
20 corresponded to the average cylinder strength of samples
21 used in the construction of the structure. The average test
22 value yield strength was used for the structural steel and
23 concrete reinforcing steel in the building.

24 Due to the configuration of the building and the
25 absence of rigid diaphragms, accidental torsion was considered
26 by a 10% increase in all responses resulting from the trans-
lational analyses.

The north-south, east-west and vertical analyses
of the Turbine Building were decoupled to facilitate the

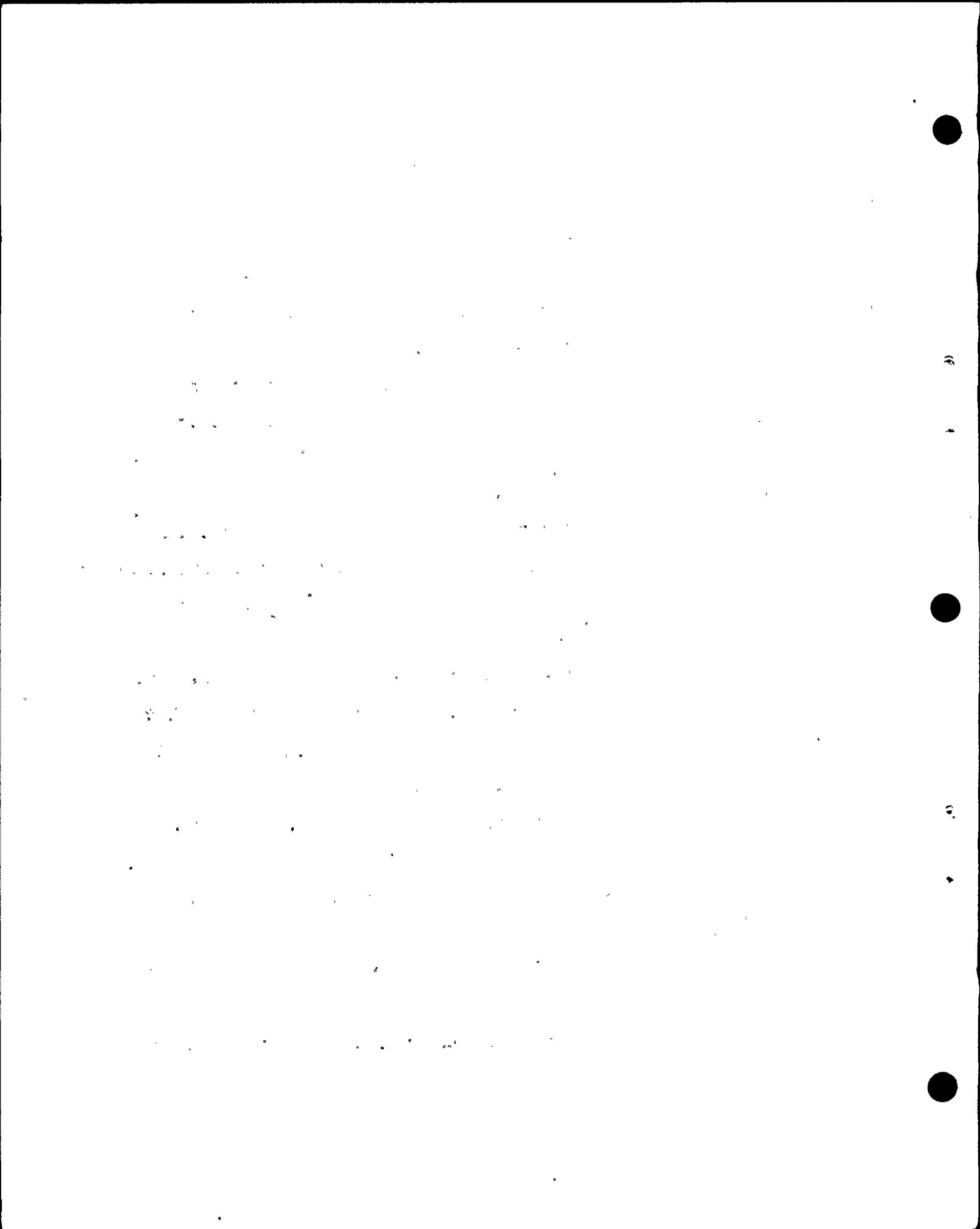


1 analysis of the structurally complex building. For the
2 analysis resulting from north-south earthquake motions,
3 two-dimensional models of the east and west walls of the
4 building were developed and analyzed. For the east-west
5 analysis, a comprehensive three-dimensional model considering
6 all major elements of the east-west lateral force resisting
7 system was developed. Several simplified mathematical
8 models were developed for analysis of the building in the
9 vertical direction.

10 The results of the analyses of the unmodified
11 building indicated that the structure did not perform satis-
12 factorily under the postulated 7.5M Hosgri seismic motions.
13 In particular, the floors at elevations 119 and 104 were
14 subjected to high lateral accelerations. In addition, the
15 large east-west displacements caused significant out-of-plane
16 bending of shear walls along the east and west sides of the
17 building.

18 The following modifications to the existing struc-
19 tural system were found to be necessary in order to resist
20 the Hosgri earthquake within the acceptance criteria:

21 A. New exterior concrete buttresses with hori-
22 zontal diaphragms and a new east-west interior concrete
23 shear wall below elevation 119.00 have been constructed.
24 These walls are anchored against overturning by a combination
25 of ties to the existing building, drilled piers or caissons,
26 and/or grouted rock bolts. Shear forces are transferred to



1 the soil by a combination of shear keys and ties to the
2 existing foundations..

3 B. The existing north-south and east-west concrete
4 shear walls below elevation 104 were strengthened. This has
5 been accomplished by thickening the existing walls and
6 adding rock bolts to resist overturning forces.

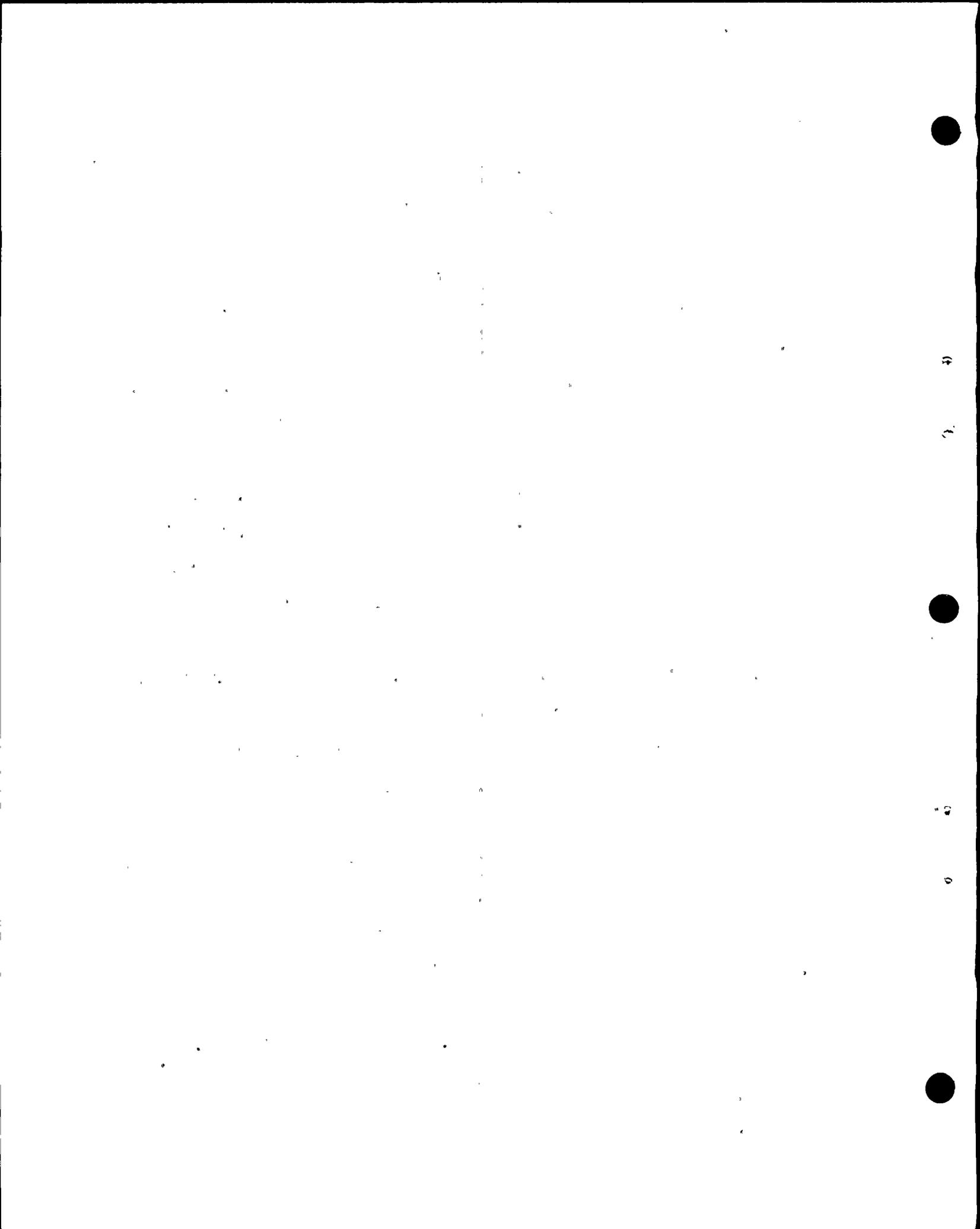
7 C. The existing floor grating at elevation 104
8 and 119 have been substantially replaced by steel plate.
9 The plate is welded to the existing floor framing to withstand
10 the larger seismic forces.

11 D. Floor framing at elevations 104 and 119 have
12 been strengthened. Selected connections have been strengthened
13 and in some cases additional plates have been added to
14 increase member capacities.

15 E. New concrete shear walls along the east and
16 west sides of the building between elevations 104 and 140
17 have been added. These walls provide additional lateral
18 stiffness in the north-south directions.

19 F. New vertical steel bracing has been added
20 along the east and west sides of the building between eleva-
21 tions 140 and the roof to provide increased north-south
22 stiffness.

23 G. New horizontal steel bracing has been added
24 in the lower chord of the roof trusses of the building.
25 This modification serves to better distribute the seismic
26 forces at roof level.



1 H. The connections for the vertical and horizontal
2 bracing member joints have been strengthened by adding bolts
3 to develop the full capacity of the bracing member.

4 I. The horizontal crane rail support has been
5 strengthened to resist the higher crane forces resulting
6 from the Hosgri motions.

7 J. The exterior plate-girder columns have been
8 strengthened to resist the higher axial loads and bending
9 moments.

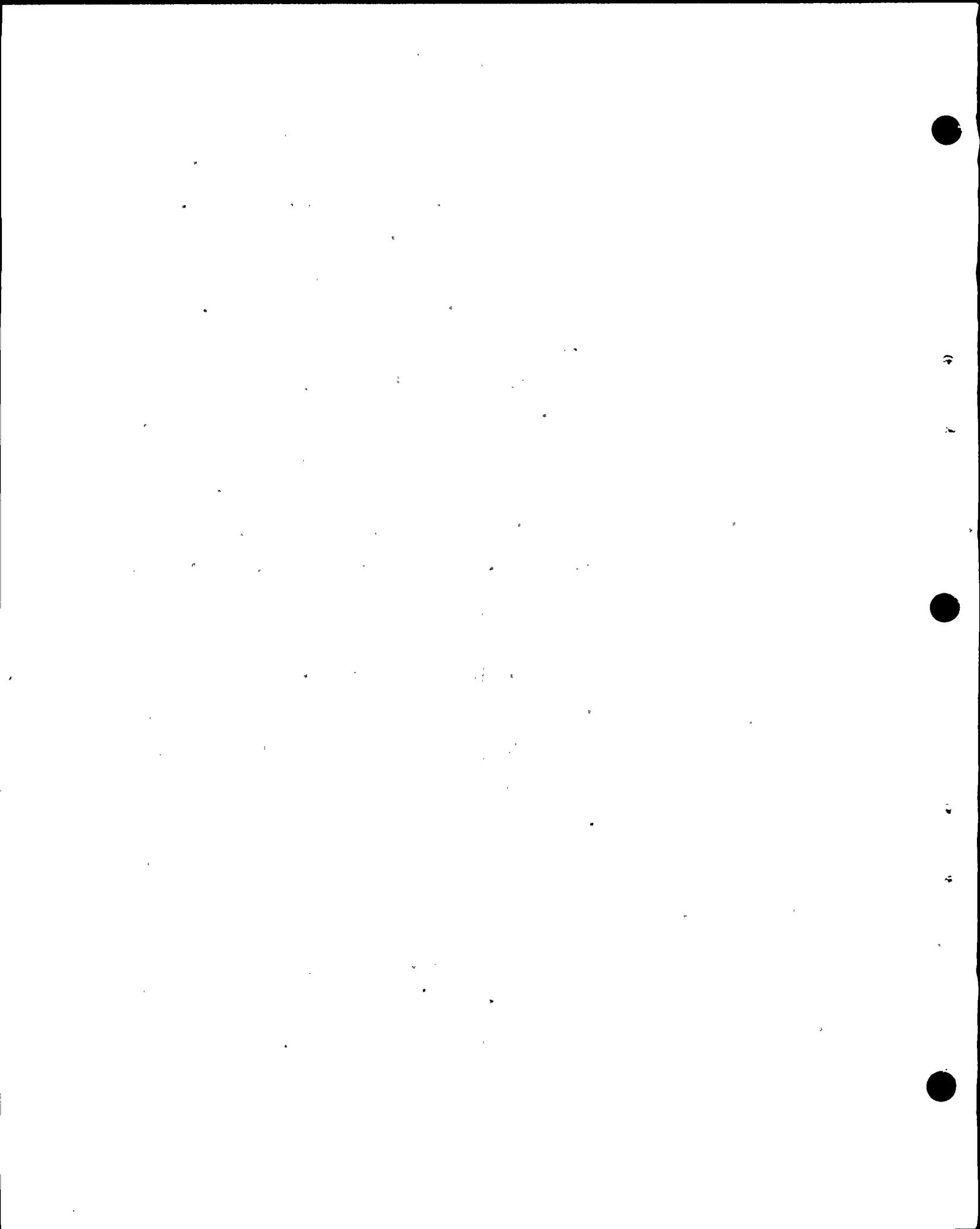
10 K. Some floor beams have been strengthened to
11 accommodate the Hosgri related equipment or piping loads.

12 L. Additional columns have been installed to
13 support interior concrete block walls separating the Design
14 Class I switchgear.

15 The significant modifications are illustrated in
16 Figure(s) 1 through 6.

17 The mathematical models of the building, revised
18 to incorporate the structural modifications, were re-analyzed
19 for the Hosgri motions. The results of this re-analysis
20 showed that some vertical steel bracing members on the north
21 and south ends of the building required additional analysis
22 to determine the ductility requirements of those members.
23 The results were within the ductility limits in the criteria.

24 The remaining elements were within allowable
25 stresses. Representative elements, comparing computed and
26 allowable stresses, are shown in Table 1.

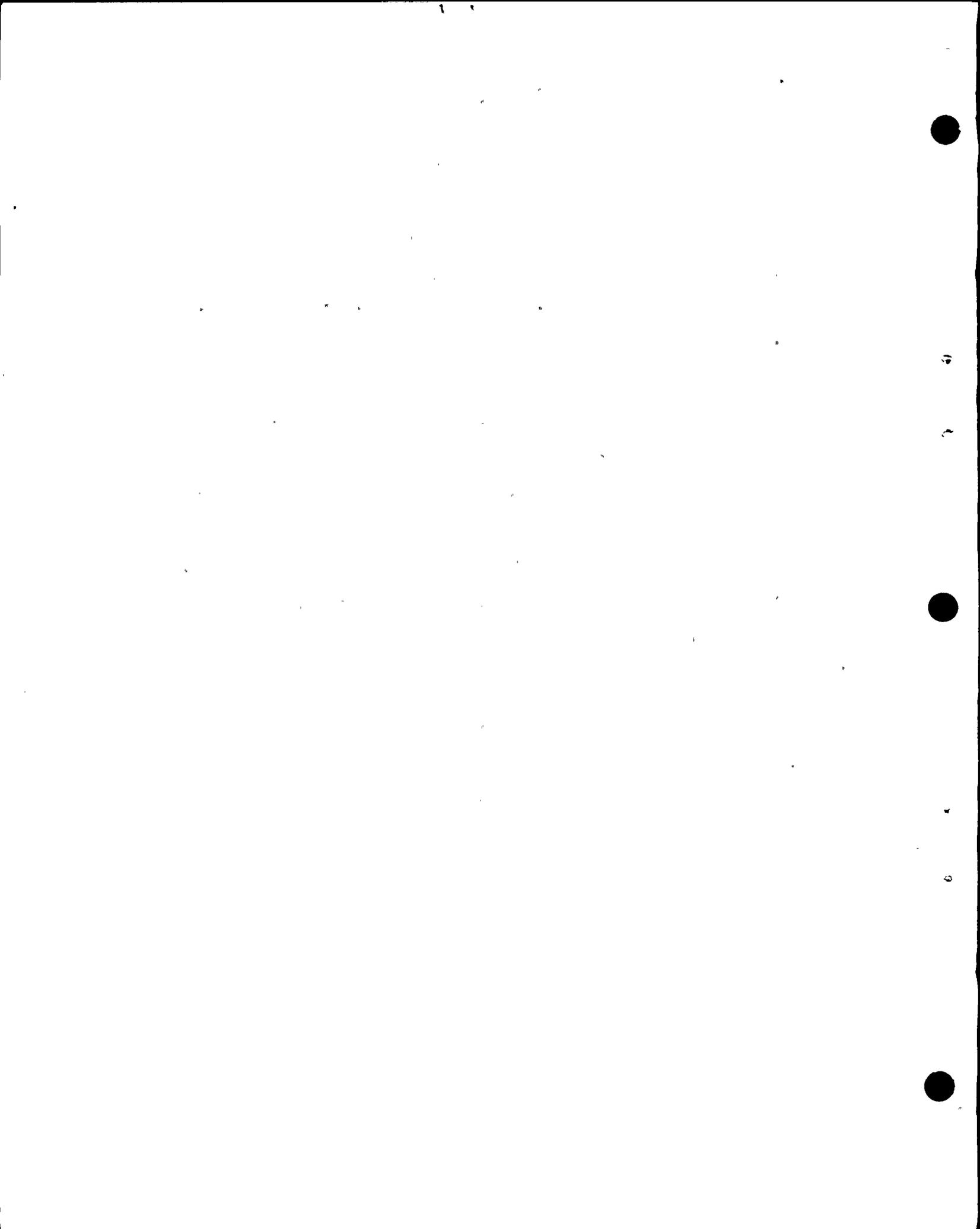


1 The Turbine Pedestal, sharing a common foundation
2 with and located within the Turbine Building, was analyzed
3 for the same horizontal and vertical response spectra as the
4 Turbine Building itself. Damping equal to 7% was used in
5 the analysis in accordance with Regulatory Guide 1.61.
6 Based on a number of tests, the actual in place strength of
7 the concrete was determined to be 6,000 psi. This value was
8 used only for the determination of shear and torsion capacities.
9 All response analyses used the strength determined at the
10 time of construction. A yield strength corresponding to the
11 average test value was used for the reinforcing steel.

12 A three-dimensional finite element model was used
13 in the analysis. In addition to seismic and dead load,
14 loads associated with normal operating torque and short
15 circuit torque were considered in the analysis.

16 A review of the Turbine Pedestal members when sub-
17 jected to the Hosgri motions revealed two structural problems.
18 First, the maximum combined displacements of the Turbine
19 Pedestal and the Turbine Building in the east-west direction
20 at elevation 140 exceeded the existing structural gap. In
21 order to prevent any possible impact, the gap was increased
22 to exceed the combined displacements.

23 In addition, the existence of axial tension due to
24 the east-west earthquake combined with high shear and torsional
25 stresses resulted in three sets of Turbine Pedestal columns
26 exceeding estimated capacities. In order to eliminate the



1 seismic-induced tensions, a system was designed to post-
2 tension the columns. This is accomplished by drilling holes
3 in the piers, inserting high-strength cables injecting grout
4 to provide bond, and post-tensioning the columns up to a
5 maximum of 200 psi. The post-tensioning bars are anchored
6 in the foundation or the rock below the foundation, as
7 required. With the elimination of the axial tension, the
8 allowable stresses for the pedestal members would not be
9 exceeded and together with the gap enlargement, possible
10 impact between the Turbine Building and Turbine Pedestal is
11 prevented.

12 In conclusion the Turbine Building, with the
13 substantial modifications discussed above, is capable of
14 withstanding the Hosgri earthquake.

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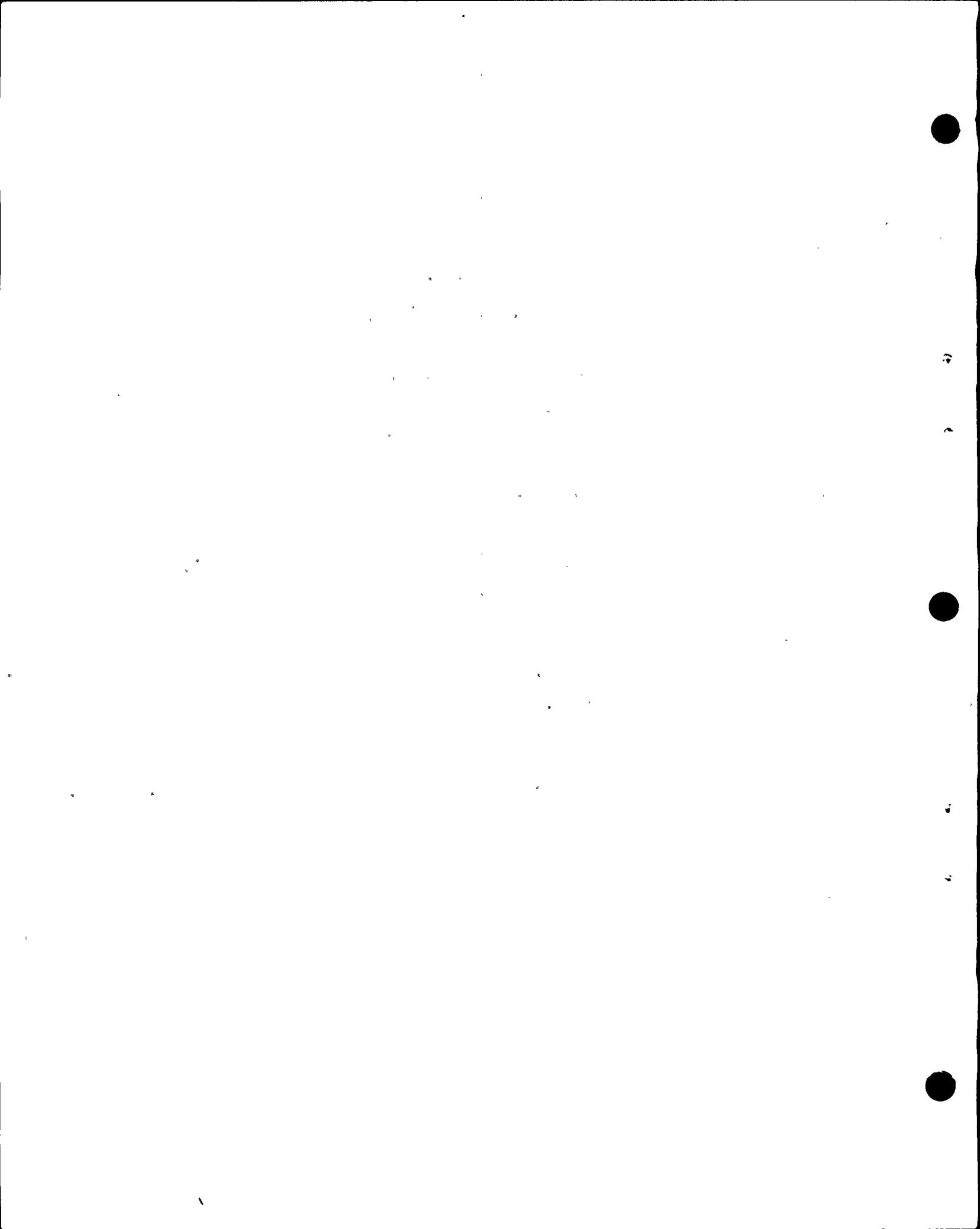
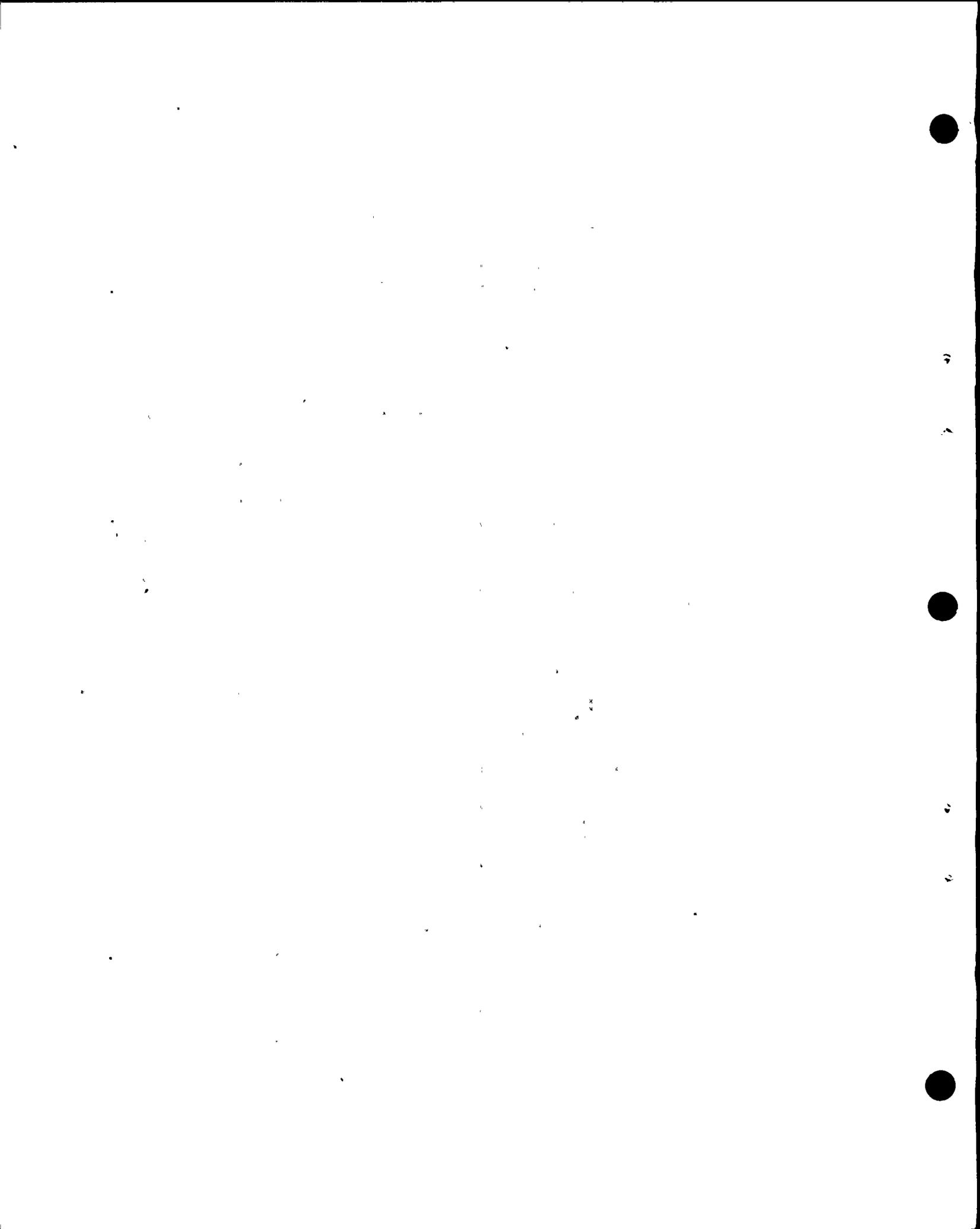
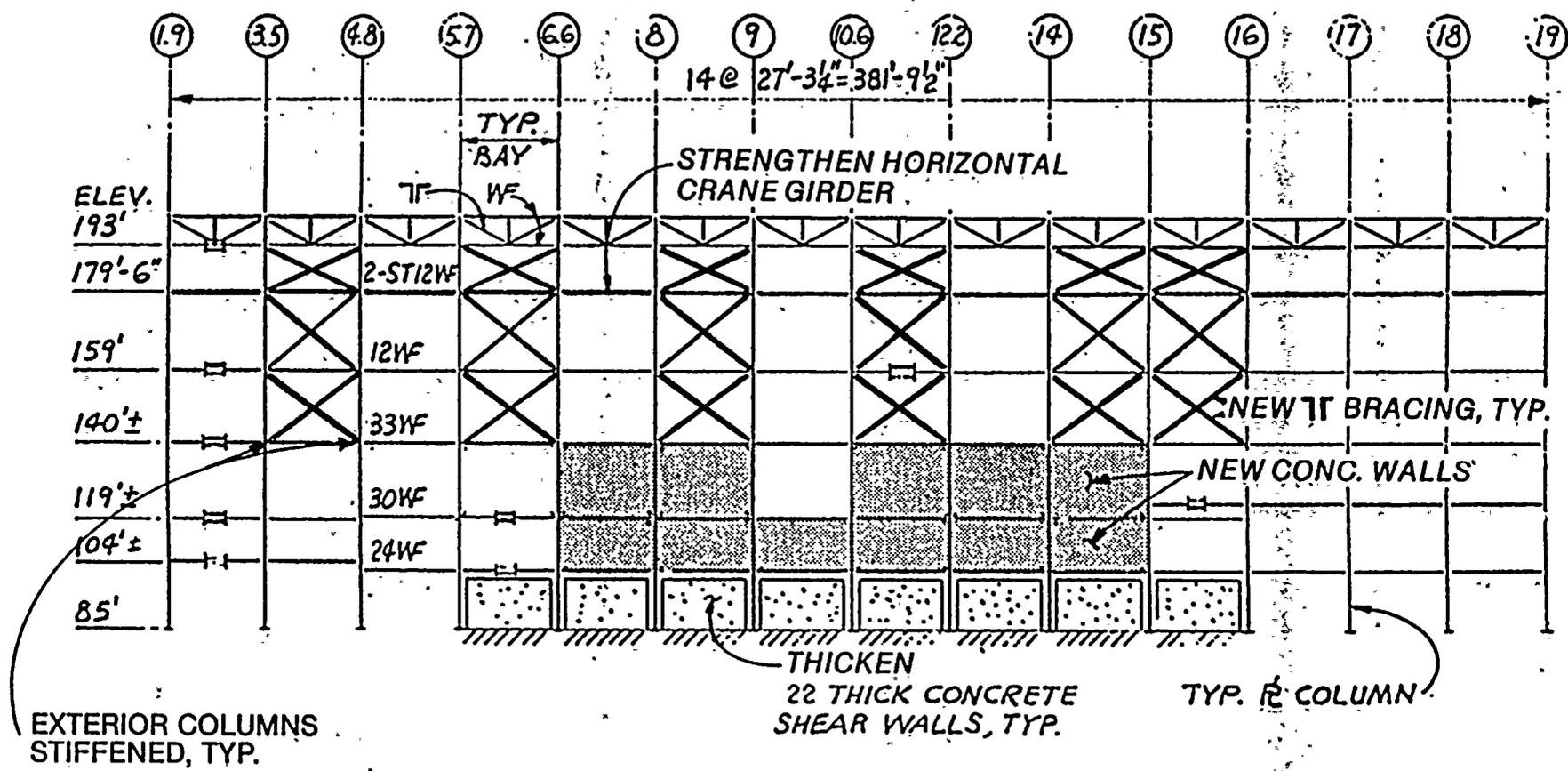


TABLE 1
TURBINE BUILDING
CRITICAL SHEAR ELEMENTS

Shear Element	Critical Stress Item	Maximum Stress or Load	Allowable Stress or Load
Concrete Shear Walls	Shear Stress, v Reinforcing Stress, f_s	360 psi 50.8 ksi	372 psi 51.4 ksi
Concrete Buttresses	Shear Stress, v	202 psi	321 psi
Drilled Concrete Caissons	Compression Uplift	810 kips 570 kips	1,260 kips 1,000 kips
Vertical Steel Bracing (N/S)	Axial Stress, f_a	21.9 ksi	23.8 ksi
Steel Bent Columns	$\frac{P}{P_y} + \frac{M_x}{1.18M_{p_x}} + \frac{M_y}{1.18M_{p_y}}$	0.99	1.00
Concrete Floor Slab at Elevation 140 ft	Shear Stress, v Chord Stresses, f_s	365 psi 38.9 ksi	406 psi 44.0 ksi
Rock Bolts	Uplift	83 kips	84 kips

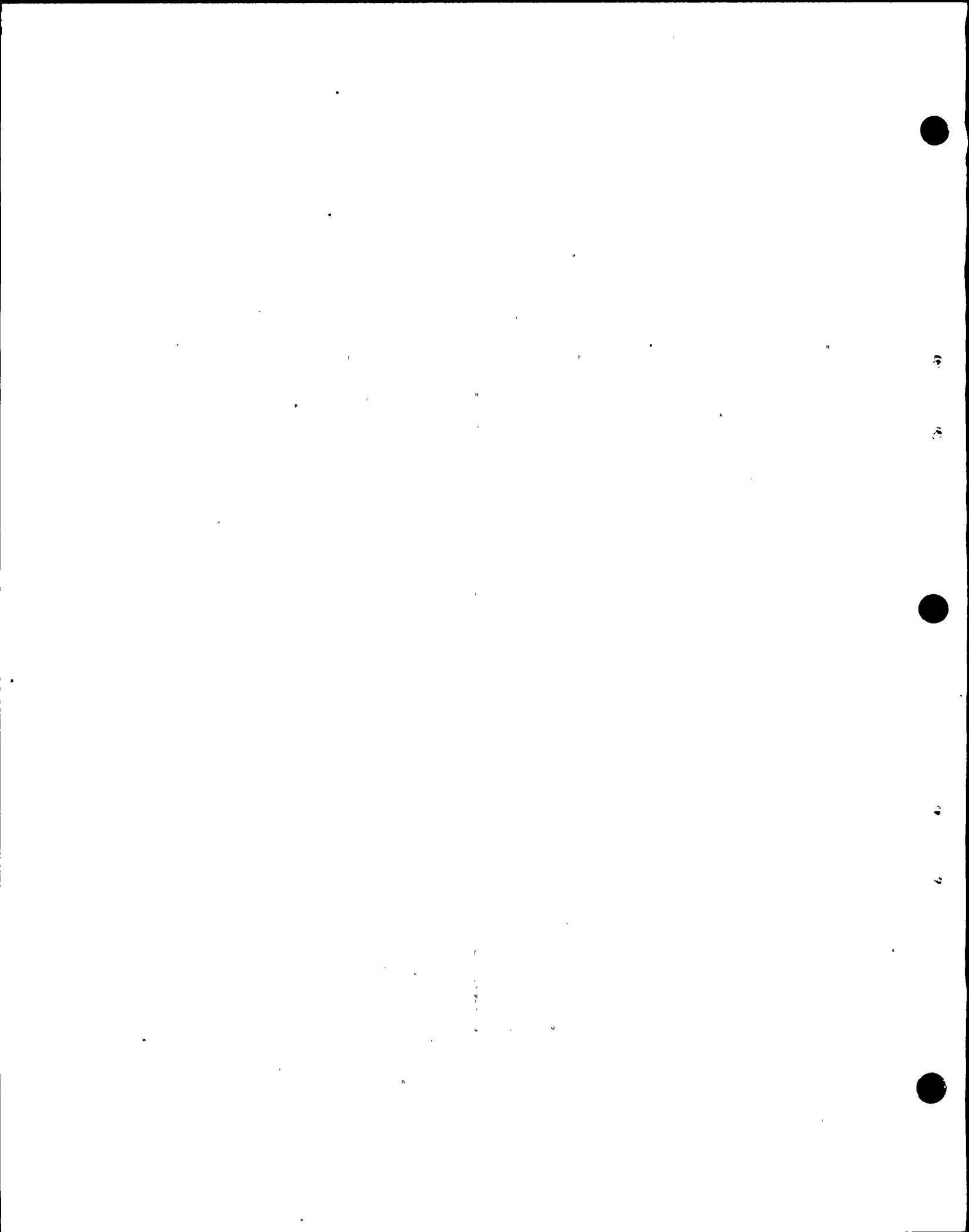




NOTE: EAST ELEVATION FRAMING SIMILAR

FIG. 1 — WEST ELEVATION FRAMING

NO SCALE



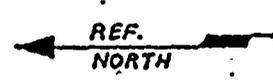
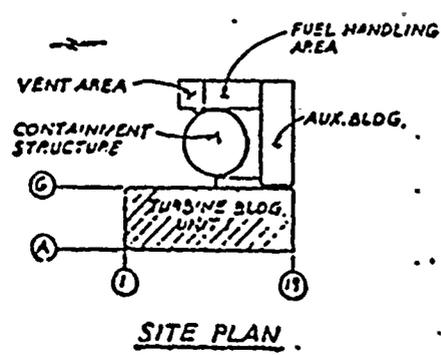
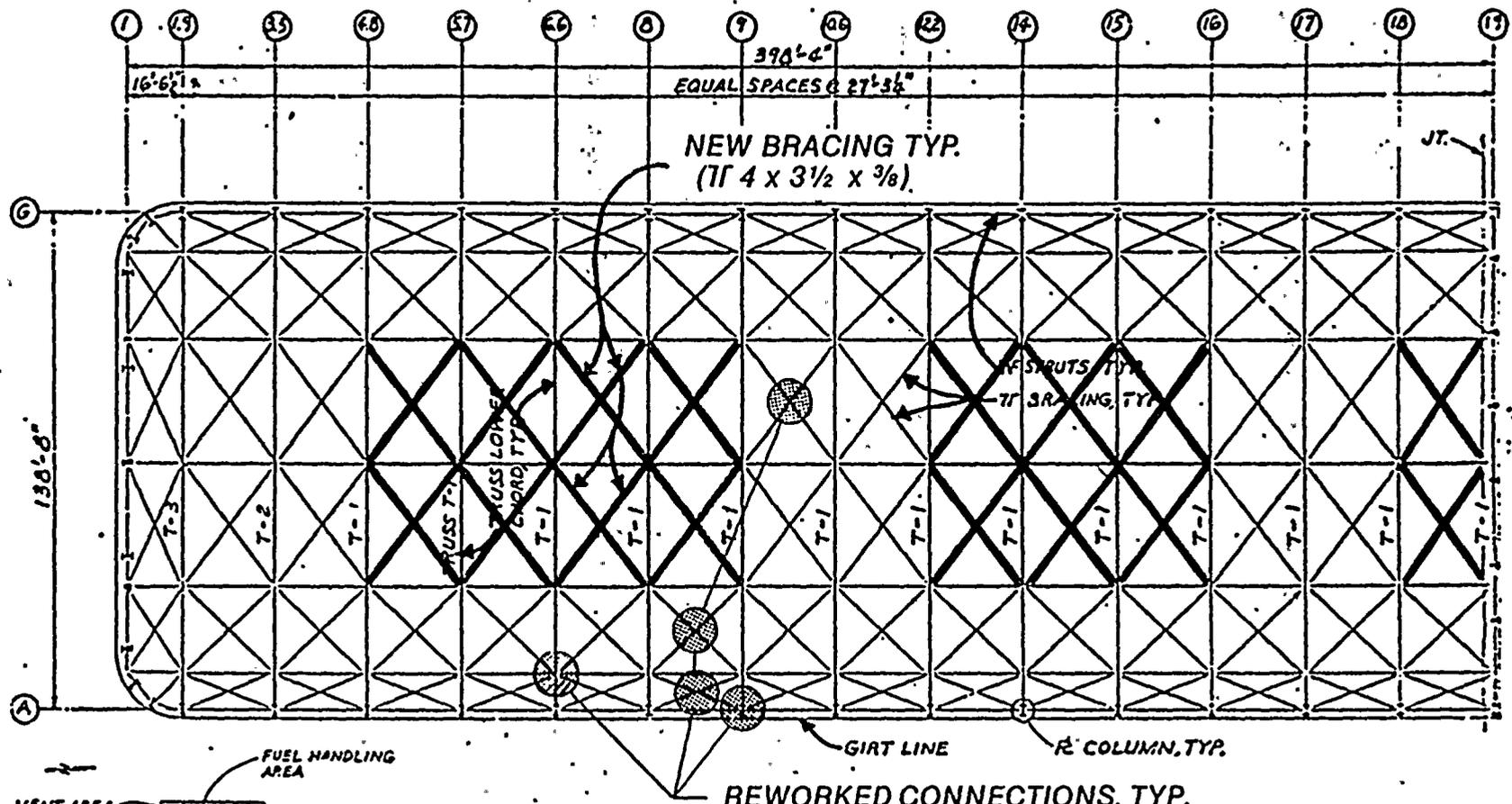
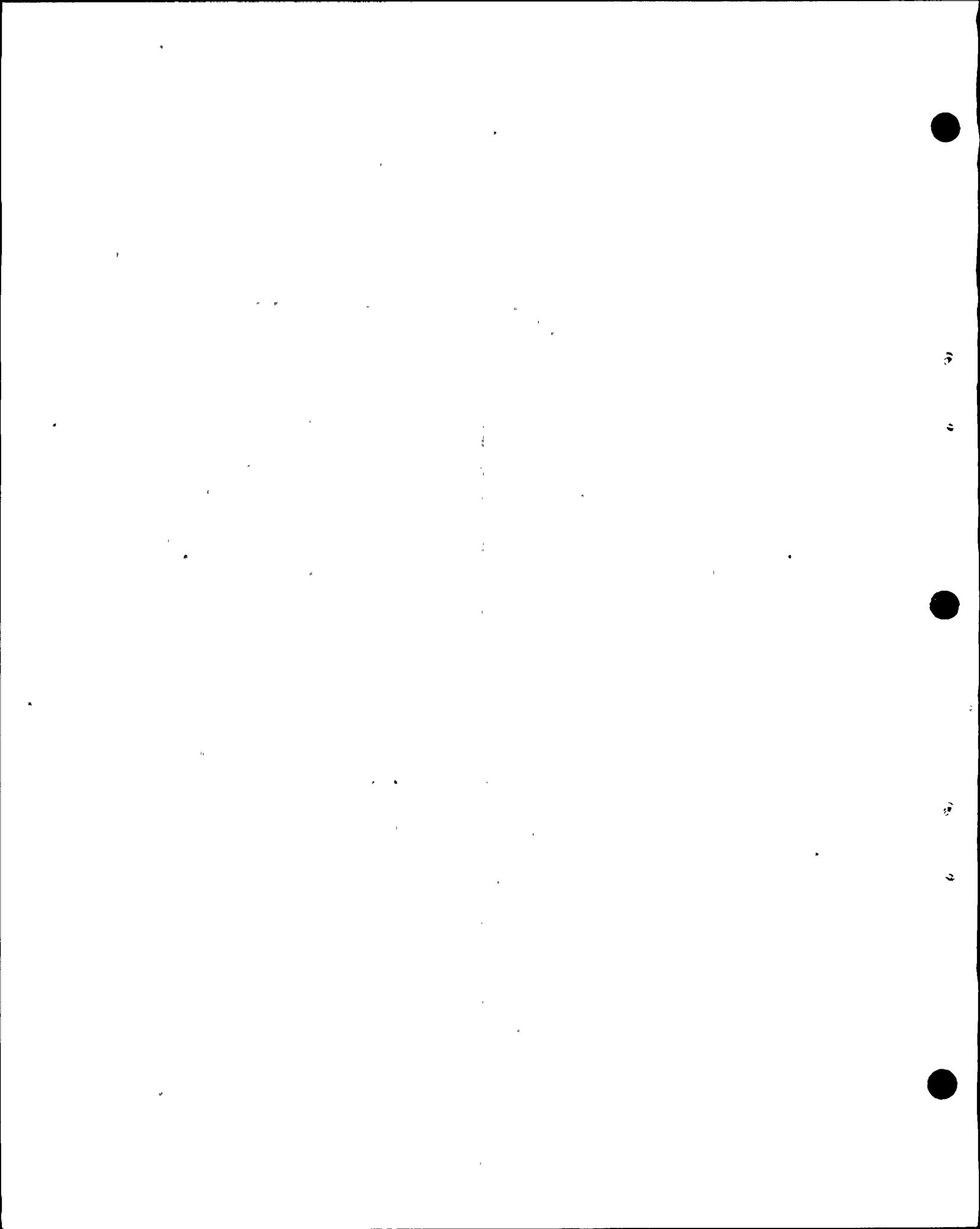


FIG. 2 PLAN AT LOWER CHORD OF ROOF TRUSSES



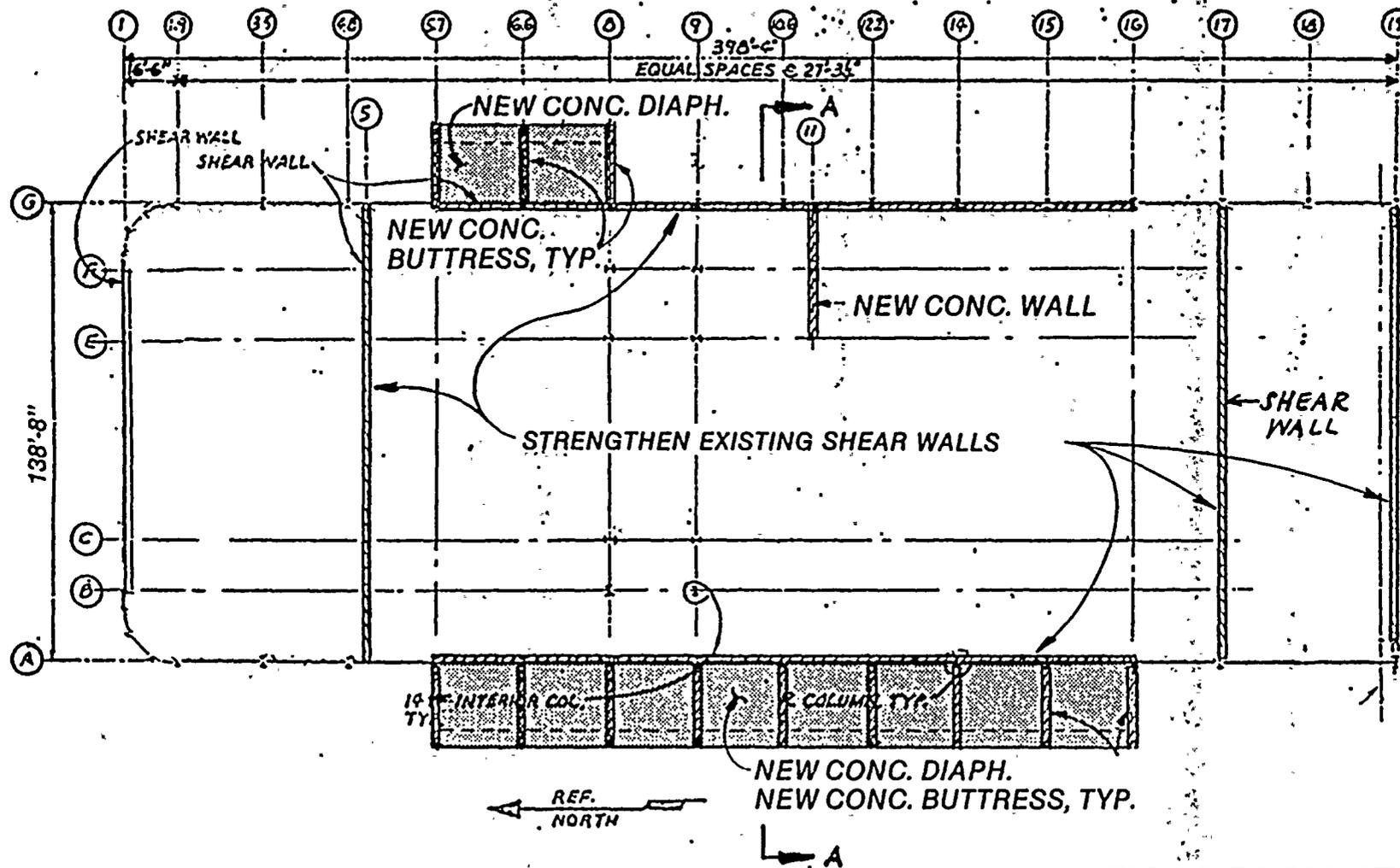


FIG. 3 PLAN AT ELEV. 85'-0"



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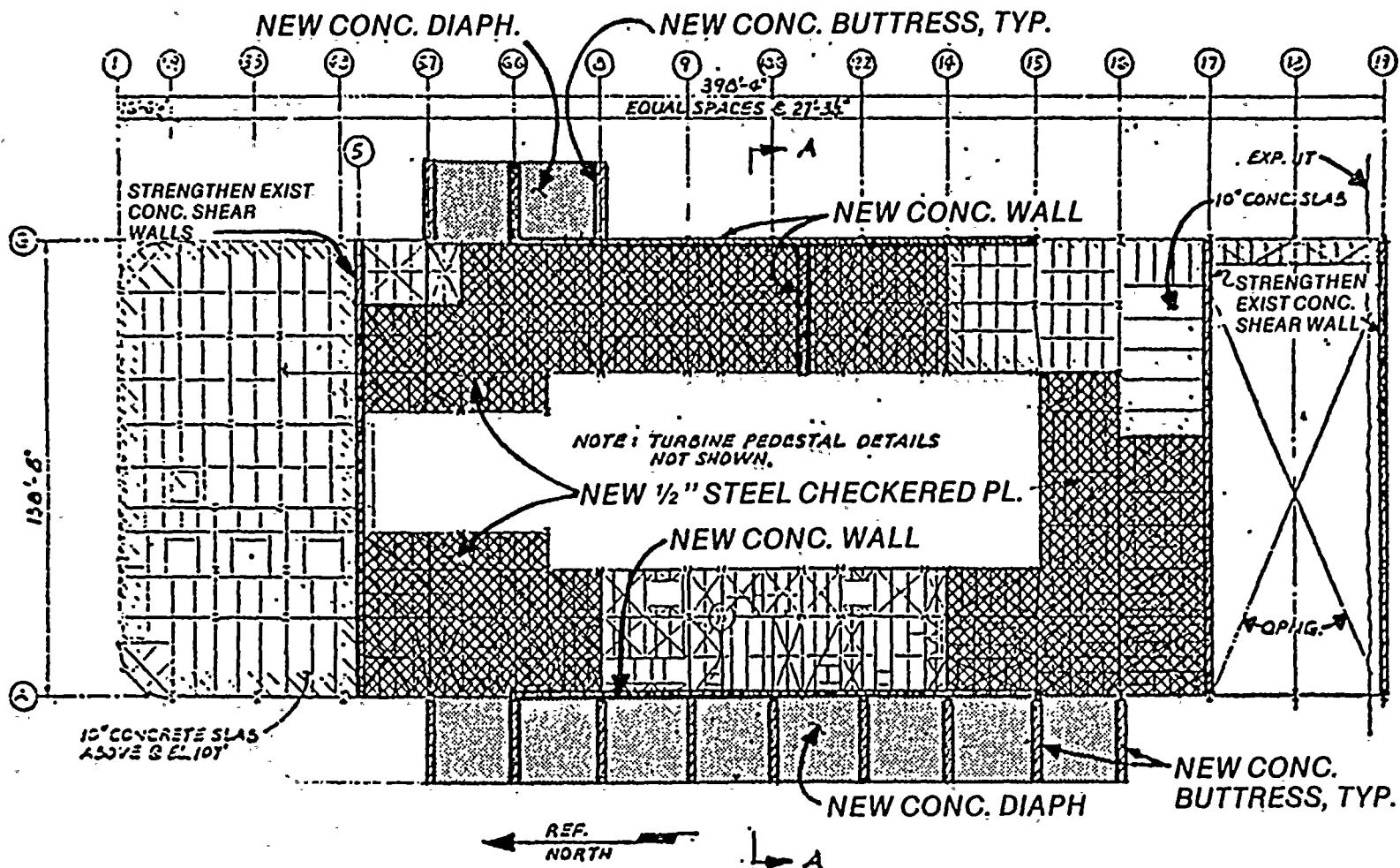
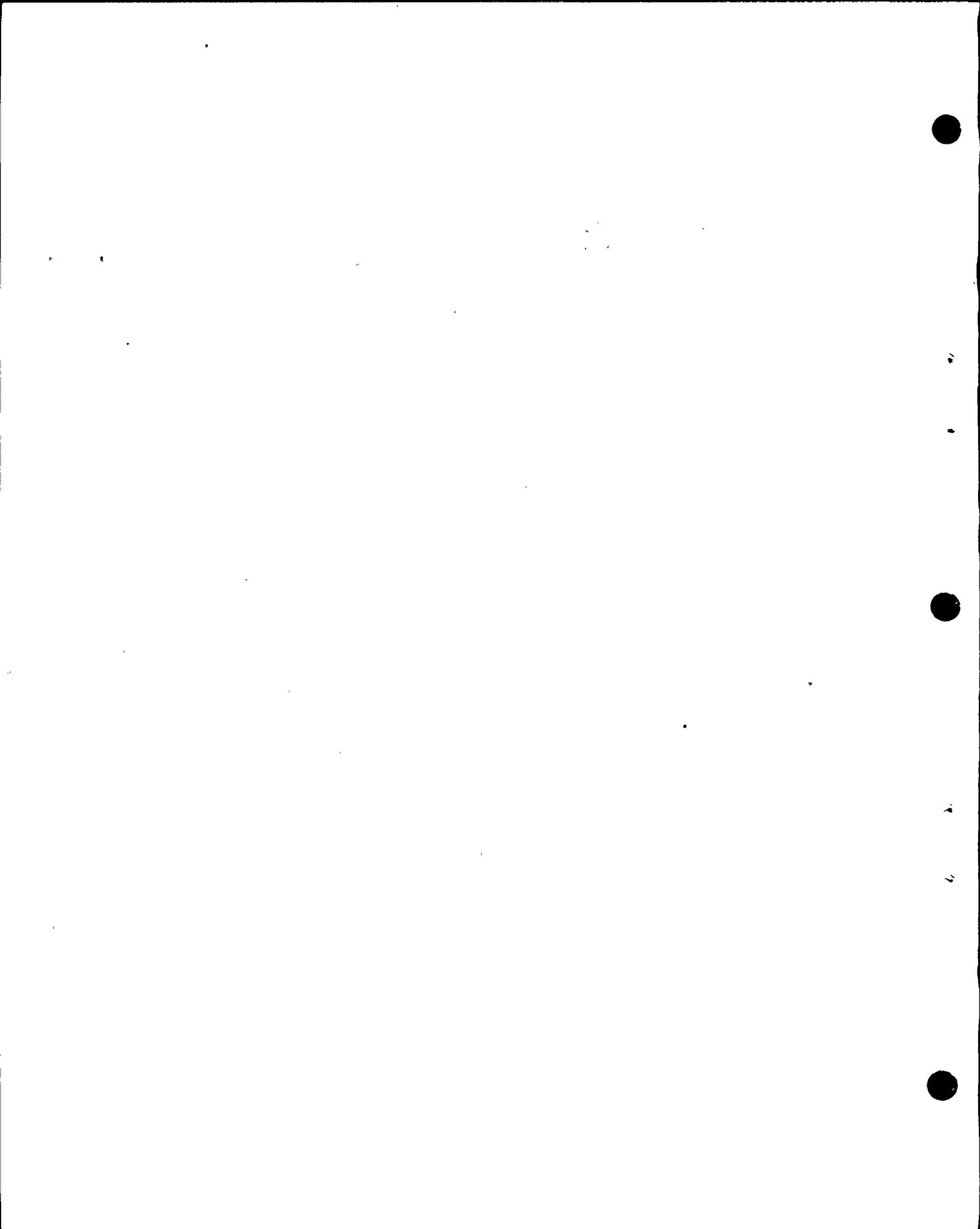
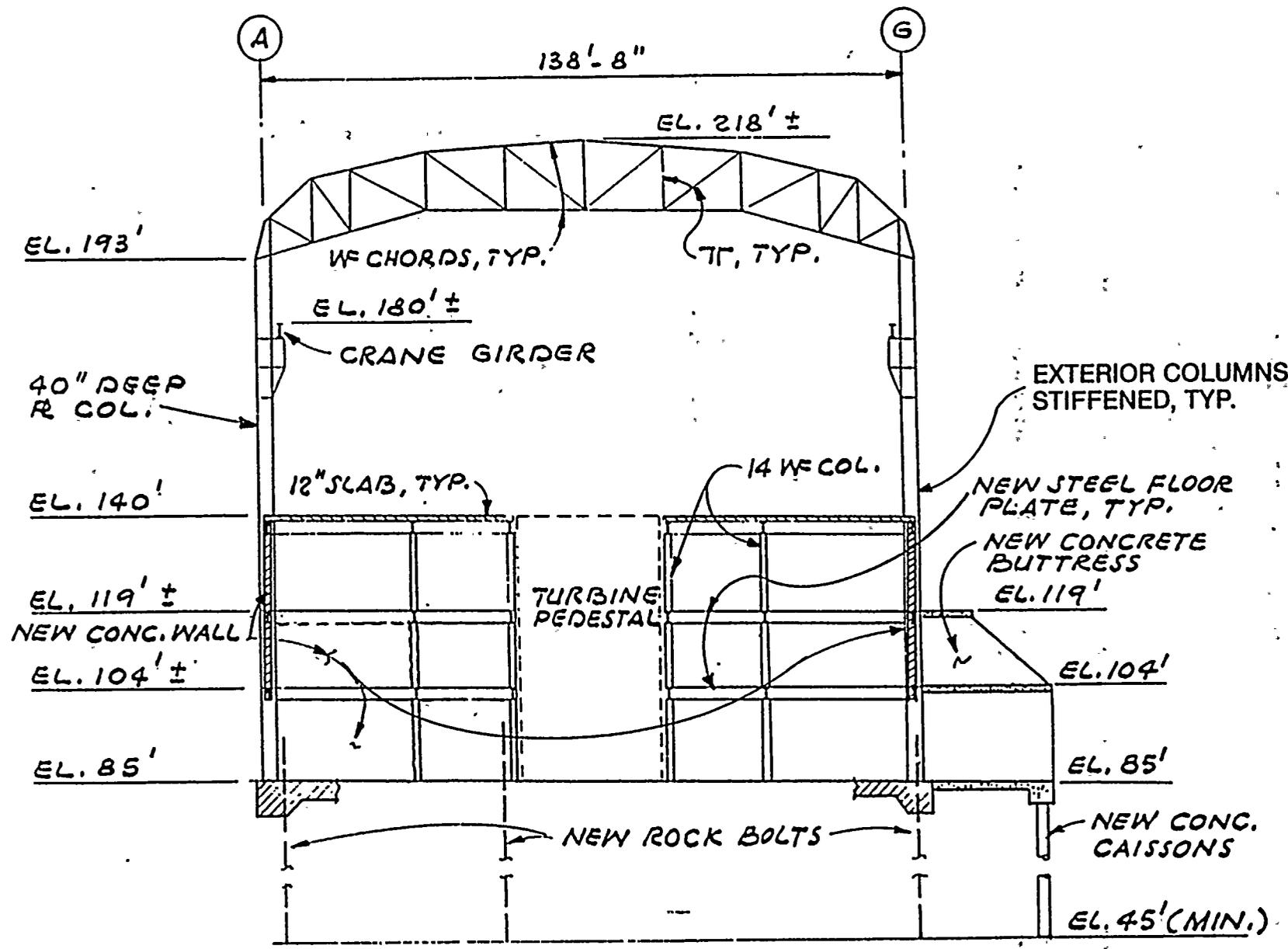


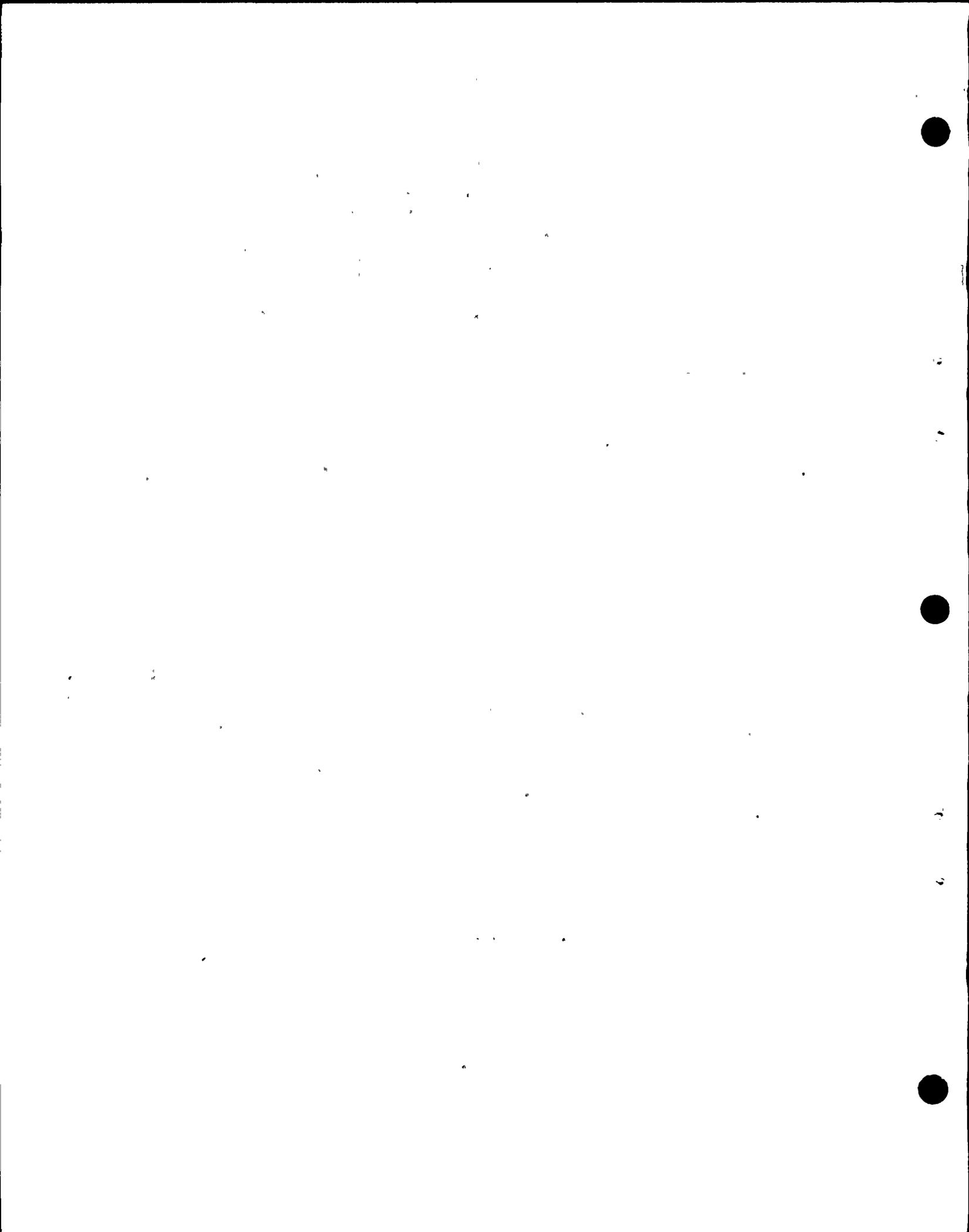
FIG. 4 PLAN AT
ELEV. 104'-0"
(ELEV. 119'-0" SIM.)

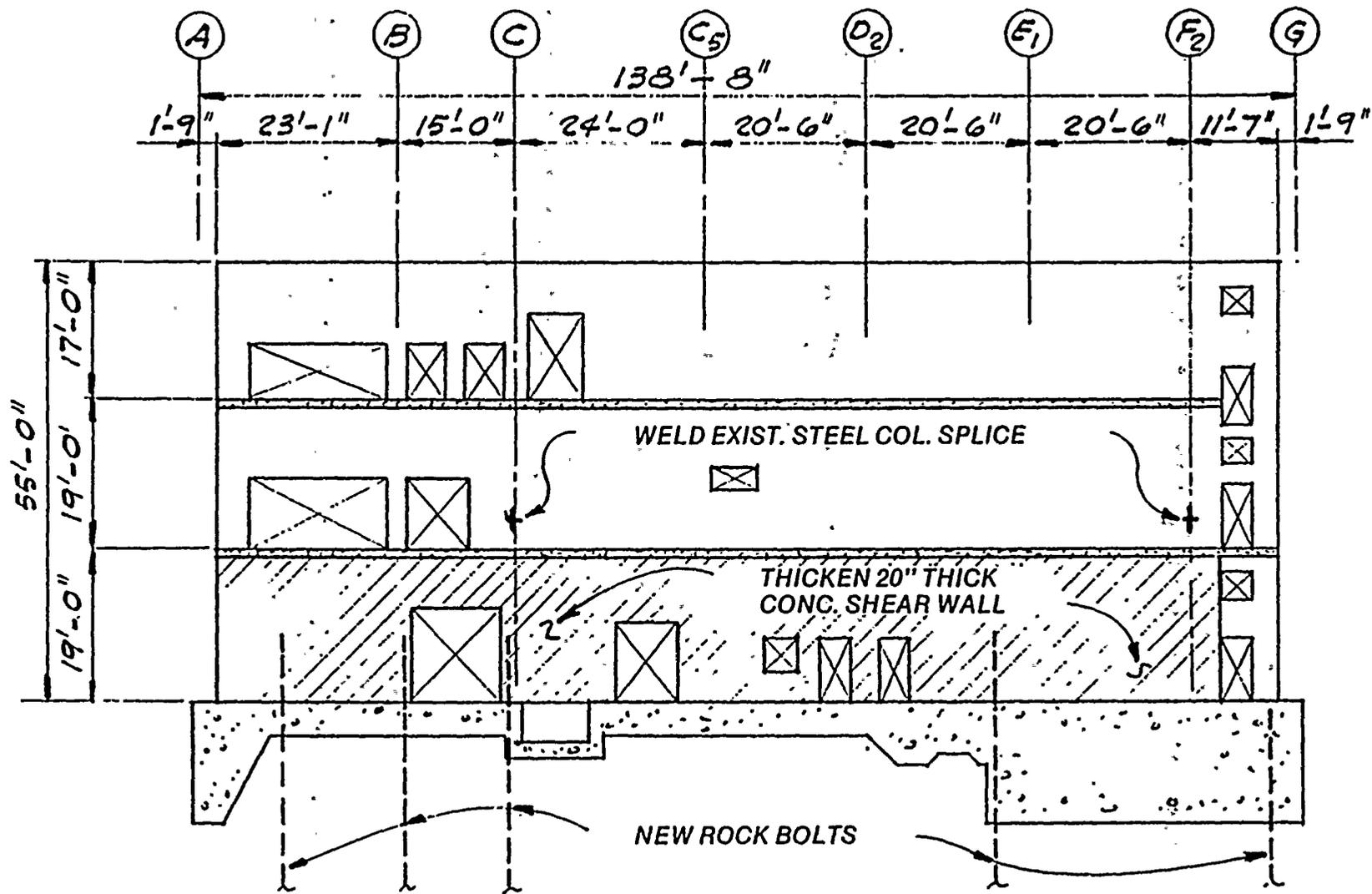




DIABLO CANYON
TURBINE BUILDING

FIGURE 5



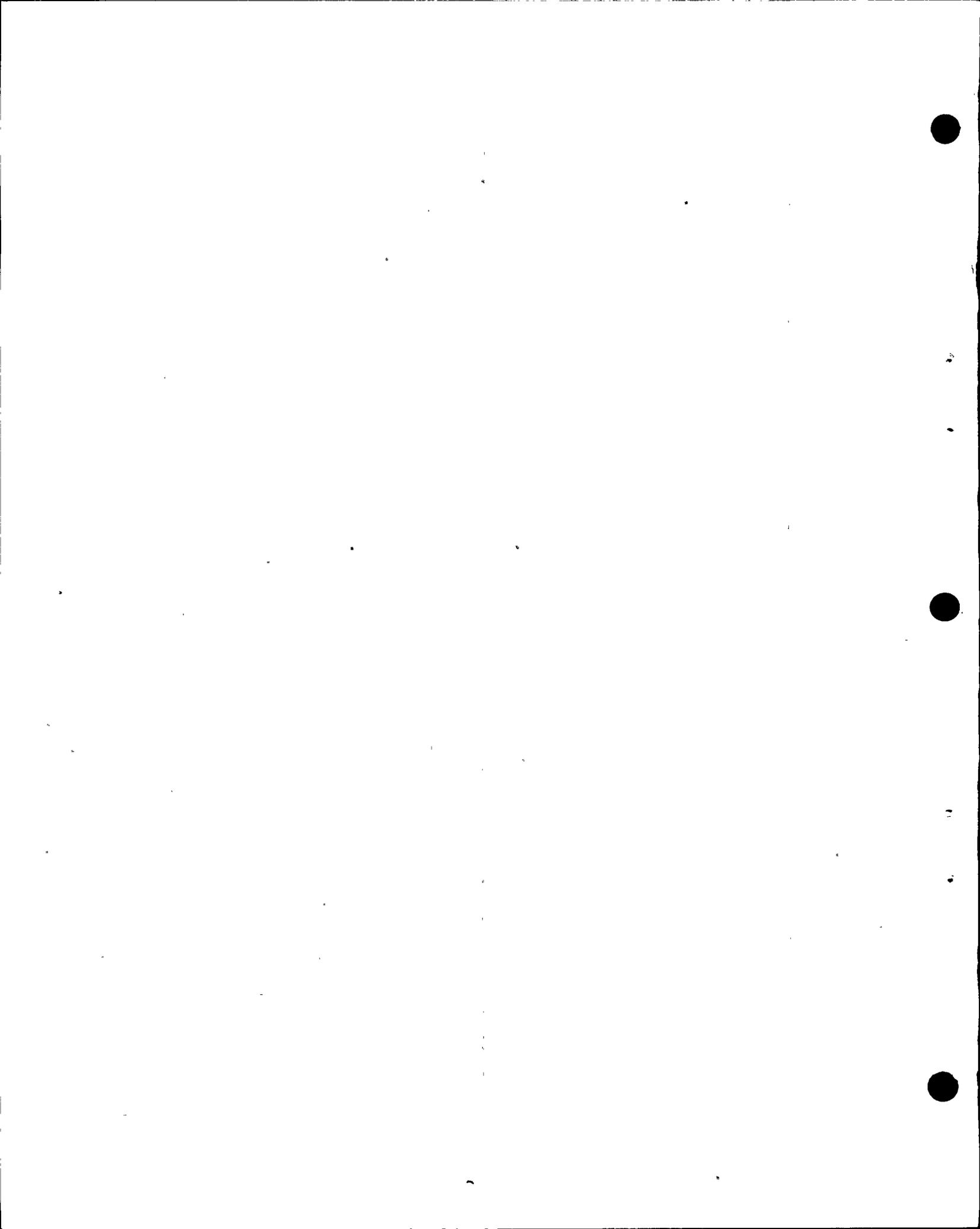


SHEAR WALL ELEVATION

LINE 19

(LINE 17 SIMILAR)

FIGURE 6



1 MR. NORTON: At this time, we would pass this
2 panel for cross-examination.

3 MRS. BOWERS: Maybe there's one piece of business
4 missing. Do all the panelists adopt this testimony?

5 MR. NORTON: Yes, that's true with all of these
6 panels. We can formally ask it, but they all worked on these
7 buildings and all worked on this testimony, that's true of all
8 of these panels regarding the structures and the equipment
9 and so on. It happens to be true of all of them.

10 MRS. BOWERS: All right.

11 Have you concluded the direct?

12 MR. NORTON: Yes.

13 MRS. BOWERS: Mr. Kristovich.

14 CROSS-EXAMINATION

15 BY MR. KRISTOVICH:

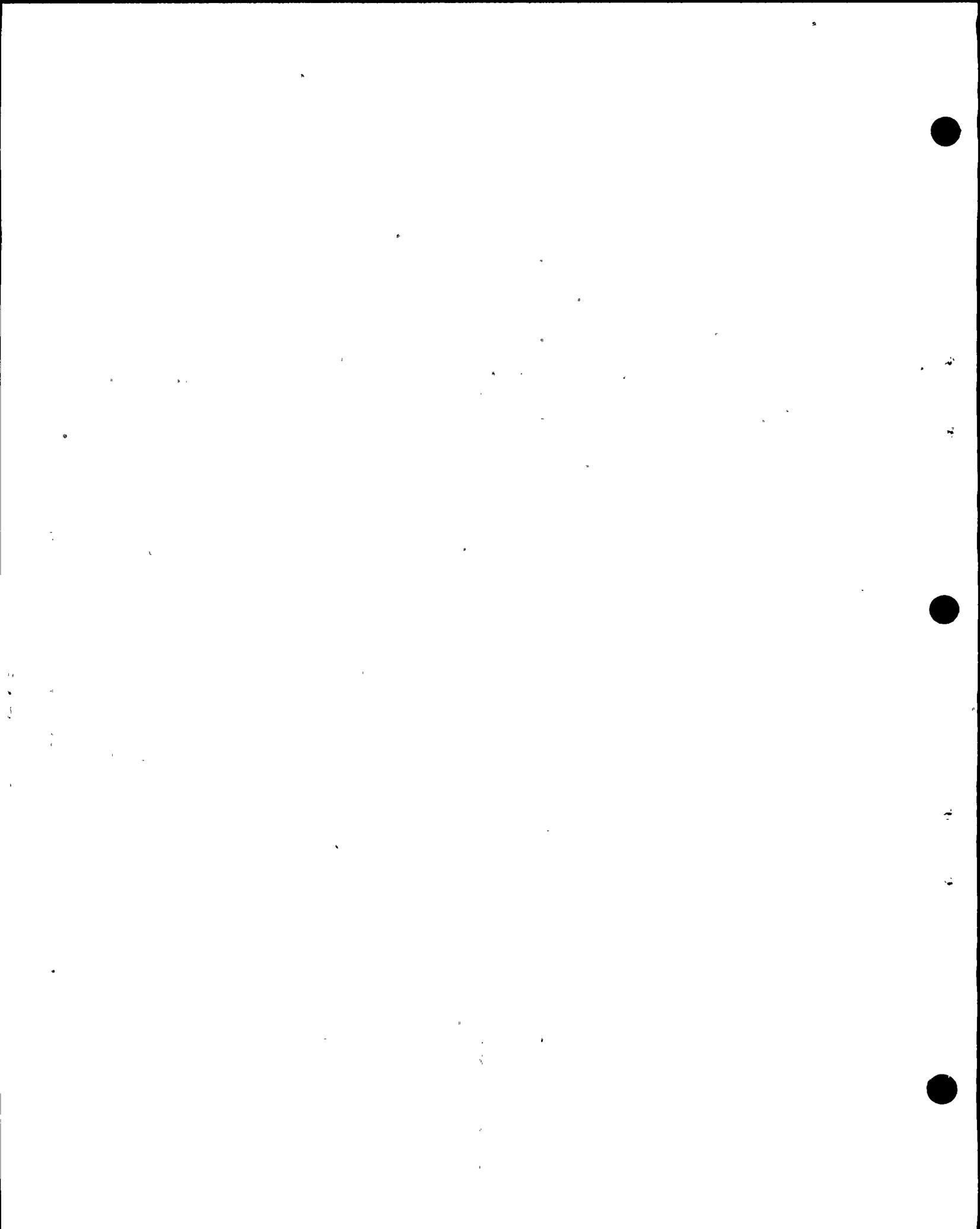
16 Q Just for the record, does each and every member
17 of the panel adopt the testimony as his own, and if not, please
18 indicate?

19 A (No response.)

20 MR. KRISTOVICH: Let the record show that no one
21 has indicated, so each panel member does adopt the testimony
22 as his own.

23 BY MR. KRISTOVICH:

24 Q To Mr. Ghio, turning to Page One, Lines Nine and
25 Ten, by using the term "spatial averaging of accelerations,"
do you mean tau effect?



wrb/agb2

1 A (Witness Ghio) Yes.

2 Q How were the spectra adjusted for tau for the
3 zero period acceleration?

4 A I'm sorry, would you repeat that question?

5 Q How were the spectra adjusted for tau at the zero
6 period acceleration?

7 A (Witness Blume) I'm looking for it in my original
8 direct testimony, it's all in there.

9 Q Page 43?

10 A Yes, it's on Page 43.

11 Q For both the Blume and the Newmark spectra?

12 A Yes.

13 Well, tau was taken as 0.08 under the Blume criteria.

14 Q Which reduced the g's to what?

15 A 0.08.

16 Q Which reduced the g's from 0.75 effective to what?

17 A I'm getting there, to 0.54g.

18 Q And what percentage reduction is that?

19 A I haven't calculated that. Anybody is free to.

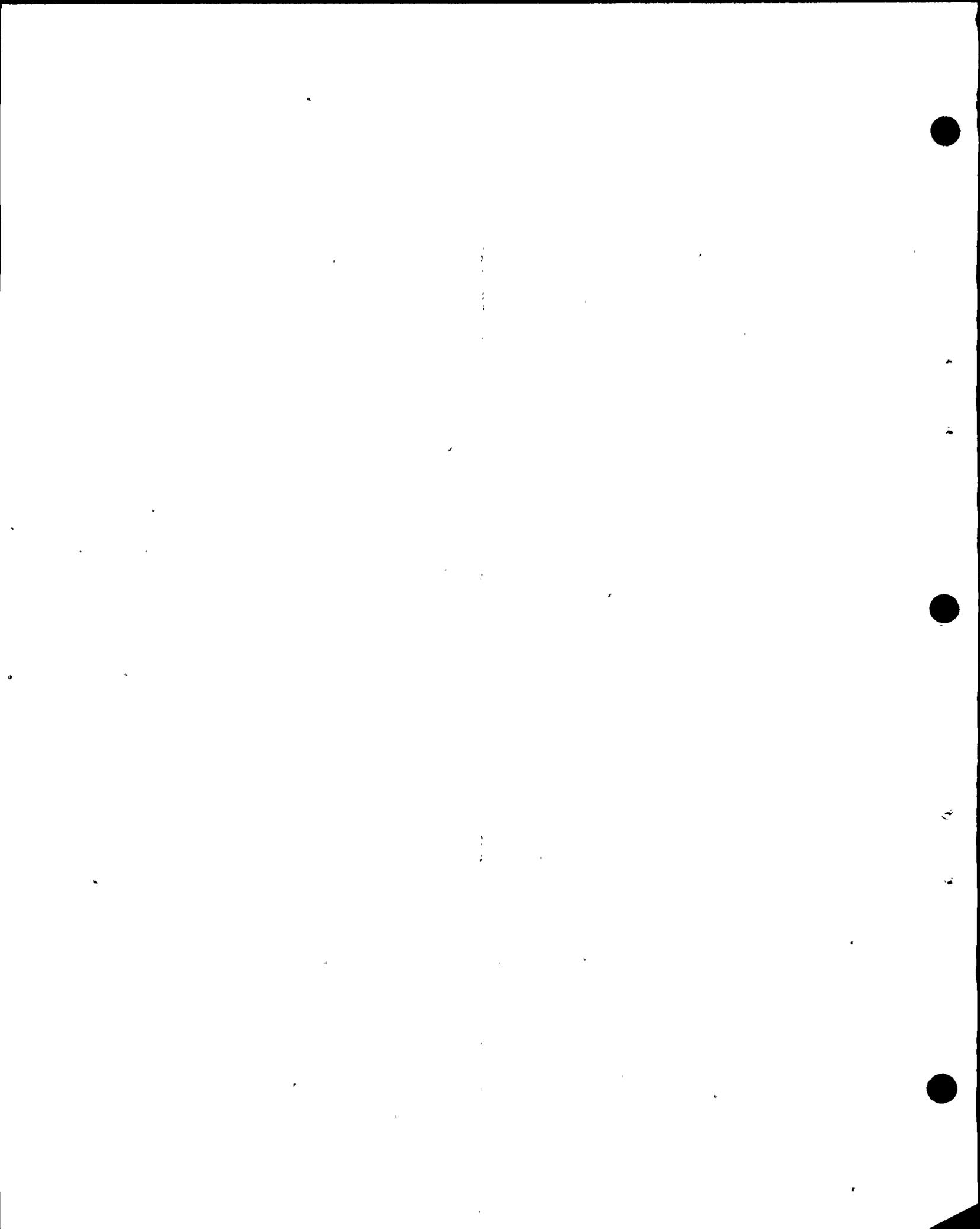
20 Q Well, would that be -- if it's 0.75 to 0.54, that's
21 a reduction of 0.21g, correct?

22 A Yes, at zero period, that's correct.

23 Q So that would be 0.21 over 0.75?

24 A Yes.

25 Q Which is approximately 28 percent, is it not?



1
wrb/agb3

2 A Somewhere in that range, yes.

3 A (Witness Ghio) That's correct.

4 Q And for the Newmark spectra?

5 A (Witness Blume) The Newmark spectra used a tau
6 value of 0.067 and the effective zero period acceleration
7 was 0.50g.

8 Q So, for the Newmark spectra, that would be a
9 reduction from 0.75 to 0.50 or 33 percent?

10 A That's right. At zero period.

11 Q Dr. Blume, what is the fundamental mode for the
12 turbine building, and perhaps you could refer to Figure 16 or 17.

13 A It has changed several times due to strengthening
14 and stiffening. I think I would ask one of the other panel
15 members to give me the latest fundamental mode after the
16 strengthening, if that's what you're referring to.

17 Q Yes.

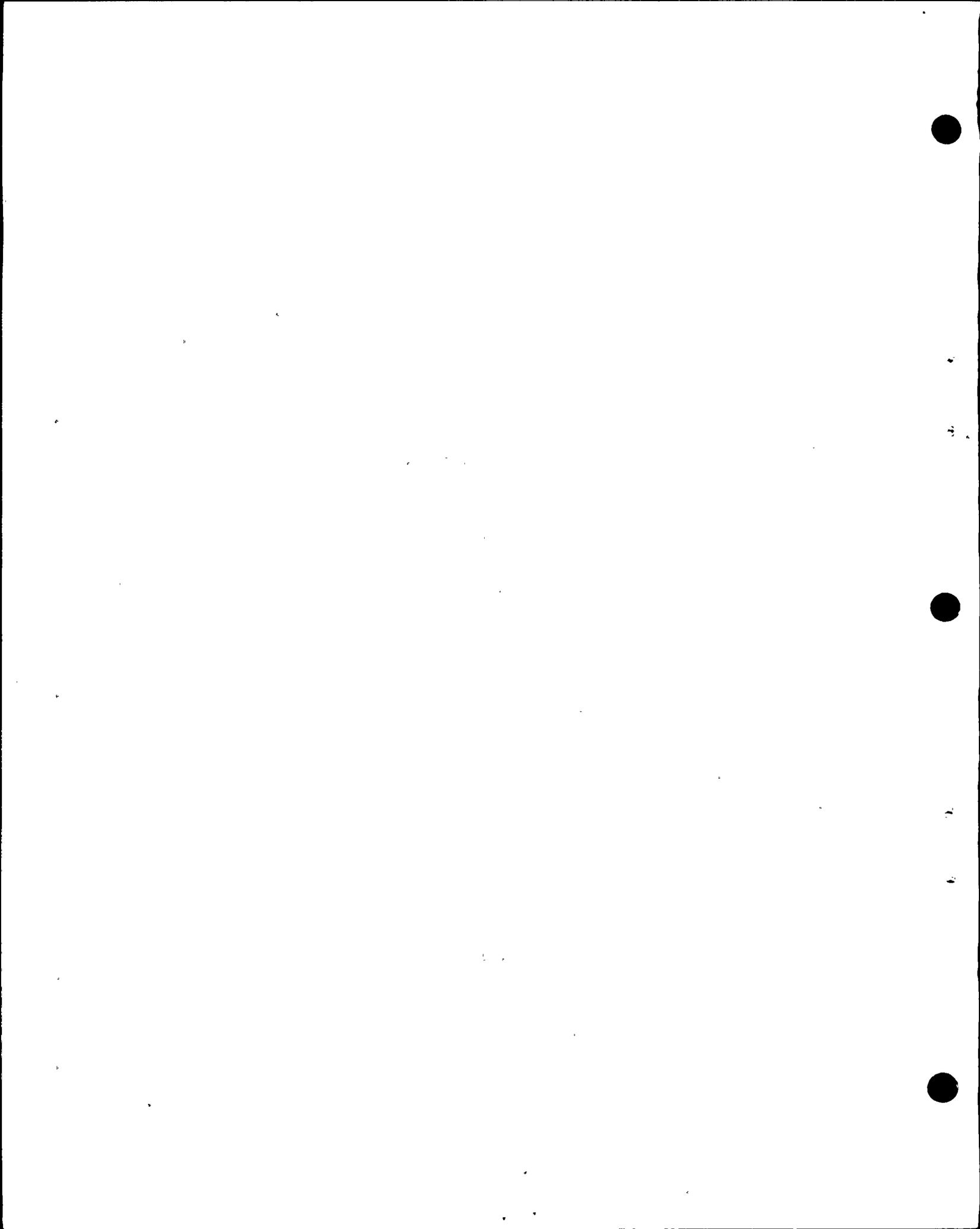
18 A Dave hasn't had a chance to talk.

19 (Laughter.)

20 I think it might be easier for the Board and also
21 for me if you would use Figure 16 or Figure 17 from Dr. Blume's
22 testimony, the figures that deal with the turbine building.

23 MR. NORTON: Mr. Lang, perhaps you could give the
24 numbers before and after strengthening, the two numbers.

25 WITNESS LANG: I'm afraid I don't have the number
before strengthening.



wrb/agb4

1. The fundamental mode of vibration in the north-
2 south direction for the turbine building is approximately
3 0.24 seconds. The fundamental mode in the east-west direction
4 is approximately 0.8 seconds.

5 BY MR. KRISTOVICH:

6 Q So what would the tau factor reduction be of these
7 fundamental modes?

8 A (Witness Lang) Well according to the spectra for
9 the east-west direction, at that mode, there would be no
10 reduction because the building is so flexible.

11 Q And in the other direction?

12 A For the north-south direction, that would have
13 to be computed based on the accelerations for the two spectra.
14 I don't know what those values are.

15 A (Witness Blume) The original value, without any
16 tau reduction, was about 1.8 at that period. And appa
17 it is now 1.5 at that period, so we can refer to our mathe-
18 matician here.

19 A (Witness Ghio) It's about 17 percent.

20 Q Mr. Lang, can you tell us what the damping was
21 at those fundamental modes?

22 A (Witness Lang) The damping used was 7 percent.

23 Q For the concrete?

24 A For the concrete and the steel.

25 That value of 7 percent for damping is compatible



12

A



10

6



1 wrb/agb5

2 with the NRC regulations for bolted steel structures.

3 Q Well can you explain the difference between,
4 perhaps referring to this figure again, can you explain the
5 difference between using 7 percent and 5 percent for the
6 damping at the 0.24, the fundamental mode?

7 A (Witness Blume) The only time 5 percent was used
8 was in the original design.

9 Q Right, I'm asking you to explain for the Board's
10 and for my education, explain the difference between using
11 the 7 percent and the 5 percent.

12 MR. NORTON: Excuse me, Mrs. Bowers, I don't under-
13 stand the relevancy of this. The NRC regulations call for
14 7 percent damping for bolted steel structures. The analysis
15 was done pursuant to NRC regulations. It happens that the
16 NRC regulations 10 years ago called for 5 percent damping,
17 and so at that time 5 percent damping was used in the analysis.

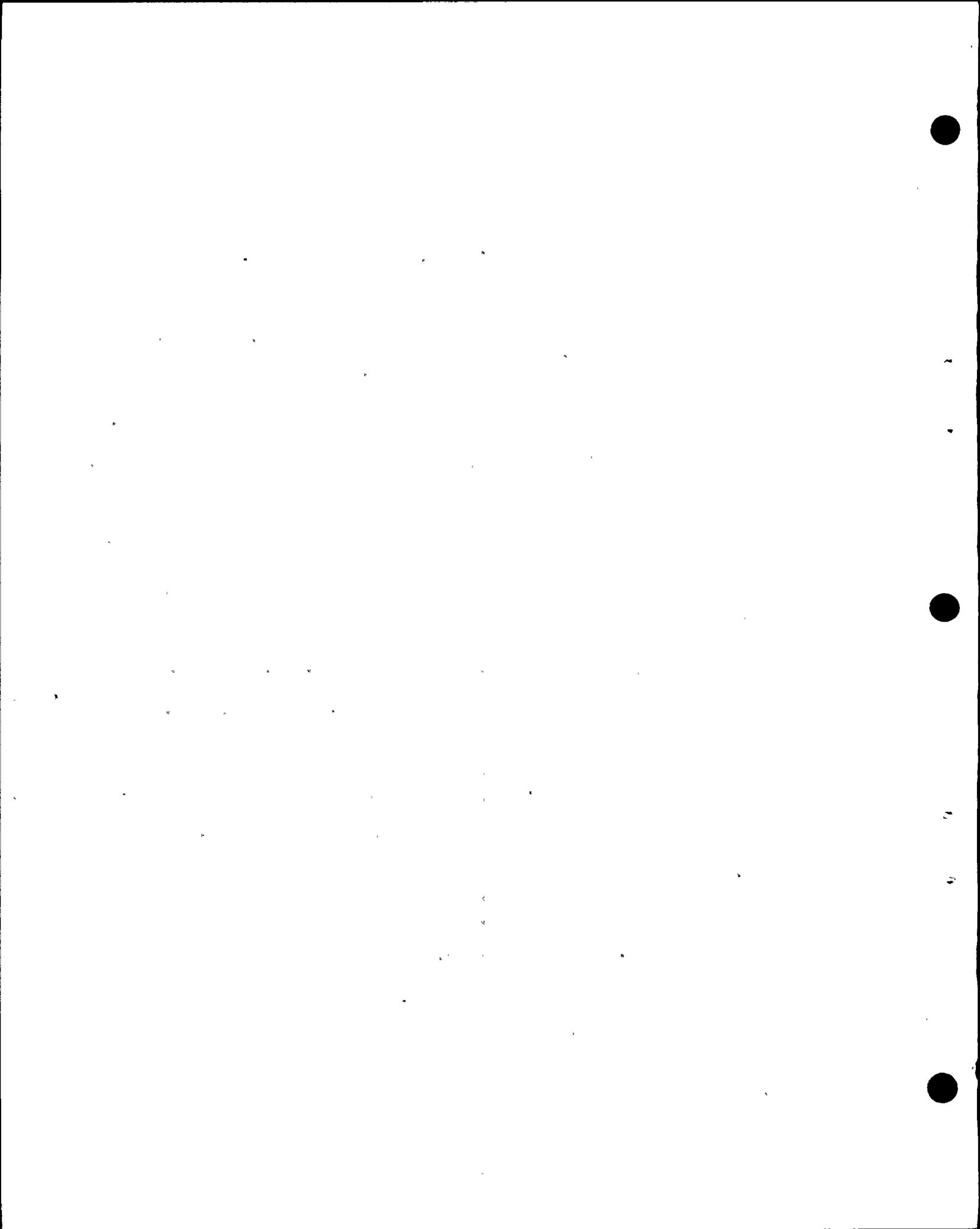
18 But what we're talking about here is the Hosgri
19 analysis, and it's Reg. Guide 1.01 which allows 7 percent
20 damping.

21 WITNESS BLUME: 1.61.

22 MR. NORTON: 1.61, excuse me, allows the 7 percent
23 damping. So why we discuss the 5 percent damping I don't
24 understand the relevancy to these proceedings.

25 MRS. BOWERS: Mr. Kristovich?

MR. KRISTOVICH: Well Mrs. Bowers, it's my



wrb/agb6

1 understanding that Drs. Luco and Trifunac believe that 5 percent
2 damping is a more appropriate figure, and I would like to --
3 and that's the same figure PG&E used originally, and I would
4 like this panel to explain just the difference between using
5 5 and 7 percent.

6 MR. NORTON: Mrs. Bowers, Trifunac and Luco may
7 well -- I don't know that that's accurate on both counts --
8 say that 5 percent is more appropriate than 7 percent, but
9 that's an attack on the regulations and that's not appropriate
10 in these proceedings.

11 MRS. BOWERS: I thought it was a Regulatory Guide.

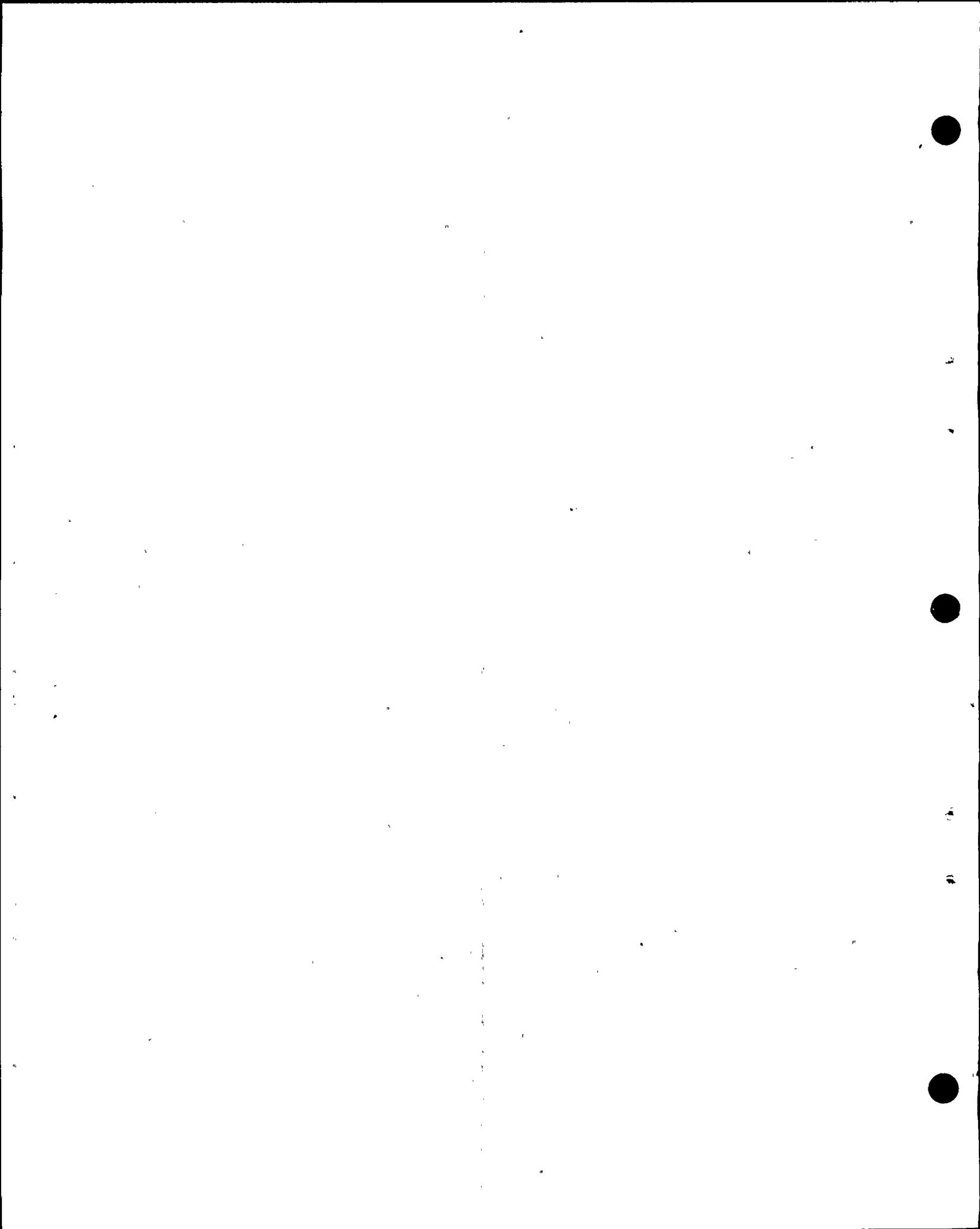
12 MR. NORTON: A Regulatory Guide, that's correct.
13 And that's a generic number, 7 percent, that's not just
14 Diablo Canyon, that's 7 percent Reg. Guide, 7 percent damping.

15 MR. KRISTOVICH: Mrs. Bowers, it is a Reg. Guide,
16 not a regulation.

17 MRS. BOWERS: With a Reg. Guide, as I understand
18 it, Applicant can propose a different method of accomplishing
19 the same thing. But when you're dealing with set percentages,
20 you know, it would be a slightly rigid situation.

21 We'd like to hear from the Staff on this.

22 MR. NORTON: Mrs. Bowers, what puzzles us is that
23 one of their contentions says we don't follow the regulations,
24 and here we're following the regulation and they say we shouldn't
25 follow the Reg. Guide, I don't understand. They can't have



wrb/agb7

1 it both ways. It's either relevant or it's irrelevant.

2 MR. KRISTOVICH: Mrs. Bowers, some of the damping
3 is taken up in the effective acceleration reduction.

4 WITNESS BLUME: No.

5 MR. NORTON: That's contrary to the prior
6 testimony which went into damping.

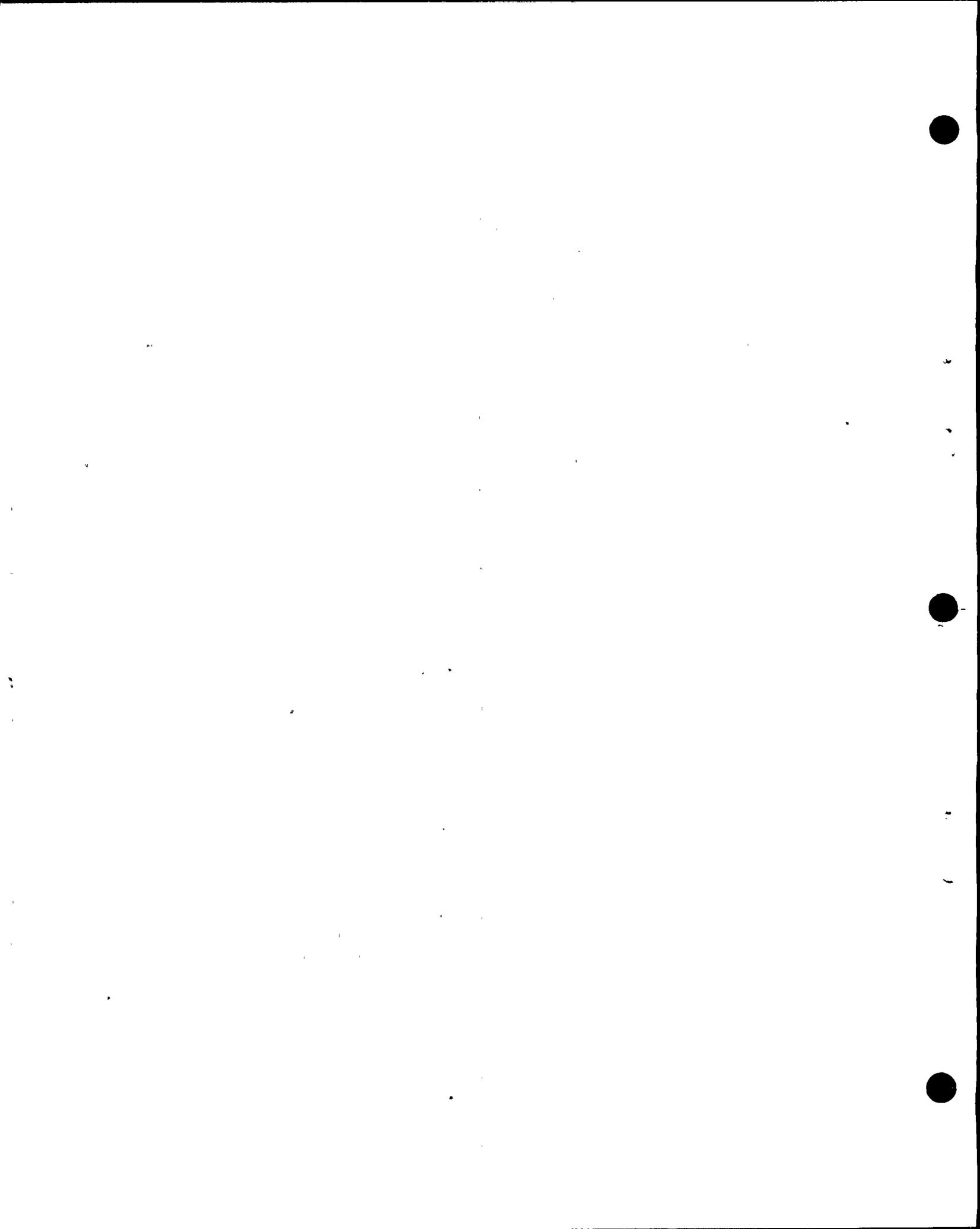
7 MRS. BOWERS: We'd like to hear from the Staff.

8 MR. KETCHEN: Mrs. Bowers, I think we're a little
9 bit off the track. The objection, as I understood it, was
10 Mr. Norton didn't understand the line of questioning, where
11 we were going about the 5 percent and the 7 percent and
12 that type of thing, that's where the first objection came up.

13 It seems to me that Mr. Kristovich was asking for
14 some background information and some explanation from this
15 panel of how we got from the 5 percent damping factor in the
16 original design to the 7 percent damping factor that is now
17 being used, and there was an explanation given.

18 The point I'm coming to is that I think it is
19 a legitimate line of inquiry, to a certain extent, as long as
20 it does explain that difference of why 5 percent at one time
21 and 7 percent at another time. So that's our position,
22 that it is a legitimate line of inquiry for a certain extent.

23 MRS. BOWERS: Well, but as I understand the Joint
24 Intervenors' position, they're trying to establish that 5
25 percent is appropriate rather than 7 percent.



1 wrb/agb8

Is that correct?

2 MR. KRISTOVICH: Mrs. Bowers, actually we just
3 want to show the difference between using 5 percent and 7 per-
4 cent. And that was what the original question was.

5 MR. NORTON: Mrs. Bowers, I think Mr. Ketchen
6 has misconceived both the question and my objection. My
7 objection was that the difference between 7 and 5 percent is
8 what they're after, and Mr. Kristovich stated that it's their
9 position that 5 percent is appropriate as opposed to 7 percent.
10 That is an attack on the Reg. Guide and it's not proper in
11 these proceedings and that remains our position.

12 MR. KRISTOVICH: What Mr. Norton just said was
13 irrelevant to what my original question was. I'm merely
14 interested in having Mr. Lang or Dr. Blume explain the dif-
15 ference between using 5 percent damping and 7 percent damping
16 at the fundamental mode for the turbine building.

17 MR. NORTON: But Mrs. Bowers, we could also say
18 that what's the difference between that and 3 percent and
19 that and 1 percent and that and 9 percent and 11 percent,
20 but it's not relevant. Seven percent was used. The Reg.
21 Guides call for 7 percent. And to compare it with a bunch
22 of different other percentages or any one other percentage
23 isn't relevant.

24 MR. KRISTOVICH: It seems 5 percent is relevant.

25 MRS. BOWERS: Well the Board will consider this



wrb/agb9

(The Board conferring.)

MRS. BOWERS: The Board has determined that the record, it's appropriate for the record to show what happens when you go from 5 percent to 7 percent. So your objection is overruled.

WITNESS BLUME: Can you repeat the question, please?

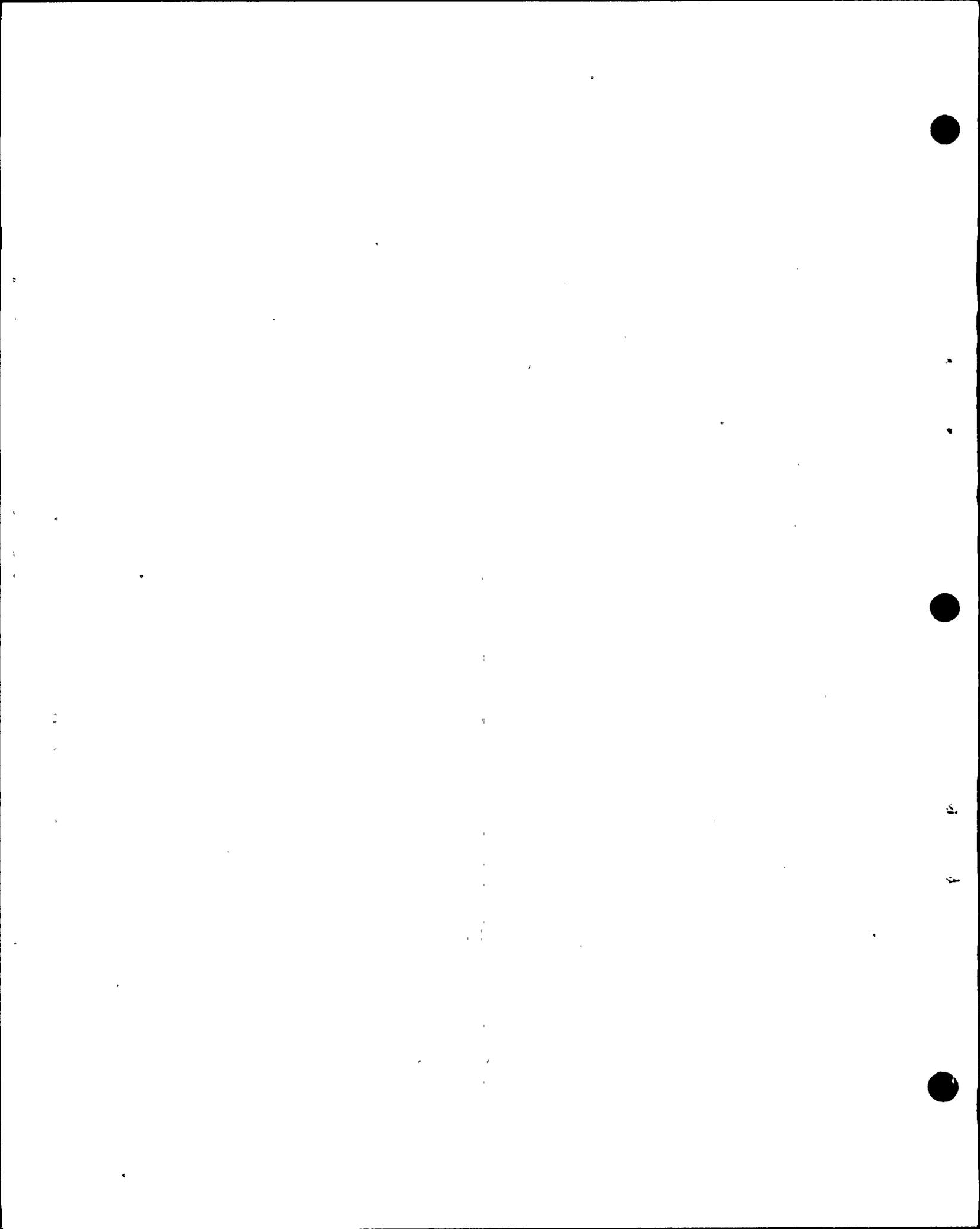
BY MR. KRISTOVICH:

Q Could you explain the difference between using 5 percent and 7 percent at the fundamental mode?

A (Witness Blume) You mean the difference in the results if that were done hypothetically?

Q The difference in g levels.

endlA



1B

WRB/wbl

1 A The damping determinations were all set out in
2 my direct testimony.

3 Q Dr. Blume, I don't believe you heard what I said.
4 The different in the g levels.

5 A On the spectrum at the period--

6 Q At the fundamental mode, for 5 and 7 percent.

7 A All right. We'll do--

8 Q I believe you can refer to your Figure 16 in your
9 testimony.

10 A We do this strictly as a hypothetical because we
11 believe that 5 percent is not applicable. But we find on
12 Figure 16 of my direct testimony at 5 percent and a period
13 of .24 it reads about 1.71g, whereas at 7 percent it reads
14 1.5g. That's on the Blume spectrum.

15 On the Newmark spectrum--

16 Q Is that Figure 17?

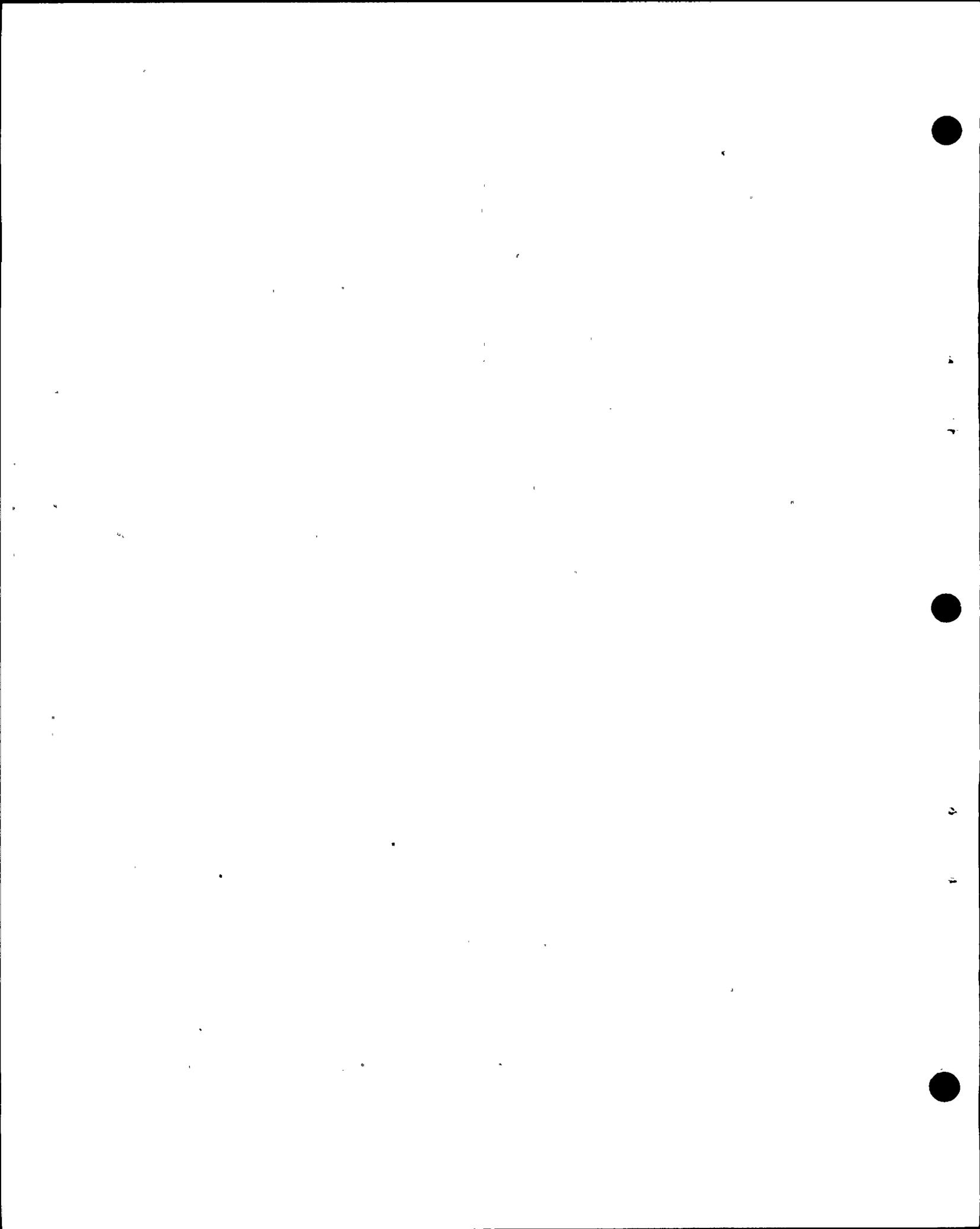
17 A Yes, that would be Figure 17, for the turbine
18 building. At the same period, about 1.3 -- would you say,
19 Dave? --as compared to about 1.19 or 2, 1.2; it's hard to
20 read very closely.

21 Q Okay. That's fine.

22 Mr. Lang, was this turbine building originally
23 designed as a Category 2 structure?

24 A (Witness Lang) I believe it was, yes.

25 Q What is the difference in the design criteria for



1 Category 2 structures and Category 1 structures?

WRB/wb2 2 A I think that would be better answered by Mr. Ghio
3 since PG&E is better able to handle a question regarding
4 seismic classification of nuclear power plants.

5 A (Witness Ghio) The question was, What's the
6 difference between the--

7 Q The design criteria for Category 2 structures and
8 Category 1 structures.

9 A Okay. As I recall, the original criteria for
10 structures classified as Category 2, design Category 2,
11 procedures consistent with the Uniform Building Code would
12 be appropriate, whereas Category 1 required a dynamic
13 analysis for the operating basis, originally termed design
14 earthquake and double design earthquake.

15 Q Were a lot of modifications therefore necessary
16 because you had Category 1 equipment in a Category 2 building?

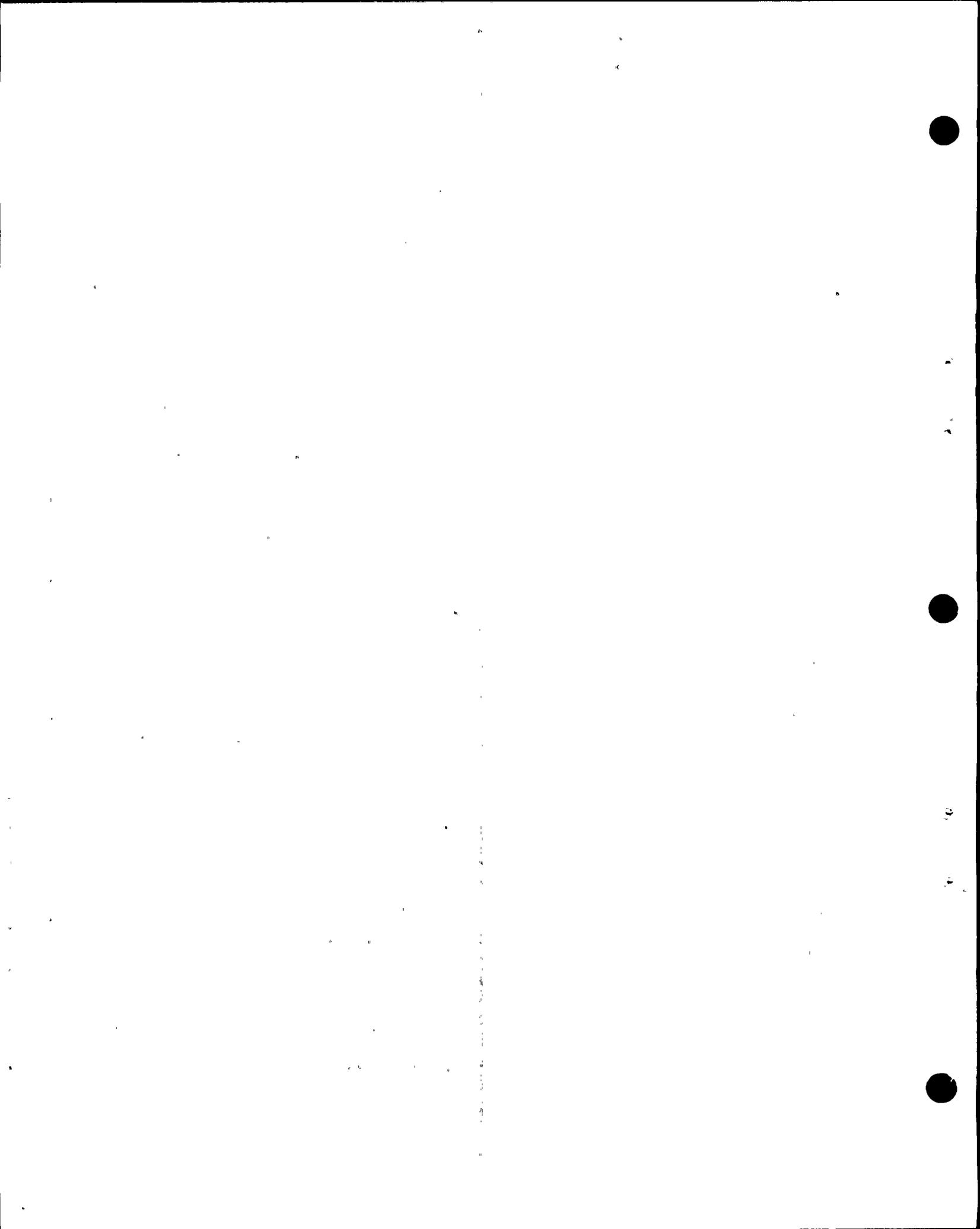
17 A Were a lot of modifications required when?

18 Q Now. For the re-analysis.

19 A Yes. I just presented a summary in my testimony,
20 and the prepared testimony delineates the wide spectrum of
21 modifications that were necessary to enable the turbine build-
22 ing to sustain a magnitude 7.5 Housgrit earthquake.

23 Q I guess what I'm trying to get at: Is the root
24 cause of this because it was originally a Category 2 structure?

25 A Well that's not the total reason for the need for



1 the modifications. You have to remember that the magnitude
2 7.5 earthquake is substantially higher than the original
3 prescription.

4 Q Right. But other buildings that were Category 1
5 structures originally did not have to have as many modifica-
6 tions; is that correct?

7 A That's correct.

8 Q Were there any other structures that were
9 originally Category 2 that were re-analyzed as Category 1?

10 A The intake structure is of the same nature.

11 Q Q Were there any other structures?

12 A No.

13 Q Mr. Ghio, turning to Table 1 of the direct testi-
14 mony, the fourth column is labeled "allowable stress or load."
15 Could you define allowable stress or load?

16 A I'll provide a response to the question, and I
17 may ask for some amplification by Mr. Lang.

18 Q All right.

19 A The allowable stress or load is that which was
20 derived using the actual material properties as the basis for
21 the derivation of allowable stresses, using in the case of
22 concrete the American Concrete Institute code formulations,
23 and for structural steel we would have utilized the American
24 Institute of Steel Construction code.

25 The values resulting from that application are



1 those listed in the fourth column of Table 1.

2 A (Witness Blume) May I add one brief thing to
3 that?

4 The actual values that Mr. Ghio mentioned for
5 the concrete were the actual test values at 28 or 60 days
6 as the case might be. The real actual values today are many
7 times that, at least several tens of percent higher than that
8 due to the aging factor which has been ignored in the analysis.

9 Q Was it ignored for the turbine pedestal analysis?

10 A Yes.

11 Q --this additional aging? Mr. Lang?--

12 A (Witness Lang) For the pedestal analysis the
13 actual in-place strength of concrete was used.

14 Q The six-year average?

15 A Yes.

16 Q In your allowables did you utilize a capacity
17 reduction factor?

18 A (Witness Yokoyama) I'll answer that question.

19 Yes, we used a phi factor of .9 for reinforcing
20 steel and concrete elements.

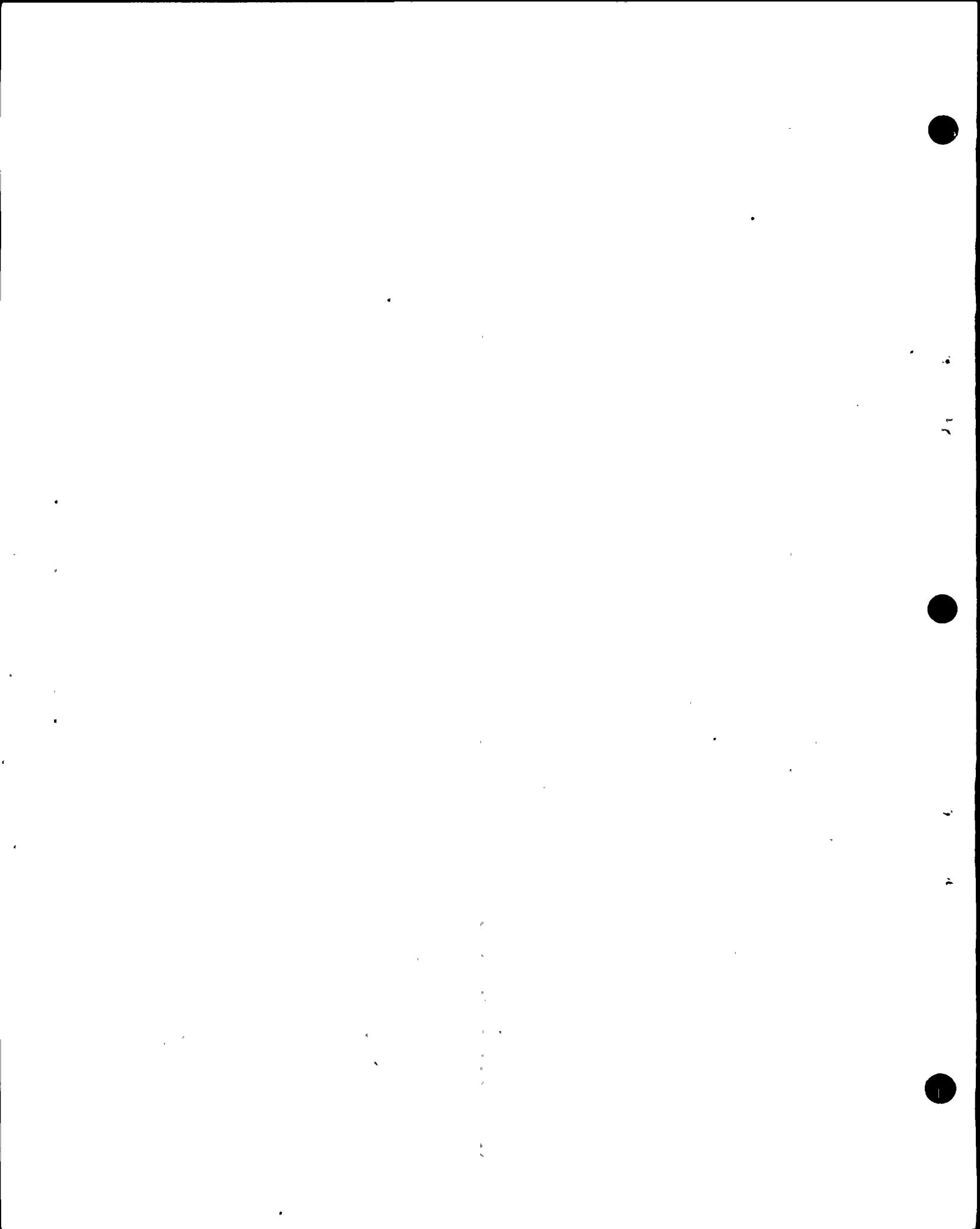
21 Q Did you say a phi factor of .9?

22 A Yes, that's correct.

23 Q And that was for the concrete and what?

24 A That's for the reinforcing steel and the concrete
25 structures.

WRB/wb4



1 Q Mr. Yokoyama, is that true for the turbine
2 pedestal analysis as well? Did you use a phi of .9?

3 A I think Mr. Williams would be able to answer
4 that question better than I.

5 A (Witness Williams) No, it's not true.

6 Q What phi did you use for the turbine pedestal
7 analysis?

8 A One.

9 Q Why did you use .9 in one case and 1 for the
10 turbine pedestal analysis, a phi of 1 for the turbine
11 pedestal analysis?

12 A We were trying to do a realistic analysis of the
13 evaluation as distinct from design. In the case of the turbine
14 pedestal we believed that 1 was the appropriate value.

15 A (Witness Blume) I might be partially to blame
16 for that. When I finally found out they were using .9 and
17 .95 respectively I got a little excited. I think it's
18 ridiculous to use phi factors on a structure already built
19 and tested. The phi factors, as was mentioned yesterday,
20 are in preparation of the unanticipated problems in the con-
21 crete mix and the placing of steel and other things. And I
22 think a factor of 1 could have been used throughout.

23 Q Well, Dr. Blume, who was responsible for deter-
24 mining which phi to use, since it seems to vary?

25 A Who was responsible? I imagine that would be,

WRB/wb5



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1 in the case of this plant it would be joint agreement after
2 discussion between the NRC Staff and the people involved
3 working on the structures. And also during audit. Many of
4 these things were discussed during audit.

5 But if you're asking who's responsible for the
6 original phi factors, they were committees of various organi-
7 zations working on a different problem, namely, the design
8 specifications for buildings yet to be built.

9 A (Witness Yekoyama) Can I add something to what
10 Dr. Blume said?

11 One of the reasons I used .9 is, this is the
12 modification. This is modification to existing structures.
13 So we are specifying materials. We did not have test
14 results on these materials. This is the reason we used .9
15 for this particular structure.

16 A (Witness Blume) --which would not be true for
17 the pedestals. They were existing.

18 Q Mr. Ghio, did you do an OBE analysis for the
19 turbine building?

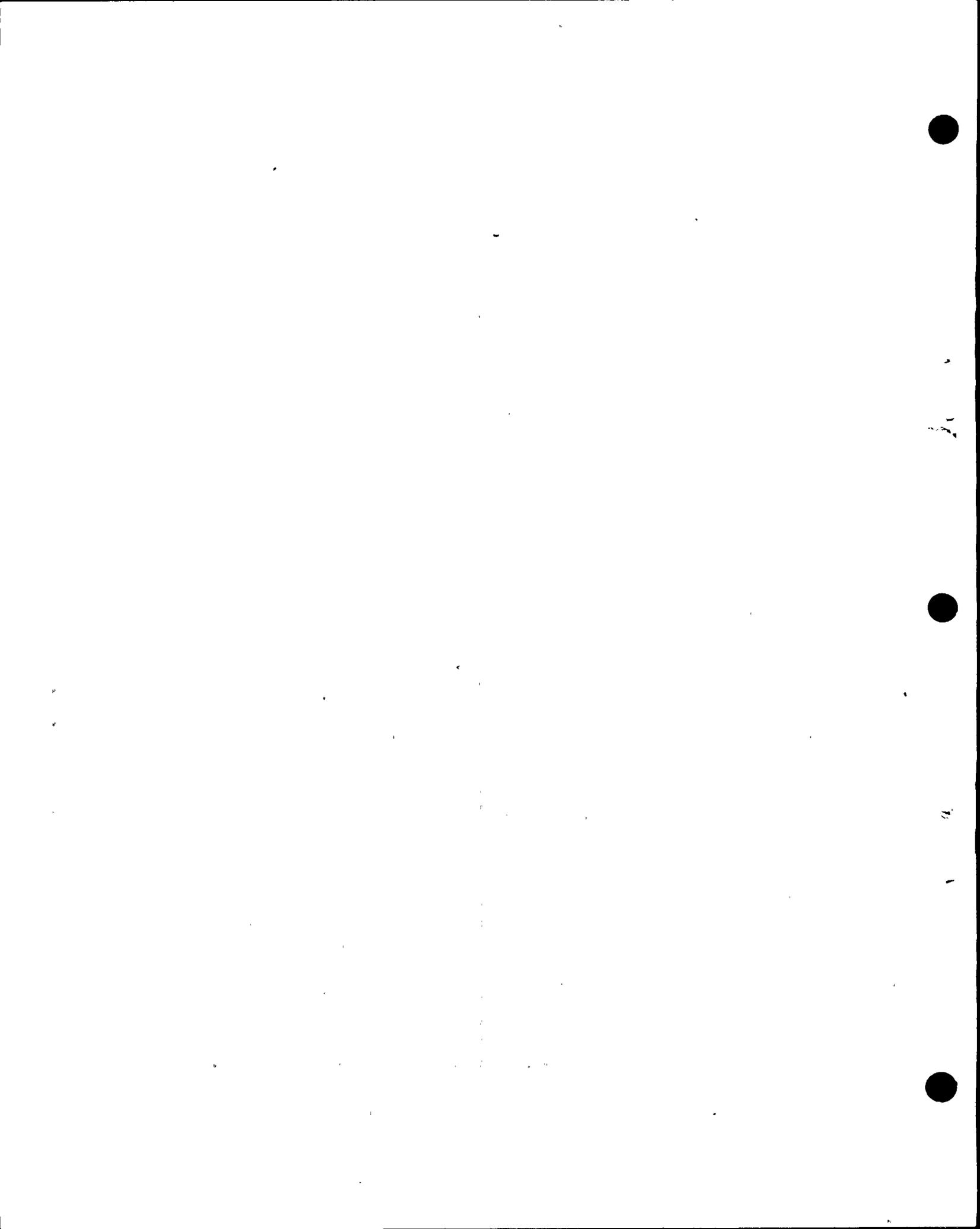
20 A (Witness Ghio) No, an OBE -- better stated: DE
21 analysis for the turbine building was not performed.

22 End 1B

23 WE 1s

24

25



1 Q There is Category-1 equipment in the turbine
2 building, isn't there?

3 A Yes, there is.

4 Q Okay, Mr. Ghio, directing your attention to page 1
5 of the written testimony, lines 21 through 24, specifically
6 line 22 and 23, what is the physical basis for assuming an
7 accidental torsion of 10 percent?

8 A (Witness Ghio) I'll have Mr. Lang or Mr. Blume
9 answer that.

10 A (Witness Lang) The situation here is similar to
11 the fuel handling building described yesterday.

12 In the absence of a rigid diaphragm --

13 Q I'm sorry? I didn't catch that.

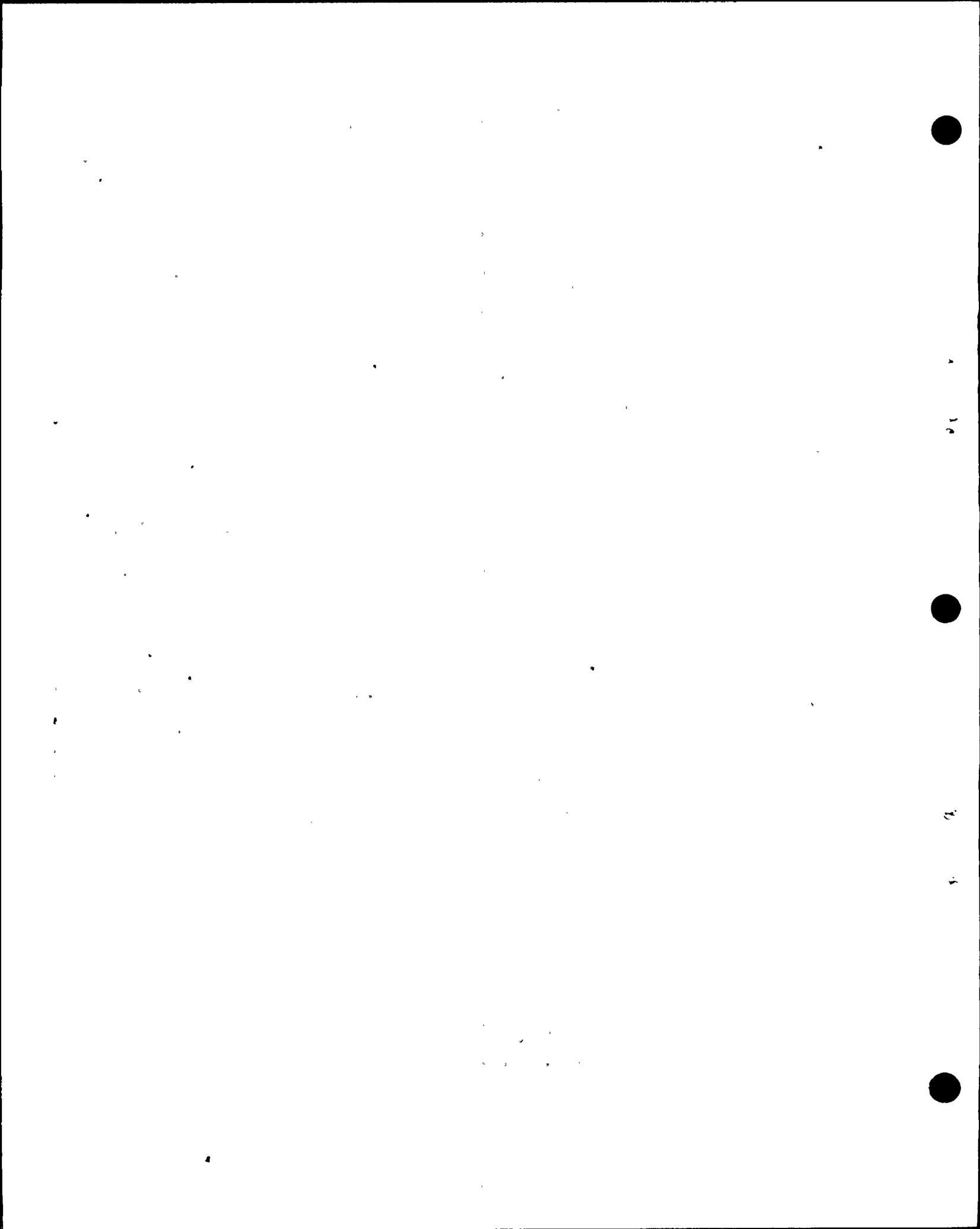
14 A The absence of a rigid diaphragm prevented the use
15 of accidental torsion, as specified in the UBC. An analogy
16 was made to the case of a simply supported beam, by taking a
17 concentrated load and moving --

18 Q Excuse me. I can't hear what you're saying.

19 A To make the analogy between a flexible diaphragm
20 and a simply supported beam, and take a concentrated load at
21 the center of that beam and move it five percent, the reaction
22 at the end of the beam increases 10 percent.

23 And so that analogy was used here.

24 The NRC Staff required justification of this
25 analysis, and we did perform an actual torsional analysis



wel 2

1 considering the flexibility of the diaphragm of the turbine
2 building, and the 10 percent increase was shown to be conserva-
3 tive.

4 Q Okay, Mr. Ghio, are there any parts of the turbine
5 building that may go into the inelastic region during the
6 Hosgri event?

7 A (Witness Ghio) Yes, there are some limited cases.
8 However, the so-called inelastic excursion is within the
9 acceptance criteria.

10 Q Could you list those cases?

11 A Yes, I can list the case involving the end walls of
12 the turbine building. It involves structural steel bracing in
13 the end bents of the turbine building.

14 The other case may relate to the piers or columns
15 in the turbine pedestal where we evaluated the system for both
16 the Blume and the Newmark input spectra, with the Blume
17 spectra having been corrected by a ductility correction at
18 the front end of the analysis.

19 Q Are there any cranes that may go into the inelastic
20 region?

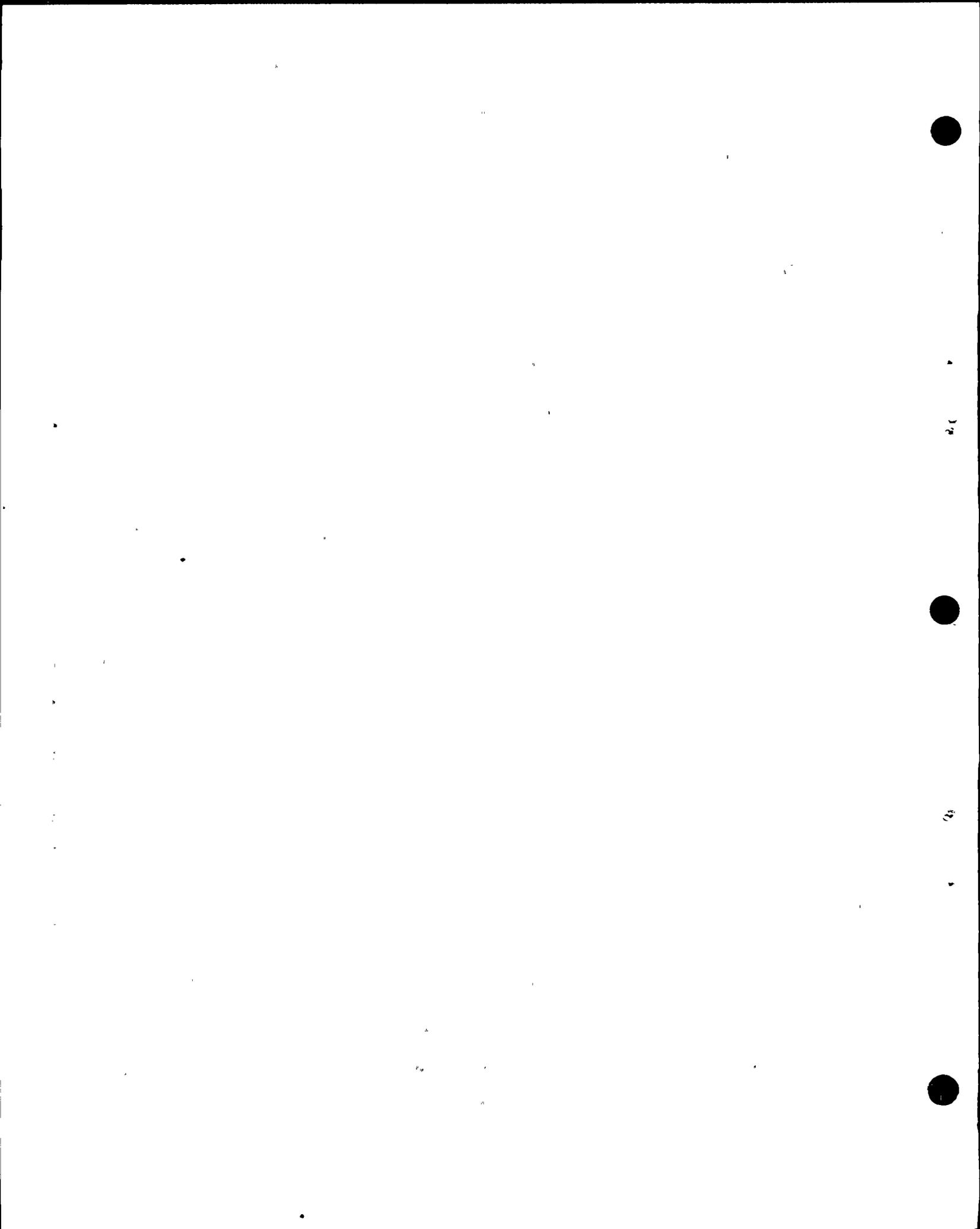
21 A Cranes?

22 Q Cranes.

23 A I'll have Mr. Lang answer that.

24 A (Witness Lang) No.

25 Q Well, Mr. Lang, does the location of the crane
affect the end bent analysis?



wel 3

1 A Yes, it does. As Mr. Ghio described, an analysis
2 showed that if the crane were parked at the end and the
3 earthquake were to occur at that time, then the end bents--
4 certain members in the end bents would experience stresses in
5 excess of yield.

6 Q Directing your attention to page 4, lines 19 to 23,
7 what are the ductility limits?

8 A (Witness Ghio) The question was what are the
9 ductility limits?

10 Q Yes.

11 A The question stems from the last sentence in the
12 section that you just --

13 Q Yes. Well, line 23 reads:

14 "The results were within the ductility limits in
15 the criteria."

16 Could you explain what the ductility limits are?

17 A Just a moment, please?

18 Q Sure.

19 (Pause.)

20 Perhaps you could explain what ductility is.

21 A (Witness Lang) Ductility limits in the criteria for
22 steel members are three on an inter-storey basis, six locally.

23 What that means is that as the members stress
24 beyond yield, it displaces far greater than it does under
25 normal inelastic stresses. and if you were to take the final



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29

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wel 4

1 inelastic displacement divided by the yield displacement, that
2 is the ductility.

3 "The limit being three on an inter-storey basis means
4 that it can be displaced three times the yield displacement.

5 Q Were the criteria also six locally?

6 A Yes.

7 Q And what does that mean?

8 A (Witness Blume) Well, the three refers to a storey
9 by storey basis, and the six locally would refer to a possible
10 joint or some single element of a member that might locally
11 go to the limit of six.

12 As long as the average of the storey was three,
13 this would still be within the criterion.

14 I might note that for ordinary office buildings and
15 other structures that exist everywhere, ductilities in major
16 earthquakes will be many times this, in the order of 8, 10,
17 12 storey ductilities.

18 Q Mr. Ghio, is it true that your criteria for
19 impingement between the turbine building structure and the
20 turbine pedestal allowed for limited local structural damage
21 such as concrete chipping or spalling?

22 A (Witness Ghio) I don't recall that criteria. I
23 can relate that the modification that we've implemented here
24 involved enlargement of the gap that had existed between the
25 turbine pedestal and the surrounding structure, an enlargement



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wel 5

1 sufficient to prevent impingement. That is, the gap is
2 greater than the absolute summation of the displacements of
3 the two contiguous structures.

4 Q Well, could you turn to page 4-7 of the Hosgri
5 reanalysis? Do you have a copy of it there? Volume 1.

6 A I'm sorry, I don't believe we do have a copy here.

7 MR. NORTON: What's the page number again?

8 MR. KRISTOVICH: 4-7, actually beginning with the
9 last sentence on 4-6 and going on to 4-7.

10 BY MR. KRISTOVICH:

11 Q I'll read it to you, Mr. Ghio:

12 "The possibility of impingement between the
13 turbine building structure and the turbine
14 pedestal is considered in the response calcu-
15 lations with the assumption that limited
16 (controlled) local structural damage, such
17 as concrete chipping or spalling, is permis-
18 sible provided the overall safety of the
19 structures for the Class-1 equipment is not
20 impaired."

21 A (Witness Ghio) It sounds like a criteria statement,
22 all right, at the front end of the program. But it's really
23 a moot point at this point, because the actual analysis showed
24 what the depth deflections of the two structures were, and we
25 elected to enlarge the gap to prevent impingement and avoid the



wel 6

1 necessity of doing any kind of analysis of this phenomenon.

2 Q So there will be no impingement?

3 A That's correct.

4 Q Directing your attention to page 5, lines 6 and 7,
5 it's stated that based on a number of tests the actual in-place
6 strength of the concrete was determined to be 6,000 psi.

7 What was the minimum specified original design
8 strength of the concrete?

9 A I'll have Mr. Li answer that question.

10 A (Witness Li) 3,000 psi.

11 Q Mr. Li, is it true that the average of the 28-day
12 samples of the concrete was 3,870?

13 A No. More than that. I think it was 3870 psi.

14 Q Excuse me?

15 A 3870.

16 Q 3870?

17 A 3870, right.

18 Q That's what I said.

19 Mr. Li, could you describe the test methods used to
20 get 6000?

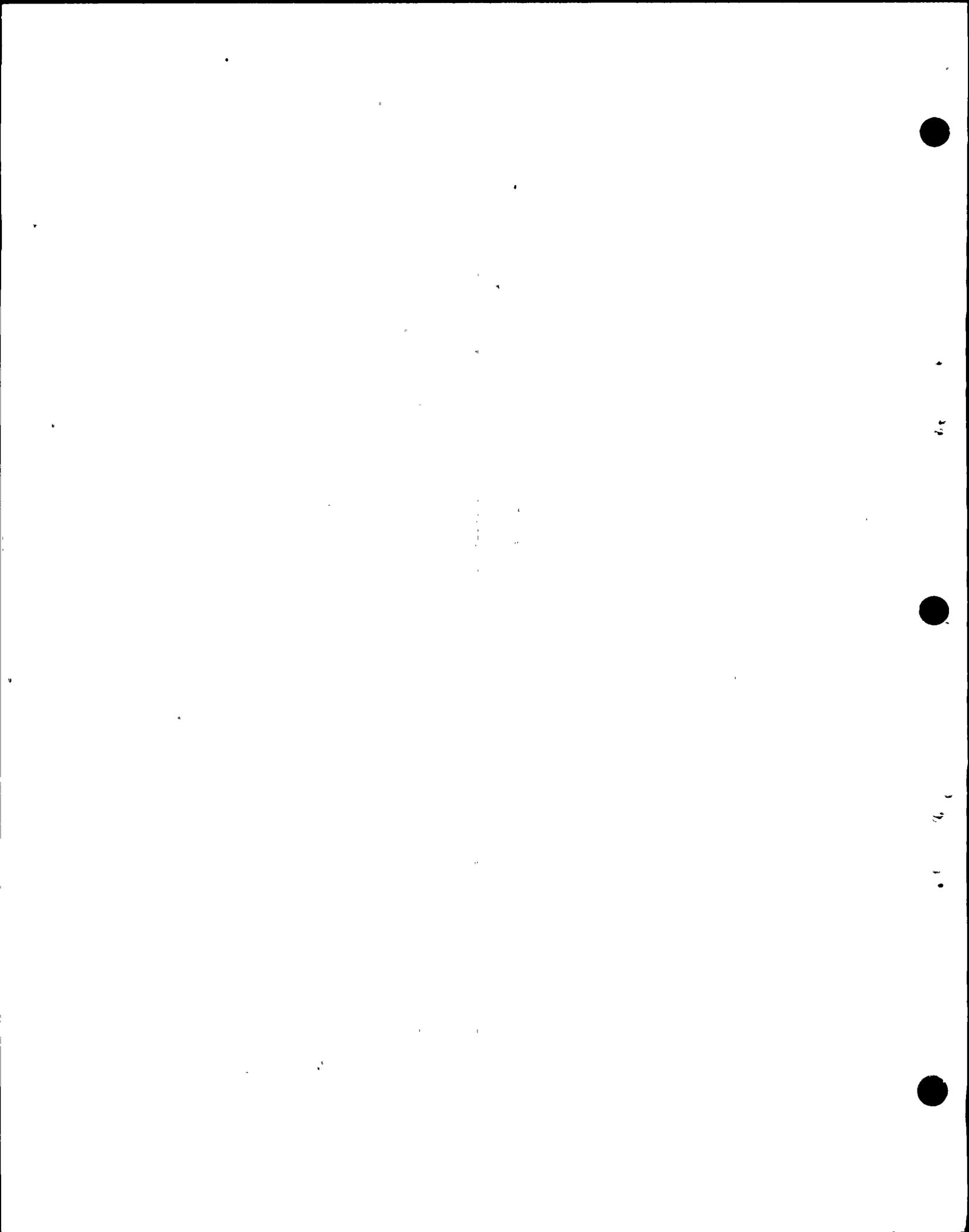
21 A Yes, there were three methods that were used.

22 Number one, based on cylinder test.

23 Number two, based on Schmidt hammer test.

24 Q Did you say cement hammer test?

25 A Schmidt.



wel 7

1 A (Witness Blume) Schmidt, S-c-h-m-i-d-t.

2 A (Witness Li) Number three, based on core drill

3 sample test.

4 Q Could you describe the cylinder test?

5 A Cylinder test, when we pour concrete we made many

6 cylinders which were tested at the different stages, such as

7 at the 7 days, 14 days, 28 days, and so on and so forth.

8 Some of them were tested after 5 or 6 years.

9 Q How many were?

10 A I don't know how many.

11 Q Do any members of the panel know how many were

12 tested after six years?

13 A (Witness Ghio) Excuse me. You're asking how many

14 test cylinders we tested for the turbine pedestal?

15 Q Yes.

16 A I don't recall the count, but it's prescribed in

17 the appropriate ASTM or ACI standard for concrete testing.

18 A (Witness Williams) I believe it was of the order

19 of 20 or 30, maybe more. It's a large number.

20 Q Do you know what the spread in the data was?

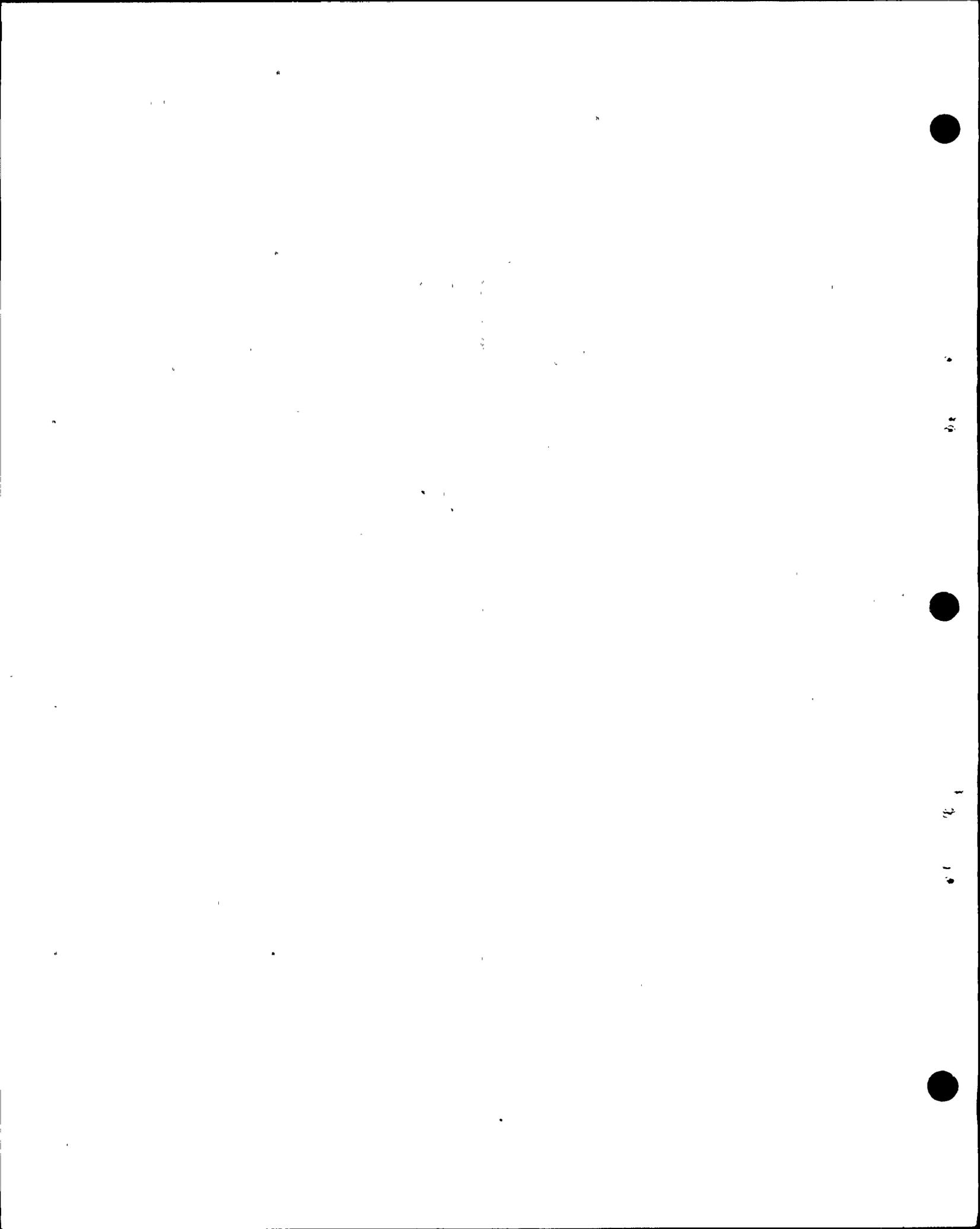
21 A I don't remember offhand.

22 Q Do you know what the average was?

23 A It was over 6000 psi.

24 Q Mr. Li, could you describe the Schmidt hammer test?

25 A (Witness Li) Schmidt hammer is an instrument which



wel 8

1 / can test the concrete strength of the existing concrete.

2 Q And how does it do that?

3 A I didn't do that myself. Our research department
4 did the work.

5 Q Do you know how the test is done?

6 A (Witness Bluma) I can briefly describe it for you.

7 It's a non-destructive test where an instrument is
8 used that has an impact against the surface of the concrete,
9 and the amount of rebound can be calibrated to the actual
10 strength of the concrete by various calibration tests.
11 Carefully operated it gives a very good indication of concrete
12 strength without breaking the concrete.

13 Q Do you know what the accuracy of the measurement is?

14 A No, it depends upon the operator, but I would judge
15 within 5 to 10 percent at the most.

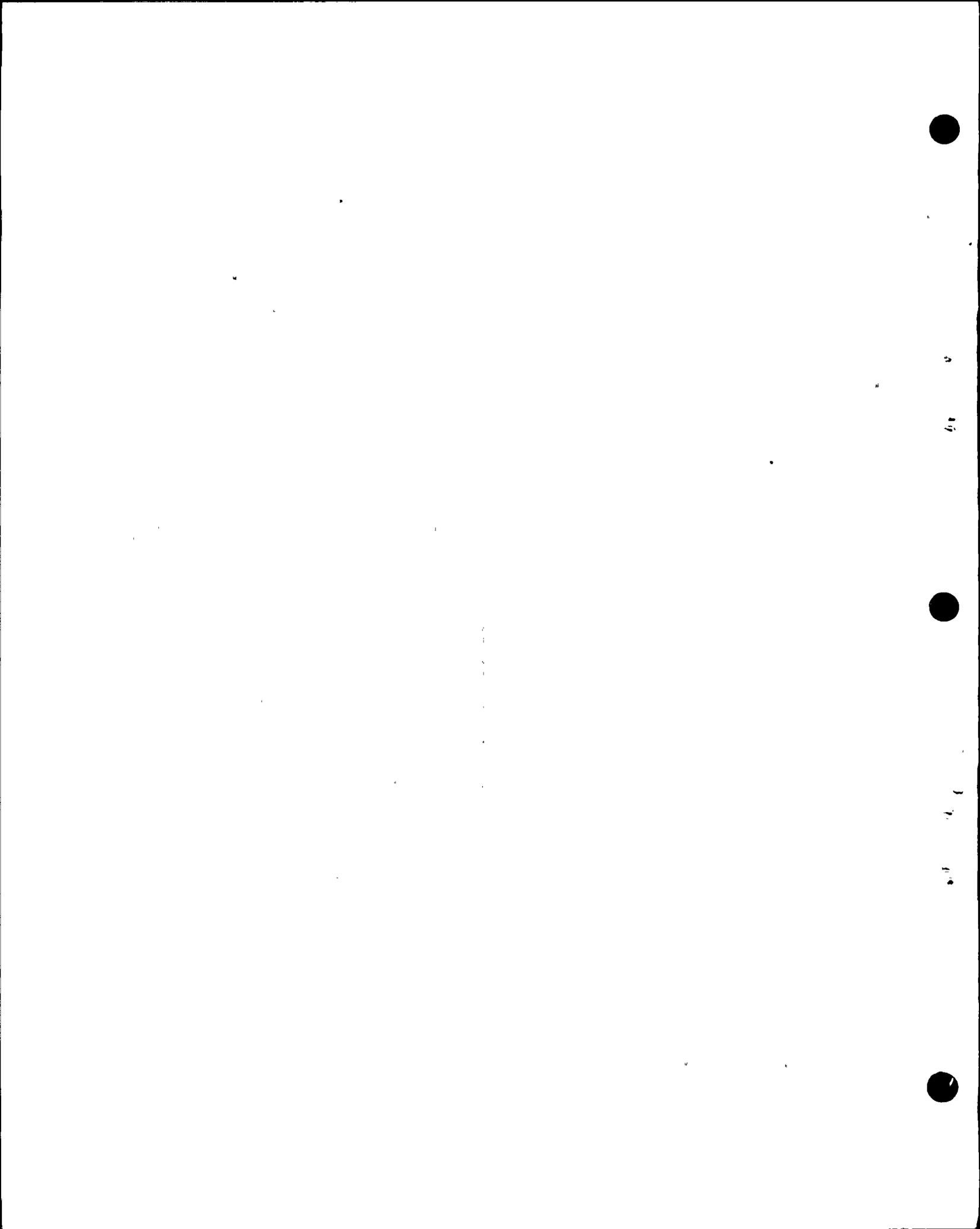
16 Q Mr. Li, could you describe the third test that was
17 used?

18 A (Witness Li) We core drilled spacements for the six
19 piers involved for the modification. We made two samples for
20 each pier. The test method is just like in a cylinder test.

21 Q Mr. Ghio, can you explain the third test?

22 A (Witness Ghio) The third test he alluded to
23 represented core -- c-o-r-e -- samples drilled, removed from
24 the existing columns, piers, of the turbine pedestal.

25 These cylinders are removed and tested in a



wel 9

1 compression test machine similar to that, or perhaps identical
2 to that that was used in testing cylinders cast at the time
3 a concrete structure is originally poured.

4 It's basically the same thing, except we removed
5 material that was in place, originally placed, in the piers.

6 Q What was the average compressive strength of these
7 cores?

8 A Just a moment.

9 A (Witness Williams) Approximately 5200 psi.

10 Q And how does that correlate to the 6000 psi?

11 A There's very good research data available which
12 shows the correlation between code values and an equivalent
13 design compressive strength.

14 In the process of coring you get micro-cracking
15 developed in the core samples, which reduces its strength.
16 And if you apply the relationship between code values and
17 cylinder strength values, it comes out about 6500.

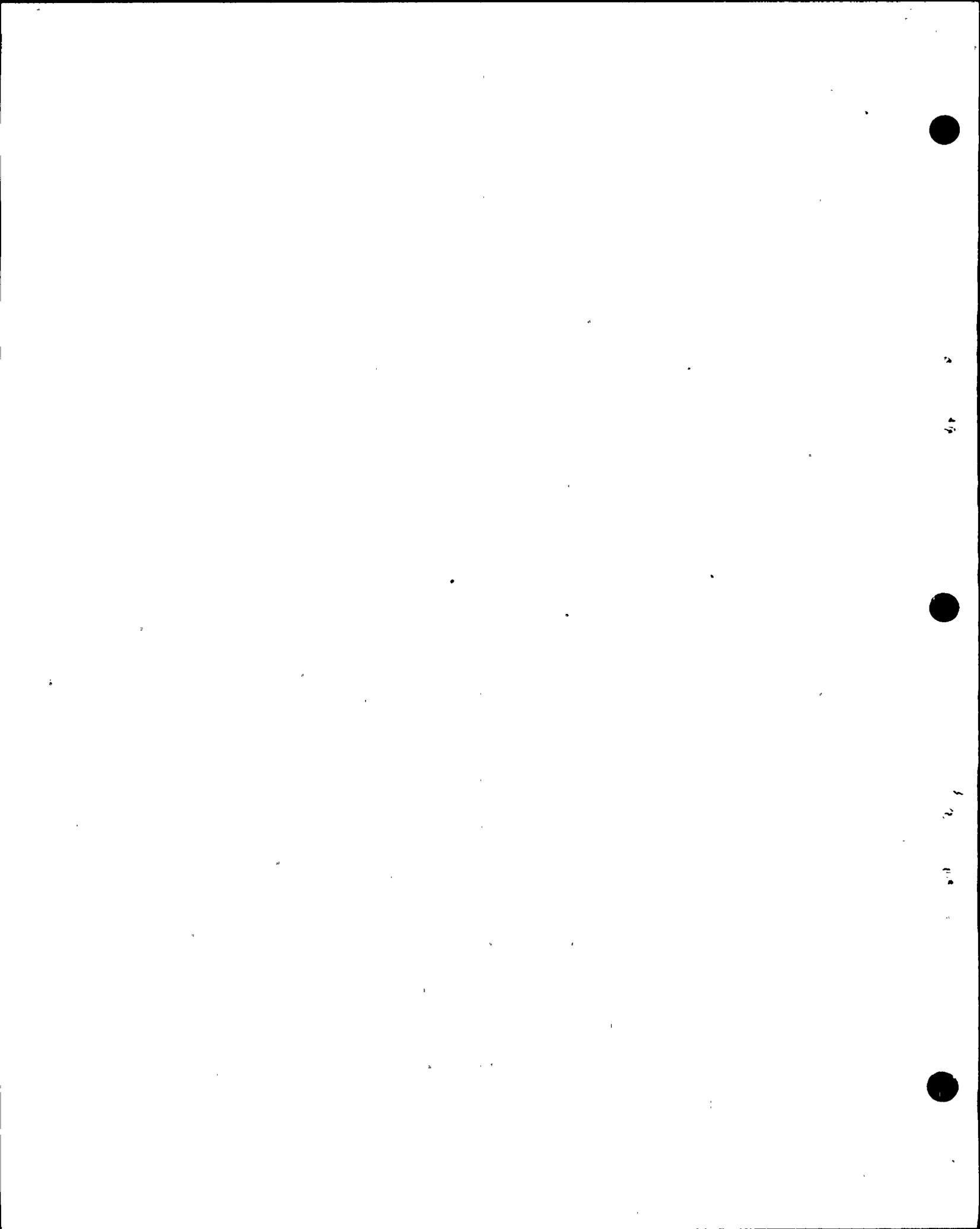
18 Q Do you have any references of codes or standards
19 that have that?

20 A I have reference to research in various parts of
21 the world.

22 Q What would those be?

23 A (Witness Ghio) I believe that the references that
24 he's citing are in a --

25 A (Witness Williams) They're in the turbine pedestal



1 report that was submitted to NRC.

2 MR. NORTON: Yes, in the turbine pedestal report.

3 BY MR. KRISTOVICH:

4 Q Mr. Williams, we have the report that we were given
5 yesterday, and on page 11 there are a list of 10 references.

6 Are you familiar with this?

7 A (Witness Williams) Yes.

8 Q Which of the ten references --

9 A I think 8 and 9. Maybe you'd better give them to
10 me.

11 Q Page 11.

12 A I have it now. Yes, 8 and 9.

13 Q Mr. Ghio, with regard to turbine pedestal modifi-
14 cations, what are Dywidag couplers? It may be Duwidag. It's
15 spelled both ways. It's either Dwydag or --

16 A I can't -- excuse me.

17 Q It is either D-y-w-i-d-a-g or D-u-w-i-d-a-g.

18 A I can't tell you which is the correct spelling.

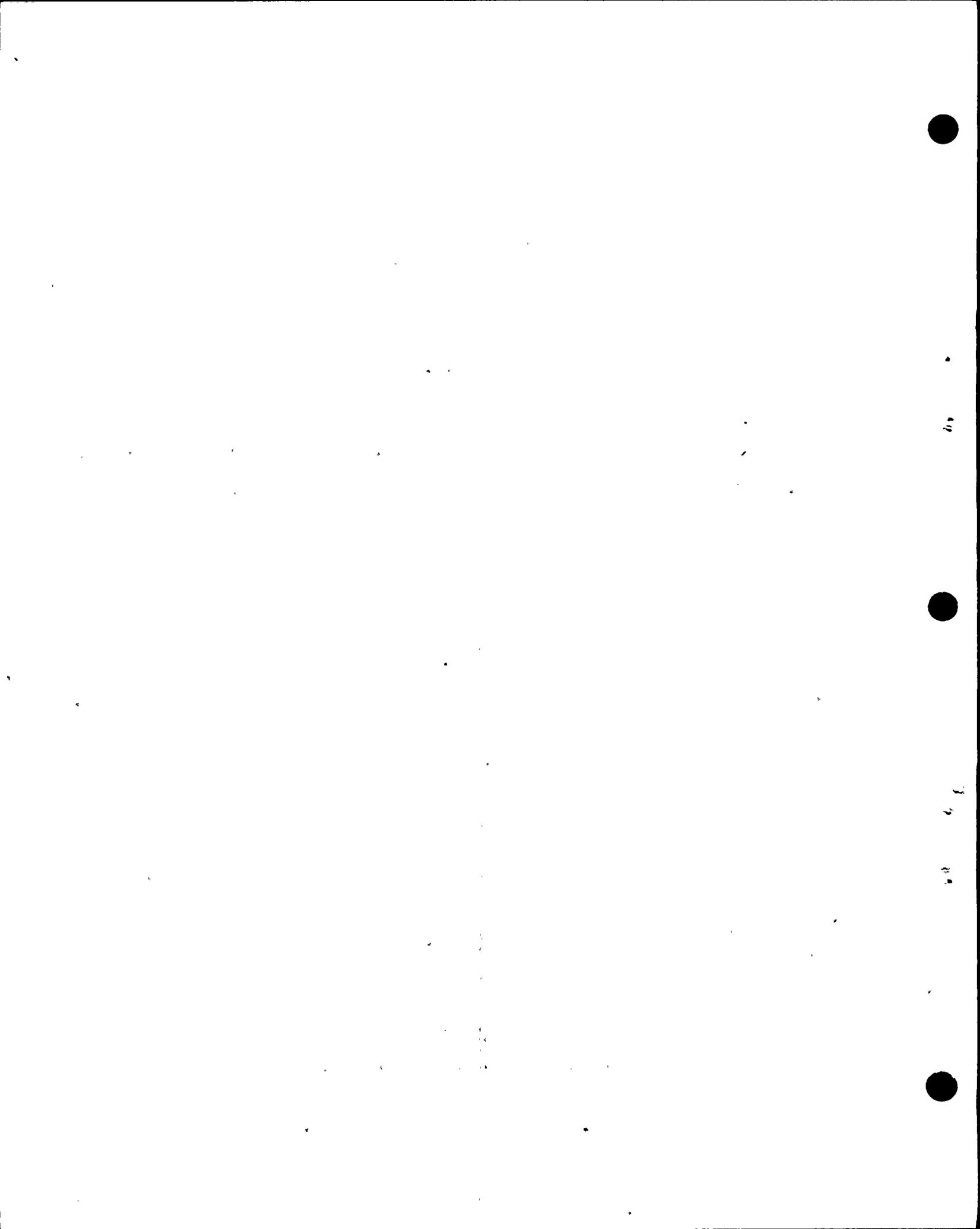
19 I think the correct pronunciation is Duwydag.

20 Q Okay. Well, could you explain what they are?

21 A They're basically a device to couple reinforcing
22 bars together that were used as anchors in the modifications
23 to the turbine pedestal.

24 Excuse me. I stand corrected.

25 A (Witness Li) We are not using Duwidag method,



1 system. We are using VSL table.

2 A (Witness Ghio) The Duwidag system was one altern-
3 ative that we had considered at one time.

4 I forgot that we didn't implement that one.

5 MR. KRISTOVICH: No further questions.

6 MRS. BOWERS: Staff, Mr. Ketchen?

7 MR. KETCHEN: One moment, Mrs. Bowers.

8 (Pause.)

9 MRS. BOWERS: Mr. Ketchen, it's a little early, but
10 we could take a ten-minute recess, if you think that's
11 appropriate.

12 MR. KETCHEN: I don't think so. I think just a
13 couple of minutes.

14 (Pause.)

15 MR. KETCHEN: Mrs. Bowers, the Staff doesn't have
16 any questions of this panel.

17 EXAMINATION BY THE BOARD

18 BY MR. BRIGHT:

19 Q My only problem is in Table 1, and I'm just not
20 clear as to what we're displaying.

21 Maybe we could go back and you could tell me just
22 how did these numbers come about, the maximum stress or
23 load and the allowable stress or load.

24 A (Witness Lang) The maximum stress or load is that
25 stress that's calculated in that particular member as the



1 result of our analysis, and that's described in the
 2 testimony.

3 The allowable stress is that stress that is
 4 calculated based on the average material strength of the
 5 concrete or the steel, and the design code allowable formulas
 6 listed in the AISC, ACI or the Structural Engineer's
 7 Association of California codes.

8 Q What's the criteria -- I think I understand what
 9 you did -- what criteria are placed on this allowable stress
 10 or load? Is that the business of you'll remain in the elastic
 11 region?

12 A That's correct. All these are based on elastic
 13 stresses.

14 I want to mention that this is the highest stress
 15 of each particular type of member.

16 MR. BRIGHT: Fine. Thank you.

17 BY MRS. BOWERS:

18 Q I want to ask a question that's bothered me for
 19 a number of years. I spent 11-some years with the Corps of
 20 Engineers, of course involved in construction contracts, and
 21 I was also involved with the construction of Dulles Airport
 22 for FAA.

23 When you take cores from in-place concrete, like
 24 the turbine pedestal here, what then do you do to replace
 25 that concrete? You don't leave the hole.



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1 A (Witness L1) It will be filled with concrete
2 according to approved methods.

3 Q Well, but is it replaced with concrete of equal
4 strength?

5 A Yes.

6 Q I think you testified there was something like
7 20 cores from the pedestal.

8 A Or greater.

9 Q Greater?

10 A Right.

11 Q So am I correct that the purpose is to try to
12 reestablish the pedestal concrete as it was before the core
13 operation?

14 A (Witness Ghio) Yes, Mrs. Sowers, that's the basic
15 intent. Although we feel we've taken a sufficient number of
16 cores to provide us good data for the analysis, they do in
17 fact represent a rather insignificant amount of the mass of
18 the total structure here. These columns we're talking about
19 are of the order of 10 feet by 14 feet in cross-sectional
20 dimension.

21 In any event, we do replace the material removed
22 with a material that is of equivalent or greater strength.

23 A (Witness Blume) Perhaps Mrs. Sowers is worried
24 about the bond of the new to the old. There are methods
25 employed which ensure perfect bond between the plugged-in



wel 14

1 concrete and the old matrix concrete; namely, pre-wetting the
2 materials and then coating with cement, and then, finally,
3 pushing in the new material under pressure.

4 So there's perfect bond, and it winds up as good
5 a structure if not better than it was before.

6 Q The panel yesterday -- of course, some of you are
7 repeats -- talked about various types of concrete. But now
8 one specification that the Army Corps of Engineers used is
9 to specify the slump. Is that correct?

10 A (Witness Blume nodding affirmatively.)

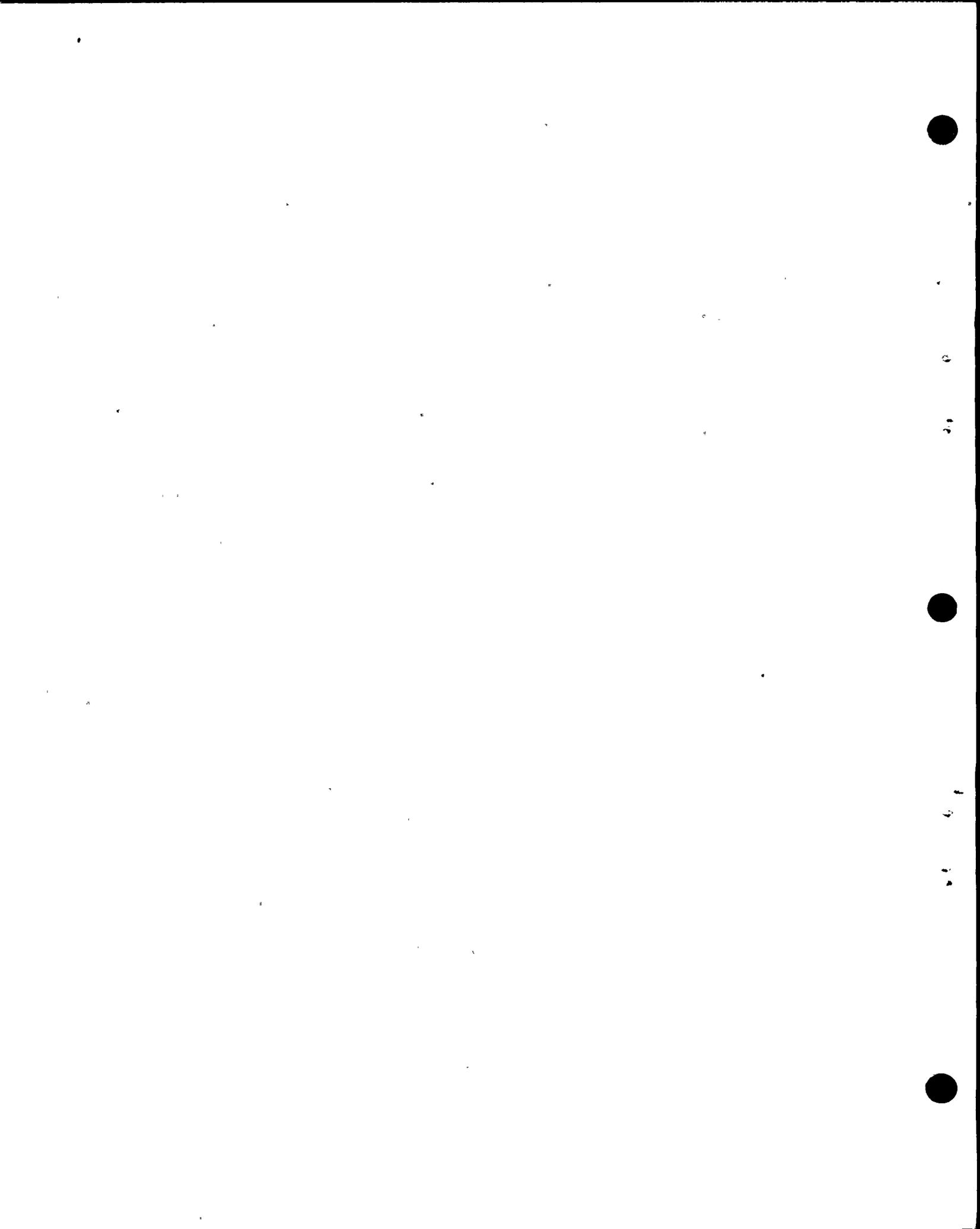
11 Q And of course they try to have it as low as
12 possible, and contractors try to have it as high as possible
13 because it's easier to work.

14 Was that part of the specification here?

15 A (Witness Ghio) Yes. Slump requirements would
16 have been one of the parameters in the specifications for
17 procurement of the concrete. You have to meet various
18 constraints. The slump relates to the workability of the
19 mix, and it has some relationship to its strength. And you
20 have to consider what type of structure the material is
21 going to be placed in.

22 You can't have too stiff a mix in some configura-
23 tions. In any event, we did use slump as one of the
24 specified parameters.

25 MRS. BOWERS: The Board has no further questions.



1 Let me check with the parties:

2 Mr. Norton?

3 CROSS-EXAMINATION ON BOARD QUESTIONS

4 BY MR. NORTON:

5 Q Dr. Blume, I would like to talk a little bit about
6 this phrase, "code allowables" that we've been hearing about
7 in discussion of all of the buildings so far in the analyses,
8 and the use of actual material strengths, and so on and so
9 forth.

10 First of all, when we talk about codes or code
11 allowables, what codes are we talking about? I heard Mr.
12 Lang use a term "design code."

13 What codes are we talking about?

14 A (Witness Blume) I think there's been a little
15 confusion in general, and I'm glad to get a chance to try to
16 clarify it.

17 There are various materials standards in the
18 United States and elsewhere which specify how each material
19 should be used in practice, including design.

20 Now, for example, we have the ACI, or American
21 Concrete Institute, which sets forth standards for the use
22 of concrete and the design of concrete.

23 We have the Steel Institutes, and we have brick
24 manufacturers' specifications, and so on.

25 These are not really codes. These are, in my



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1 mind, standards.

2 A code is, in my mind, a legally adopted specifica-
3 tion by some community, city, state or federal, that sets
4 forth what the basic design requirements are for such things
5 as floor loading, wind loading, earthquake loading, and maybe
6 other requirements.

7 Now, in complying with these codes -- so-called
8 codes -- you may reference in ASTM or ACI as a guide as to
9 how you use each material. But all of these materials codes
10 and standards are really not directly applicable to Diablo
11 Canyon, unless and until agreed to or required by NRC.

12 The reason for that is that we are so far above
13 the standards of normal codes that there's no comparison.

14 Q All right. But when we talk about code allowables,
15 for example, there were questions regarding the code allowable
16 of the strength of concrete where you specify, say, 3000 or
17 5000, and then you take 95 percent of that in your analysis.

18 I take it that is used -- that operation, that
19 analysis, is done prior to building the building, is that
20 correct?

21 A That is correct. That's in the design process.

22 Q All right.

23 Now, when you're doing an analysis on a building
24 that has been built, why don't you do that?

25 A Because I think it would be unreasonable if you



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1 have the actual test values of the way it was built, why
2 not use them? Why put in a factor that no longer applies?

3 It's a factor of ignorance, is what it is,
4 because you're ignorant of exactly how the structure is going
5 to come out.

6 Q All right. So when you have the building built,
7 you don't have to use the ignorance, because you have the
8 exact numbers.

9 A You've got the results, that's correct.

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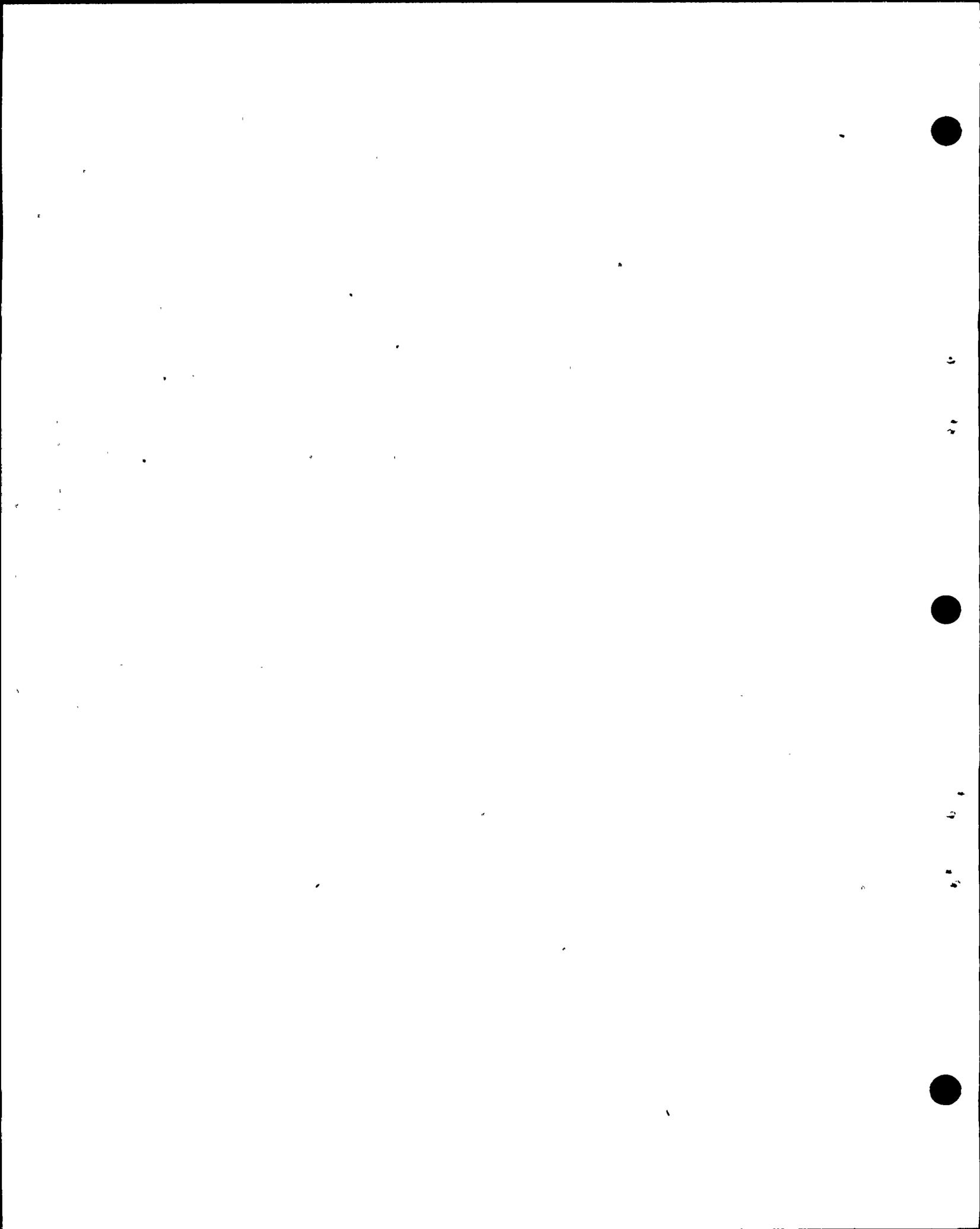
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1 Q All right.

2 And in this case in this analysis of these build-
3 ings you used, then, what structures actually were as opposed
4 to what they might be if you were specifying them to be built
5 in the future?

6 A That's the way it should have been done in my
7 opinion. The only exception is the one mentioned, I guess, by
8 Ralph Yokoyama, that if you're designing a new structure, such
9 as a buttress to a turbine building, then you use this 90 per-
10 cent factor, according to conventional practice.

11 Q All right.

12 Let me ask one final thing:

13 In your professional opinion, then, is the analy-
14 sis that was done using actual material strengths, average
15 actual material strengths, acceptable practice in the engineer-
16 ing community?

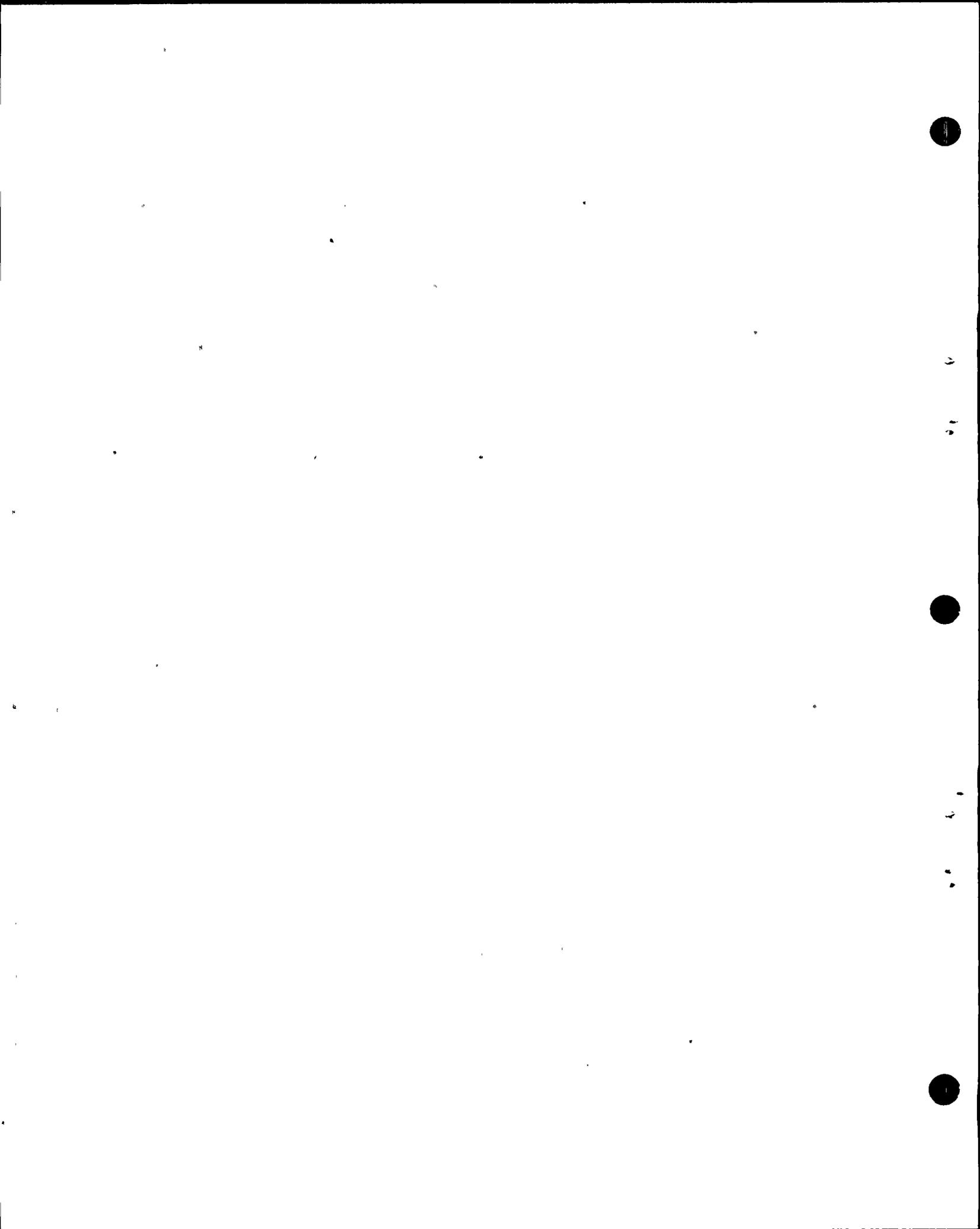
17 A Yes.

18 MR. NORTON: I have nothing further.

19 MRS. BOWERS: Mr. Kristovich?

20
21 BY MR. KRISTOVICH:

22 Q Mr. Lang, directing your attention to Table 1, the
23 fourth column, Allowable Stress or Load, for each of these items
24 what was the capacity reduction factor that was used in deter-
25 mining the allowable stress load?



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1 A (Witness Lang) Well, in general if it's a shear
2 element, a concrete shear wall, a capacity reduction factor of
3 .85 was used. For any bending element in concrete the capa-
4 city reduction factor of .9 was used.

5 Q Was a capacity reduction factor used for each of
6 these items?

7 A Perhaps Mr. Yokoyama can answer that better than
8 I.

9 A (Witness Yokoyama) Yes, every one except for the
10 steel bent columns; and that being steel, there is no capacity
11 reduction factor.

12 Q Dr. Blume, does 50.55A of the regulations apply
13 to codes and standards?

14 A (Witness Blume) Would you repeat that, please?

15 Q Does 50.55A of the regulations apply to codes
16 and standards?

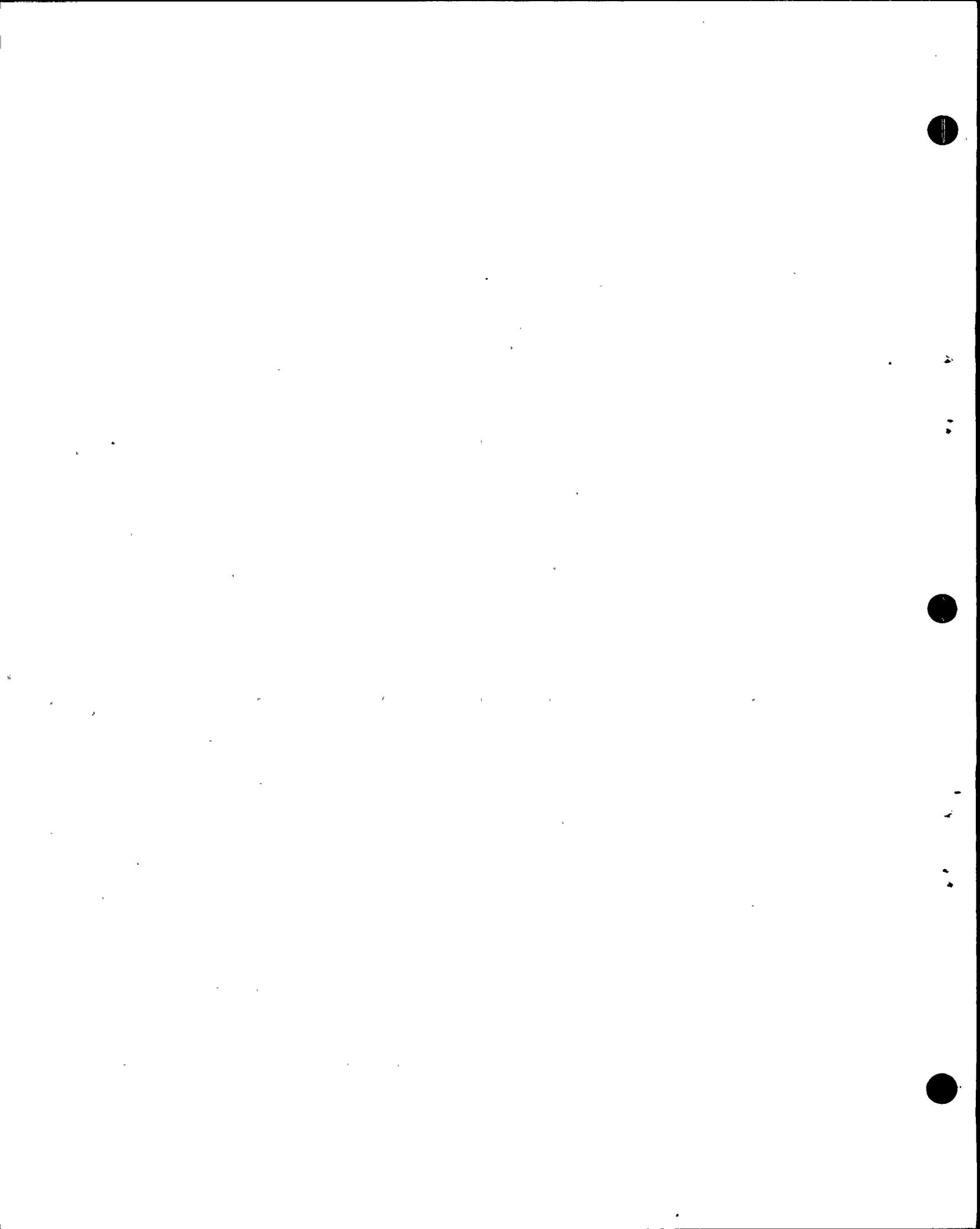
17 A I wouldn't know by number reference. I'll have
18 to refer to someone else, maybe Vince.

19 A (Witness Ghio) I'm sorry, I'm hard pressed to
20 answer that. I'm simply not familiar with what that -- I
21 don't recall at the moment what that verse of the code states.

22 MR. NORTON: Excuse me, Mrs. Bowers.

23 I thought the purpose of recross was to cross on
24 subject matters brought up on redirect.

25 MRS. BOWERS: Or by the Board.



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MR. NORTON: Or by the Board, yes.

I'm not sure what this has to do with any re-
direct.

MR. KRISTOVICH: I believe on redirect we were
talking about codes and standards.

MR. NORTON: Yes. And your question regards
about four pages of the regulations. And I'm not sure --

MR. KRISTOVICH: Dealing with codes and standards.

MR. NORTON: Yes. But I'm not sure what -- it's
not specific at all.

MRS. BOWERS: So you're asking the witnesses
about a code or a standard giving a number, and the number
apparently means nothing to them. They can see the document.

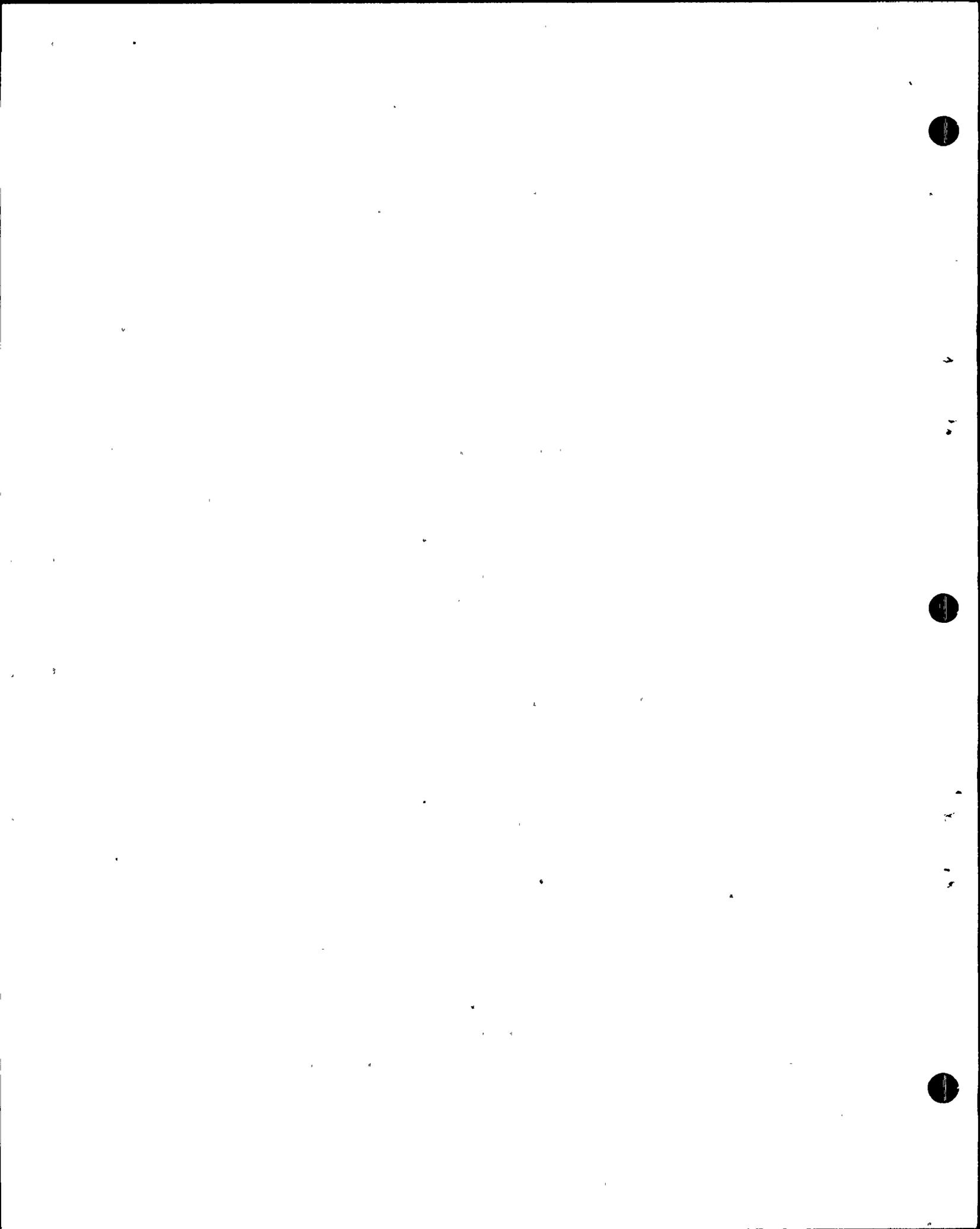
MR. NORTON: Not only that, I think it calls
for a legal conclusion on the part of the witnesses.

If he's asking them to interpret the law, 10 CFR
Part 50 for them, for the attorney, I would object on that
basis, that it calls for a legal conclusion.

MR. KRISTOVICH: Well, Mrs. Bowers, Dr. Blume, in
his responses to Mr. Norton's questions, was trying to separate
codes and standards. And I'm merely referring to Section
50.55A of the regulations, which refers to both codes and
standards.

MRS. BOWERS: Does the Staff have a position.

(Pause.)



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MR. NORTON: Mrs. Bowers, we have no objection to the code speaking for itself. I mean, I don't quite understand the question. The code is the code and it says what it says.

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And I don't know whether he's asking these witnesses what it says or what. If he's asking them what it says, it's four pages long.

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MR. KETCHEN: Mrs. Bowers, if I may respond to your question, I agree with the dialogue that has gone before. I think there are a lot of bases for objections to the question, I think the main one being nonspecific. But I think I agree with Mr. Norton's statement, which I was trying to formulate in my own mind. The code is there and it does speak for itself, and it is four pages long, and it's very detailed and complex.

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And if there is a specific question on it from those pages that can be asked of this panel, I think that should be done by a possible rephrasing of the question. But I think just the broad general question as it stands now is objectionable.

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MR. KRISTOVICH: Well, Mrs. Bowers, Dr. Blume was trying to draw a distinction between codes and standards. I merely wanted to show that Section 50.35A refers to both codes and standards. And I think that's been done.

25

So we have no further questions.



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MR. NORTON: Excuse me, Mrs. Bowers.

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First of all, that's very misleading. 50.55A

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deals with pressure vessels, piping, pump, valves; it doesn't

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deal with concrete structures, which is the subject. Concrete

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and steel structures was the subject matter of this panel.

6

I suggest Counsel read the section himself before

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he starts paraphrasing what it says.

8

MRS. BOWERS: Well, but C, Pressure Vessels; but

9

A, Structures, Systems, Components.

10

MR. NORTON: Well, Mrs. Bowers, if you read it

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it is pressure vessels. If you read it carefully and read it

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through, it does not deal with the subject matter of this

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panel at this time at all.

14

And what I said is it doesn't make any difference

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even if it did, but it doesn't.

16

MR. KRISTOVICH: Mrs. Bowers, I was merely try-

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ing to show that Dr. Blume may have one interpretation of

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codes and standards and intervenors have another. And we are

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willing to move on.

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MRS. BOWERS: Well, then, I really don't think a

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ruling is necessary. It essentially is a withdrawal of the

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question.

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Maybe it's appropriate to take a ten minute break

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at this time.

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(Recess.)



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MRS. BOWERS: We'd like to begin.

Mr. Kristovich, do you have further recross?

MR. KRISTOVICH: No further questions.

MRS. BOWERS: Fine.

Mr. Ketchen?

MR. KETCHEN: No questions.

MRS. BOWERS: Well, the Board has no further questions.

MR. NORTON: All right.

Then I guess we're ready for the next panel.

Mr. Ghio, are we on the intake structure now?

WITNESS GHIO: That's correct.

MR. NORTON: We need Mr. McLaughlin.

(The panel temporarily excused.)

Whereupon,

JOHN A. BLUME,

VINCENT J. GHIO,

DAVID A. LANG,

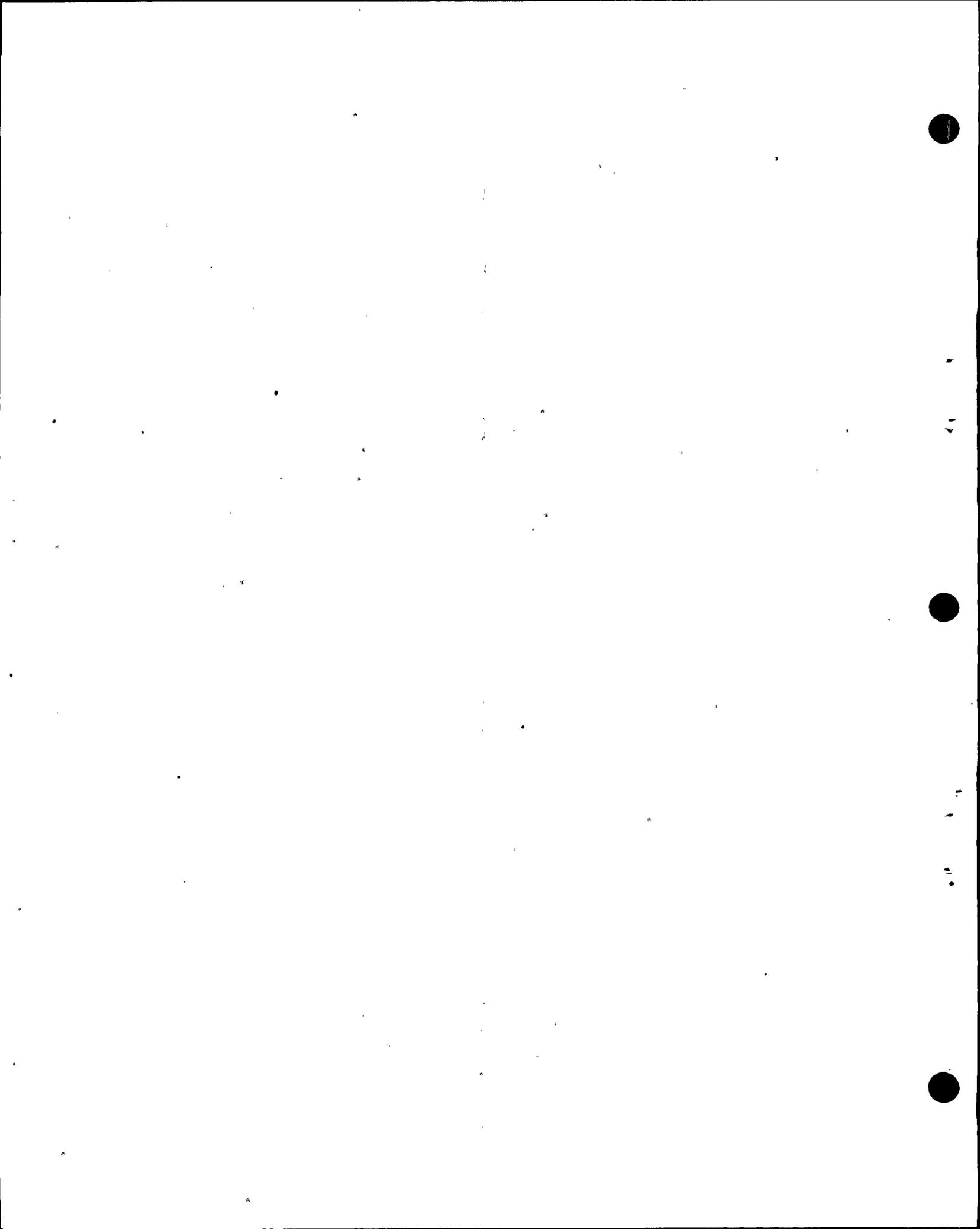
DAVID WILLIAMS,

JOHN A. MC LAUGHLIN,

and

MING E. LEE

resumed the stand as witnesses on behalf of the Applicant, and, having been previously duly sworn, were examined and testified further as follows:



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1 MR. NORTON: Mr. McLaughlin, you were sworn
2 yesterday, I believe.

3 Then for identification, the only persons we're
4 adding are Mr. McLaughlin and Mr. Lee, and that is i-e-e, Mr.
5 Lee.

DIRECT EXAMINATION

BY MR. NORTON:

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8 Q Mr. Ghio, do you have any corrections to make to
9 the direct testimony on the intake structure at this time?

10 A (Witness Ghio) Yes, one minor correction.

11 On page 3, line 21, the word "nonseismic" should
12 read "no seismic".

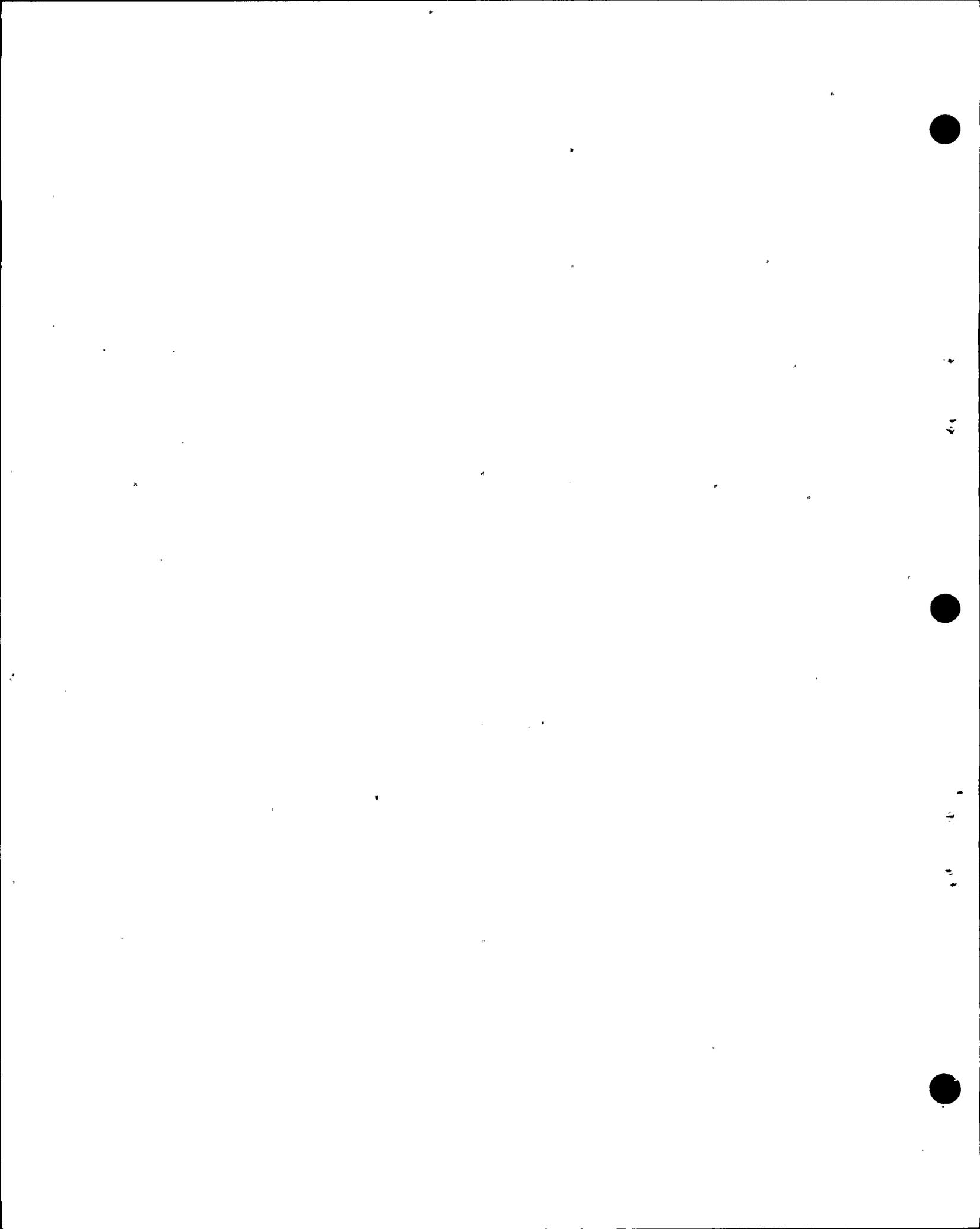
13 Q All right, Mr. Ghio.

14 At this time would you summarize the analysis
15 done on the intake structure?

16 A Yes.

17 The intake structure has been evaluated for both
18 the Blume and the Newmark spectra. After the tau adjustment
19 was performed, the vertical spectra were taken as two-thirds
20 of the horizontal. Seven percent damping and average material
21 properties were used. A fixed base mathematical model using
22 finite element methods was employed in the analysis.

23 Accidental torsion, in addition to the geometric
24 torsion, was considered in the analysis. The stresses obtained
25 from the torsional analysis were added absolutely to the



mpb3

1 results of the translational analysis. Stresses were computed
2 for all significant force resisting elements of the structure.

3 There are tables, or a table appended to the
4 testimony that summarizes the stress results. The only ele-
5 ments in the structure that required ductility were the walls
6 and the front of the structure. An analysis was made to
7 determine the ductility requirements of these walls, and the
8 ductility factor obtained was within the specified limits.

9 In addition, an analysis was performed which
10 considered the mass of these walls contributing to the genera-
11 tion of seismic loads, while at the same time offering no
12 seismic resistance.

13 This analysis showed all stresses in the structure
14 to be within allowable limits.

15 Stability analyses of the structure were performed
16 and resulted in satisfactory factors of safety for stability.
17 Bearing pressures at the seaward side of the structure were
18 calculated, and all results were within the allowables.

19 The testimony concludes with the statement that
20 the intake structure with no modification is capable of with-
21 standing the Hogri earthquake without sustaining damage that
22 would impair the functioning of the design Class 1 auxiliary
23 saltwater pumps.

24 That concludes my summary.

25 Q All right.



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2 Mr. Ghio, I believe the day we adjourned the
3 last session you had testified a little bit about the intake
4 structure and you had testified, if I'm not mistaken, that
5 there would be some spalling theoretically upon the analysis
6 at the curtain of the intake structure.

7 Would you explain that a little bit more in
8 detail at this time?

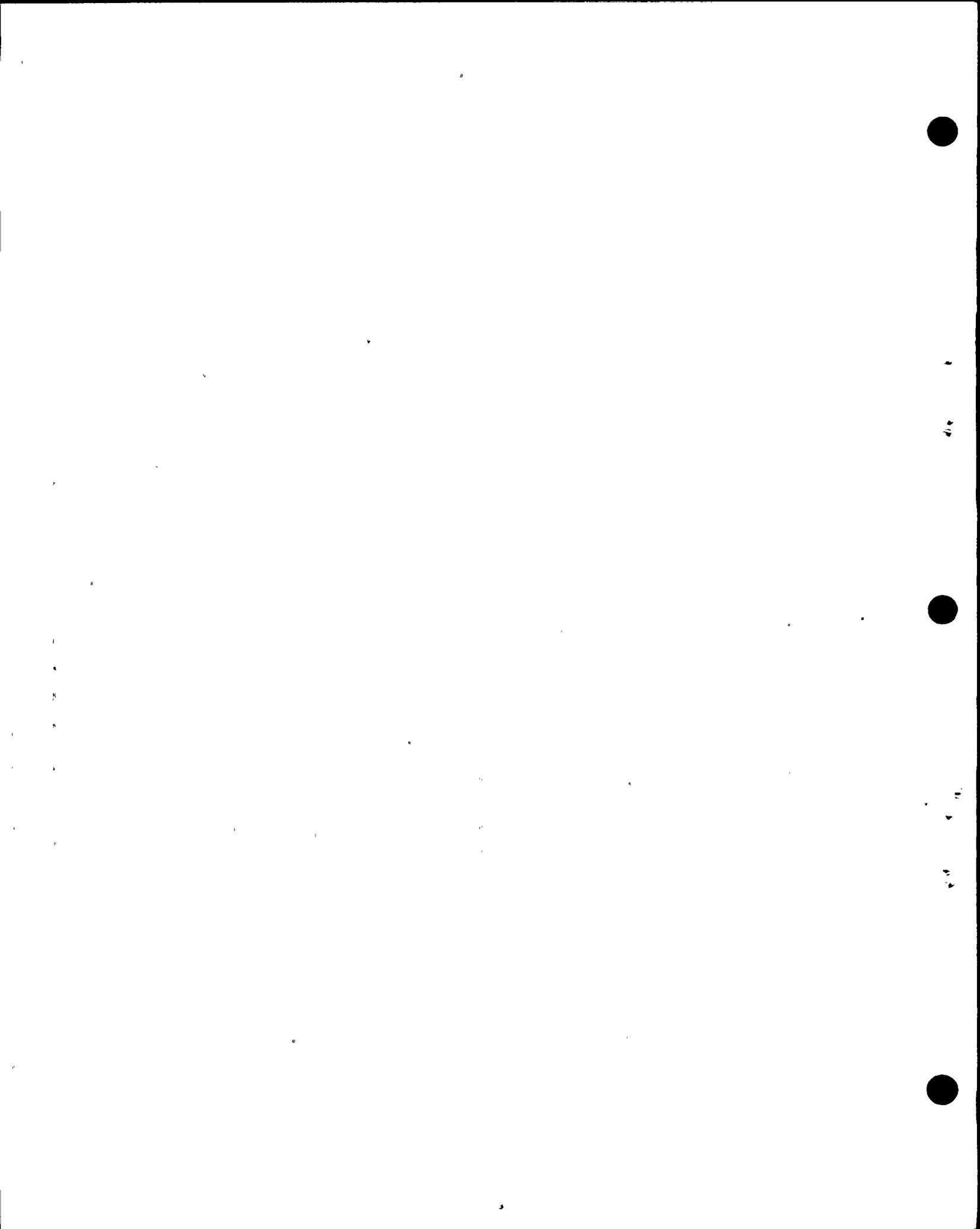
9 A Yes.

10 I think the question was what would be the
11 consequences, or what is an interpretation of the results of
12 the analysis involving these front walls of the structure, and
13 I indicated that one could interpret it to represent the
14 possibility of some minor cracking and spalling of concrete.

15 I was asked to define what spalling of concrete
16 represented, and I believe I indicated and would still indi-
17 cate that in my view it represents relatively small pieces of
18 concrete located outside or beyond the curtain of reinforcing
19 steel in these piers dropping to the invert of the structure
20 with no resulting damage to any equipment or no blockage of
21 the waterways that are required to deliver the water demand
22 to the auxiliary saltwater system.

23 Q All right.

24 When you say "drop to the invert of the structure",
25 it doesn't mean anything to me. Maybe it doesn't mean any-
thing to somebody else. So what do you mean?



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A Okay.

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The invert of the structure is the floor of the structure.

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Q All right.

5

So in your opinion, then, any spalling or cracking of concrete that would take place would in no way affect the operation of the intake structure, is that correct?

7

8

A That's correct. It would in no way interfere with or disable function of the auxiliary saltwater pumps that are contained within the structure, nor would it damage the structure.

9

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Q Let me ask: Do all members of this panel adopt this testimony on the intake structure as their own, and if not, please indicate so.

13

14

15

(No response.)

16

Let the record show that there is no response from the panel.

17

18

MR. NORTON: At this time, Mrs. Bowers, we would ask that the testimony regarding the Hosgri Analysis and the Evaluation of the Intake Structure be placed in the record as though read.

19

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MRS. BOWERS: Mr. Kristovich?

23

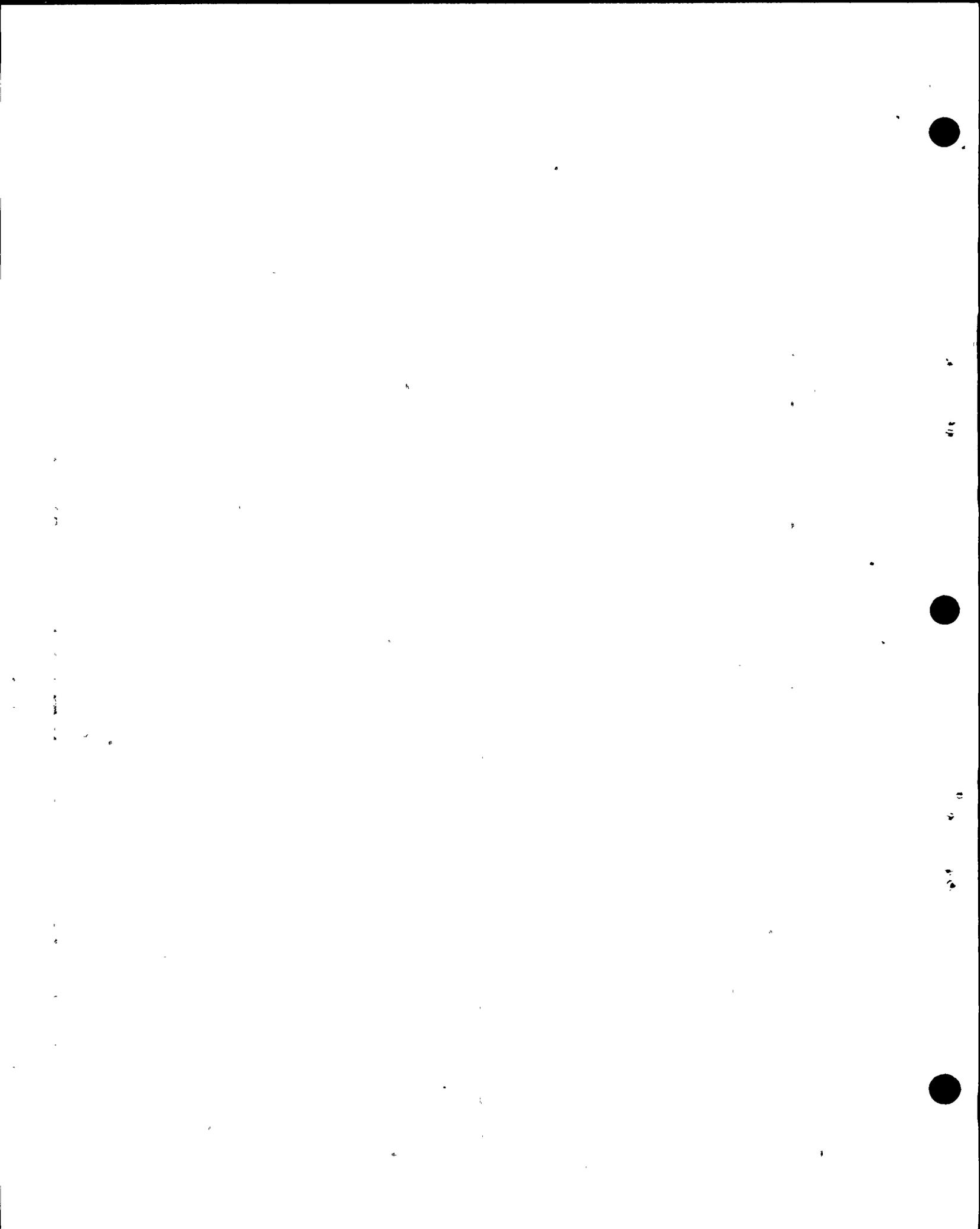
MR. KRISTOVICH: No objection.

24

MRS. BOWERS: Mr. Ketchen?

25

MR. KETCHEN: No objection.



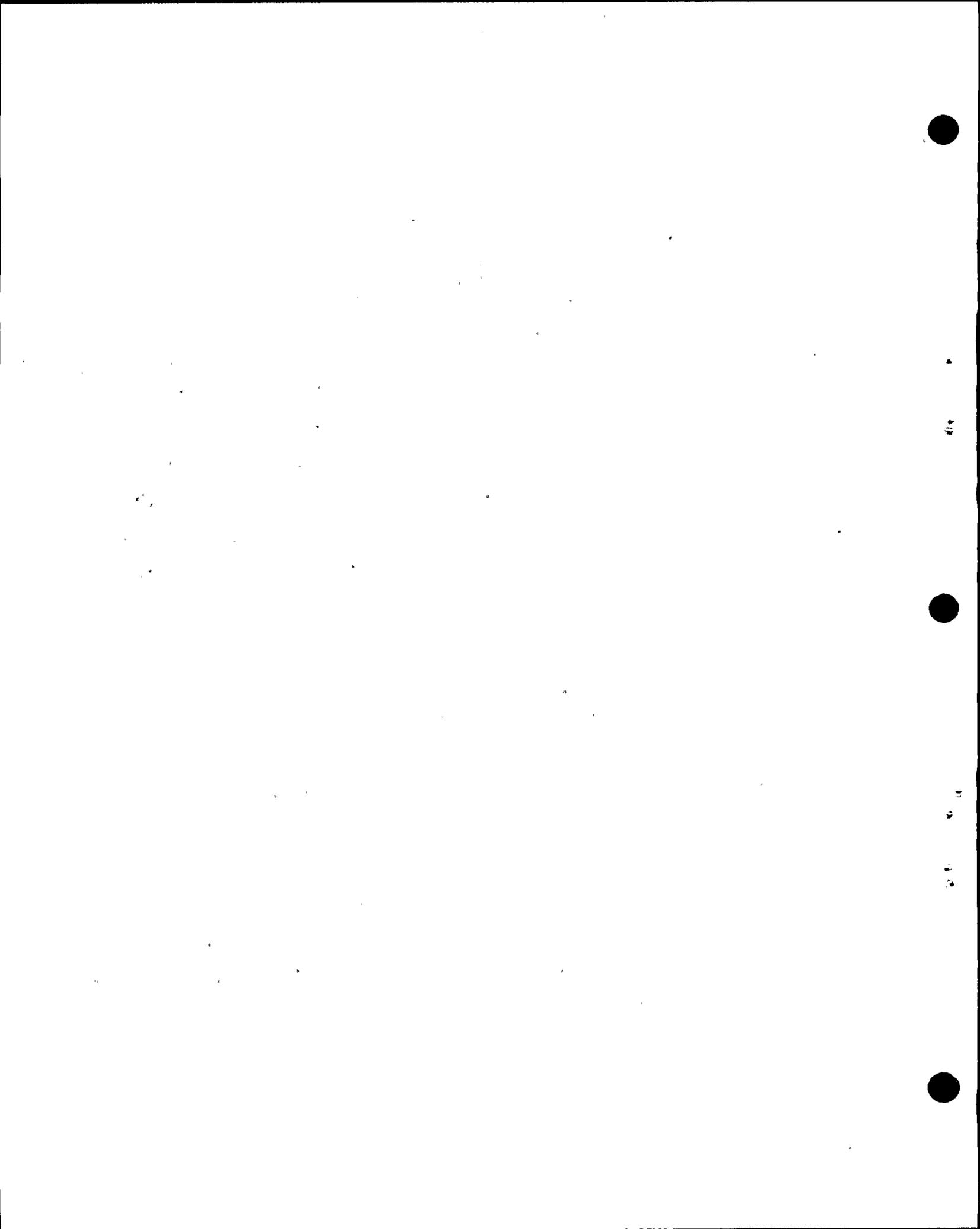
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MRS. BOWERS: Well, the testimony you've identified will be physically incorporated into the transcript as though read.

(The Hosgri Analysis and Evaluation of the Intake Structure follows:)





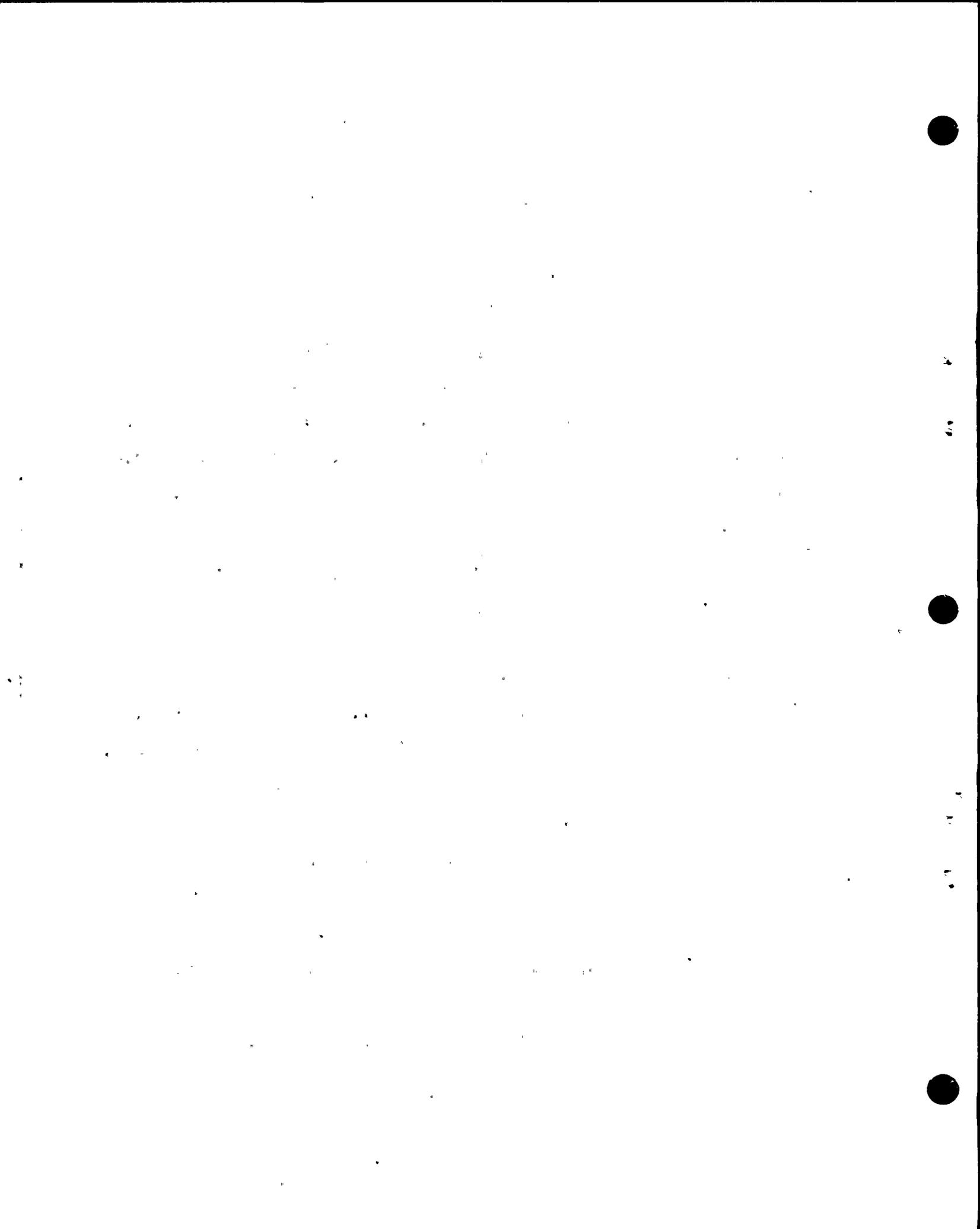
1 TESTIMONY OF
2 VINCENT J. GHIO
3 AND
4 DAVID LANG
5 ON BEHALF OF
6 PACIFIC GAS AND ELECTRIC COMPANY
7 DECEMBER 4, 1978
8 DOCKET NOS. 50-275, 50-323

9 HOSGRI ANALYSIS AND EVALUATION OF THE INTAKE STRUCTURE

10 The horizontal seismic inputs for the Intake
11 Structure corresponded to the Blume and Newmark response
12 spectra. These spectra were developed independently and
13 adjusted for spatial averaging of accelerations to make them
14 structure-specific. The seismic input for the structure in
15 the vertical direction corresponded to the Newmark free-field
16 spectrum, scaled by two-thirds. This spectrum exceeds the
17 corresponding Blume spectrum virtually everywhere.

18 Damping of 7% was used in the Hosgri analysis.
19 The concrete strength corresponded to the average cylinder
20 strength of samples used in the construction of the structure.
21 The average test value yield strength was used for the
22 reinforcing steel in the structure.

23 A fixed-base mathematical model using finite
24 element methods was used for the analysis. The floor slabs
25 and most vertical walls were modeled as flat-plate elements
26 to include both membrane (in-plane) and bending (out-of-plane)
behavior. Some thick shear walls near the center of the
structure was modeled as three-dimensional solid elements.

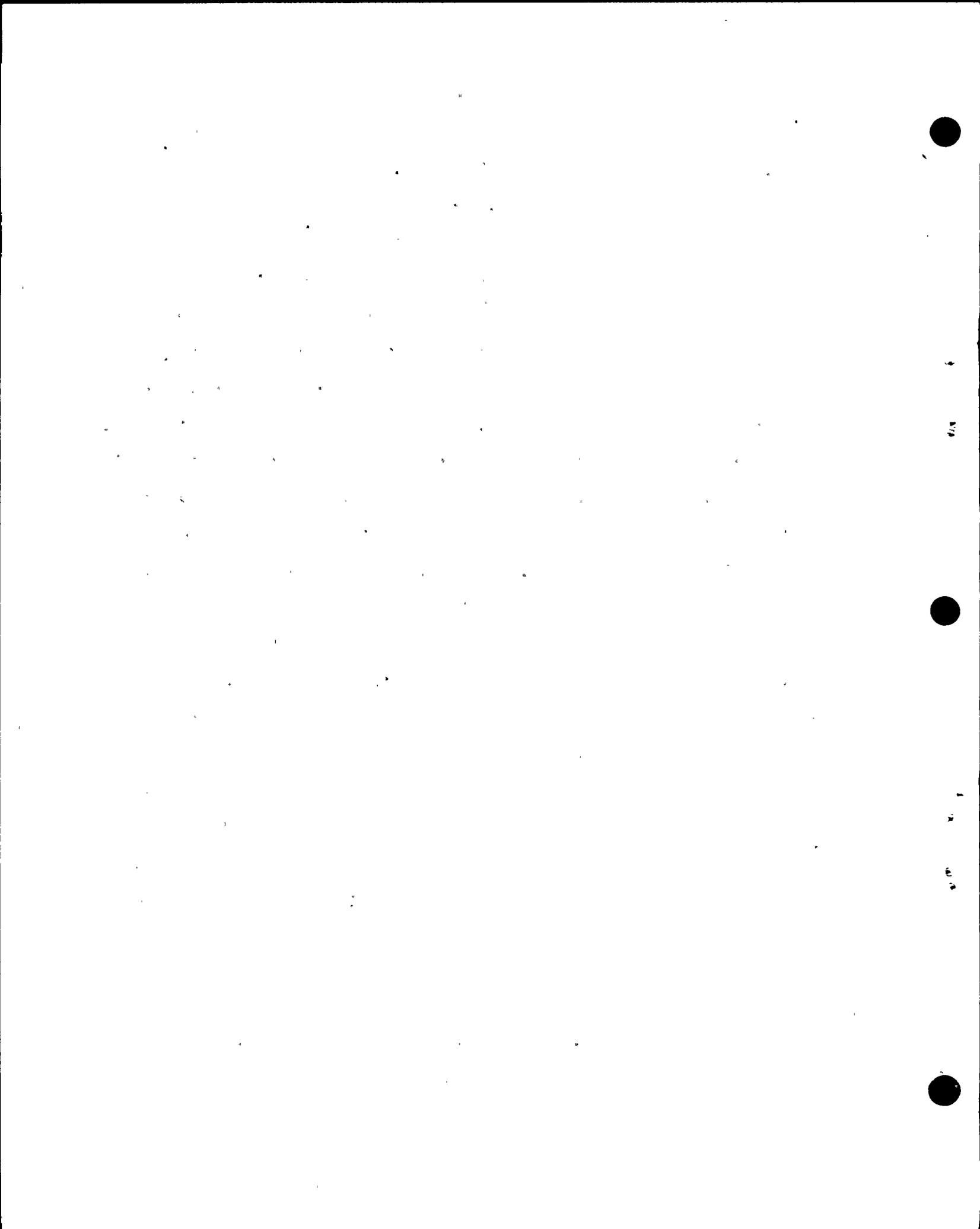


1 For the analysis of the structure due to an earth-
2 quake in the north-south, or long direction, the total mass
3 of water contained within the structure was included as part
4 of the mass of the structure. In other words, it was assumed
5 that no water would flow into or out of the structure during
6 the north-south earthquake motion. In addition a high-tide
7 condition was used thus maximizing the total water mass
8 within the structure. For the analysis due to the east-west
9 direction earthquake motions it was assumed that water could
10 flow freely through the intake openings and would impart
11 relatively little additional mass to the structure.

12 Accidental torsion, in addition to geometric
13 torsion, was considered in the analysis. The stresses
14 obtained from the torsional analysis were added absolutely
15 to the results of the corresponding translational analysis.

16 Shear stresses and bending moments were computed
17 for all significant force-resisting elements of the structure.
18 Table 1 shows the shear stresses compared to allowable shear
19 stresses for representative elements resulting from an
20 earthquake in the east-west direction. All stresses were
21 well within the capacity of the concrete alone - no contri-
22 bution from reinforcing steel was required. Bending moments
23 were also small, typical of low, massive concrete structures.

24 Table 2 shows shear stresses for representative
25 elements of the structure subjected to the north-south
26 earthquake. With the exception of the lower center pier



1 wall, all stresses were within, and most substantially
2 within, allowable stresses. All calculated stresses include
3 the American Concrete Institute capacity reduction factor,
4 $\phi = 0.85$, which represents an additional safety factor.

5 Table 3 lists the bending moments for representative
6 walls subjected to the north-south earthquake. The only
7 walls with calculated bending moments exceeding the allowable
8 are the flow straightener walls at the front of the structure.
9 These walls are subject to moments resulting from a combination
10 of the deflection of the seaward wall above and the forces
11 of the mass of water contained between the walls. Again,
12 the allowable moment includes the American Concrete Institute
13 capacity reduction factor, in this case $\phi = 0.90$.

14 An analysis was made to determine the ductility
15 requirements of the flow straightener walls, using the
16 computed elastic displacement of the wall as the maximum
17 total displacement. The ductility factor obtained was
18 within the specified limits. In addition an analysis was
19 performed which considered the mass of these walls contrib-
20 uting to the generation of seismic loads while at the same
21 time offering nonseismic resistance. This analysis showed
22 all stresses in the structure to be within allowable limits.

23 Stability analyses of the Intake Structure were
24 performed for the purpose of calculating factors of safety
25 against overturning and sliding. Forces acting on the
26 structure included the combination of seismic forces of the



11/18/81



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1 structure and the static and dynamic lateral forces from the
2 surrounding backfill. The resisting force due to the weight
3 of the structure included the deduction for the buoyant
4 force of the contained water. All analyses resulted in
5 satisfactory factors of safety for stability.

6 The maximum bearing pressures at the seaward side
7 of the structure were calculated and used to analyze the
8 slabs, grade beams and walls resisting those pressures. All
9 elements were found to be within allowable stresses.

10 In conclusion the intake structure, with no modi-
11 fication, is capable of withstanding the Hosgri earthquake
12 without sustaining damage that would impair the functioning
13 of the Design Class I auxiliary saltwater pumps.

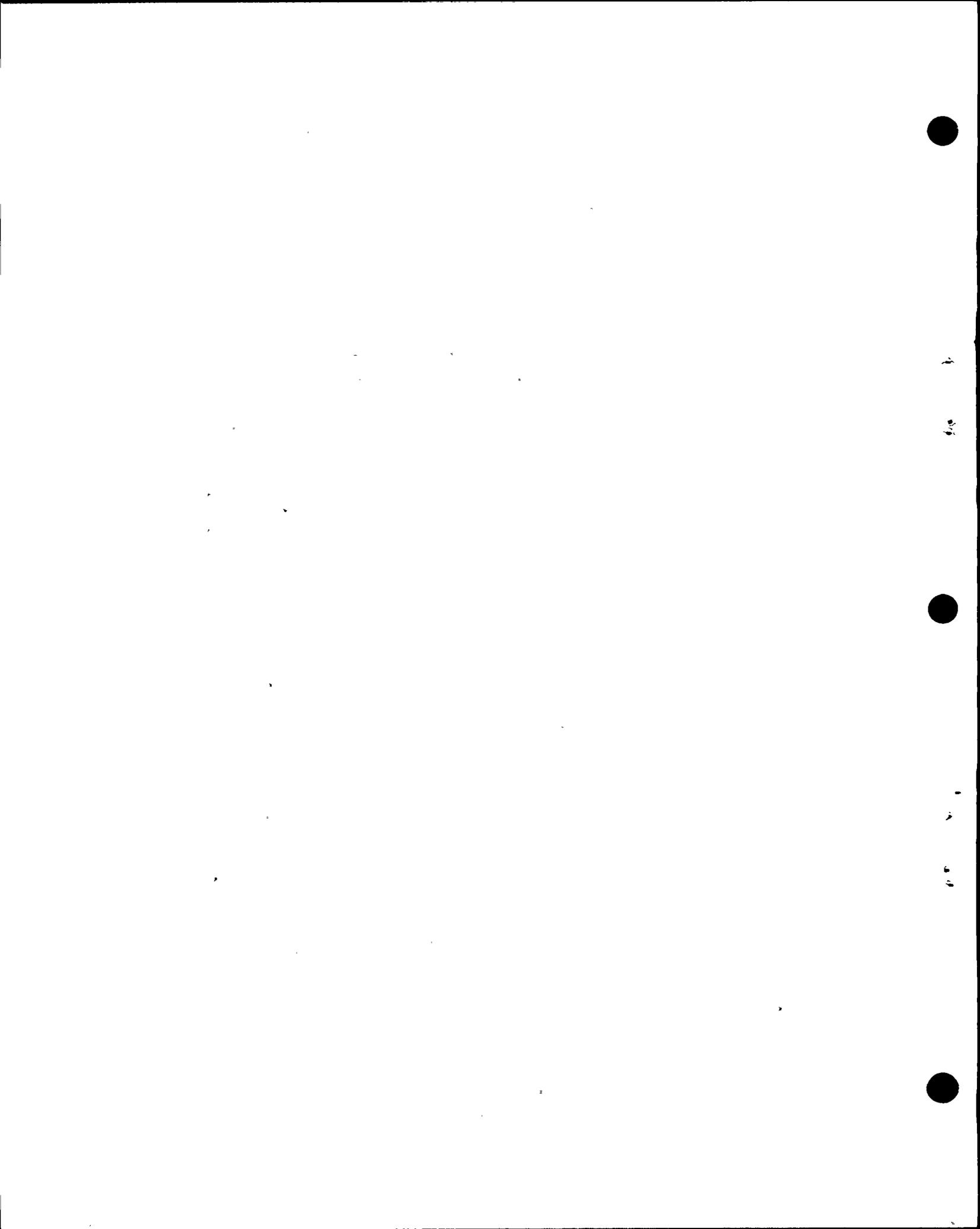


TABLE 1
INTAKE STRUCTURE
MAXIMUM SHEAR STRESS,
EAST-WEST EARTHQUAKE

Element	Shear Stress* (psi)	Allowable Shear Stress** (psi)
Upper Walls		
North wall	30	120
Flow straightener	33	120
Auxiliary pump wall	61	120
Lower Walls		
End wall	35	120
Flow straightener	39	120
Pedestal	39	120

* Includes $\phi = 0.85$

** Nominal capacity of concrete = 120 psi.
Capacity of reinforcing steel included as required.

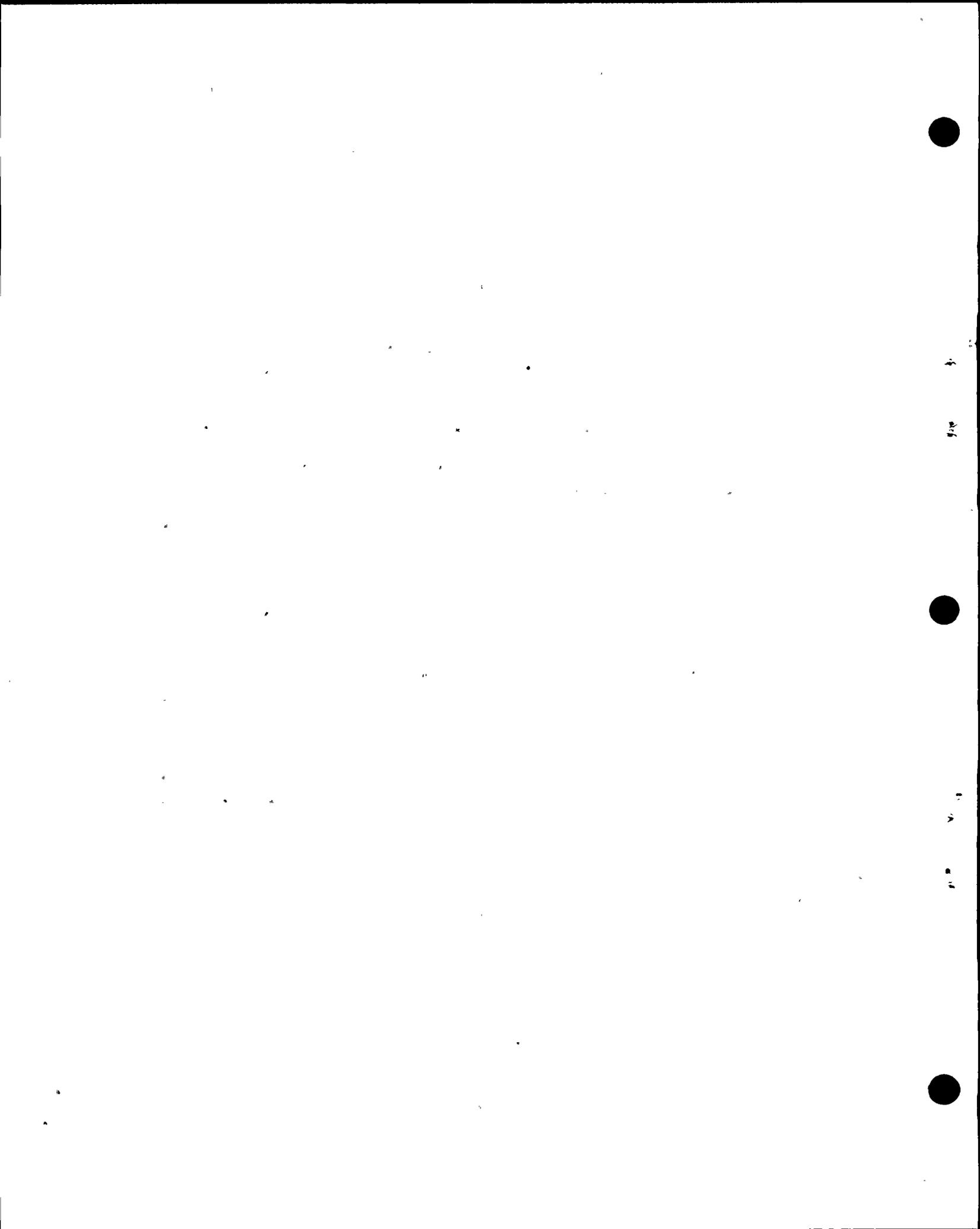
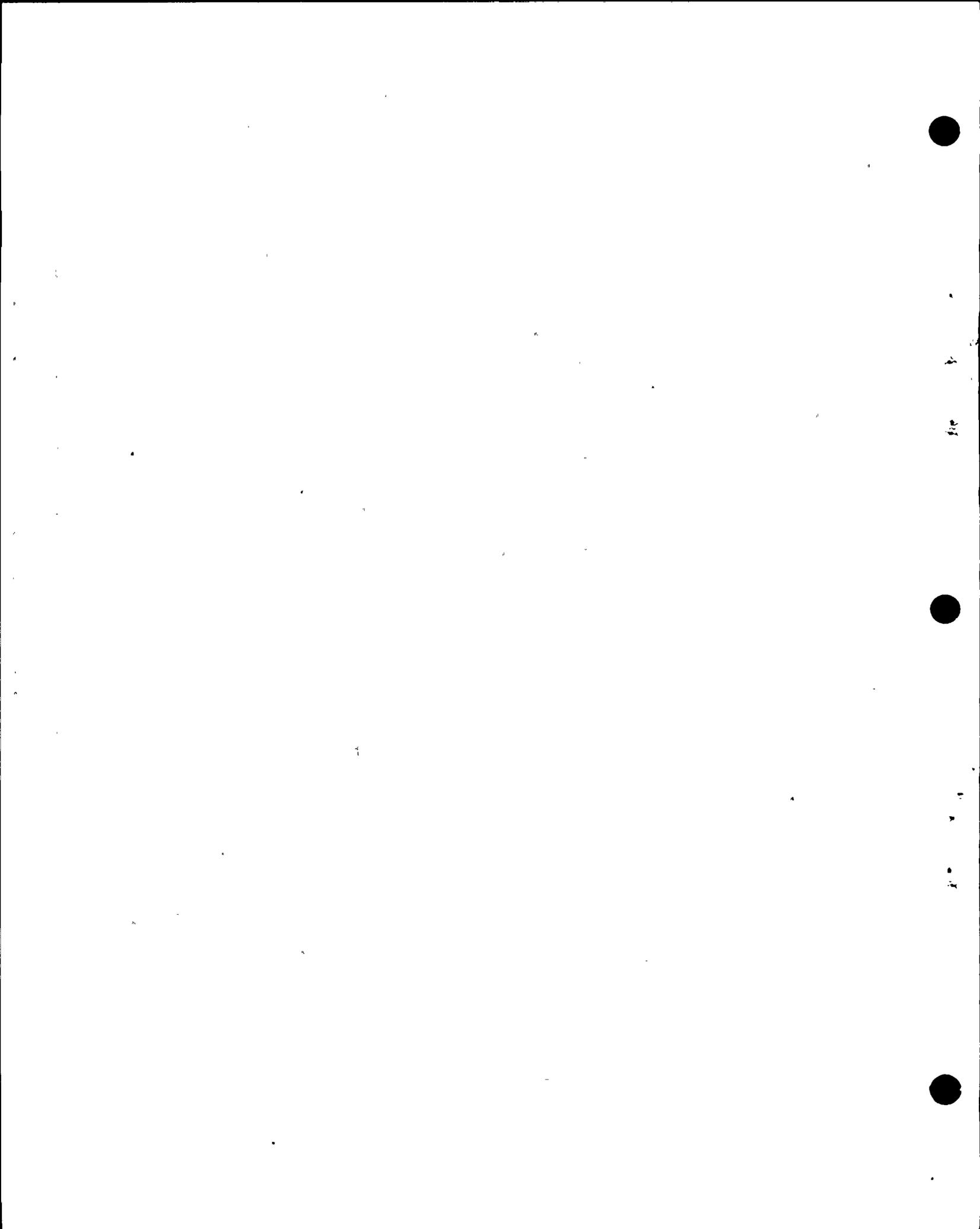


TABLE 3
INTAKE STRUCTURE
MAXIMUM MOMENTS,
NORTH-SOUTH EARTHQUAKE

Element	Bending Moment (kip-in./ft)	Allowable Moment* (kip-in./ft)
Upper Walls		
Flow straightener - Front	503	863
Flow straightener - Rear	1,190	2,276
Lower Walls		
Flow straightener - Front	2,166	1,726
Flow straightener - Rear	1,338	4,584
End wall	5,020	5,976

* Includes $\phi = 0.90$.



mpbl

1 MR. NORTON: Some day you and I are going to say
2 that the same way.

3 (Laughter.)

4 MR. NORTON: I have no further direct.

5 MRS. BOWERS: Mr. Kristovich?

6 CROSS-EXAMINATION

7 BY MR. KRISTOVICH:

8 Q Mr. Ghio, was the intake structure originally
9 designed as a Category 2 structure?

10 A (Witness Ghio) Yes, it was.

11 Q Is Category 1 equipment in the intake structure?

12 A Yes, there is.

13 Q Is the auxiliary seawater pump Category 1 equip-
14 ment?

15 A Yes, it is.

16 Q And is that in the intake structure?

17 A Yes, it is.

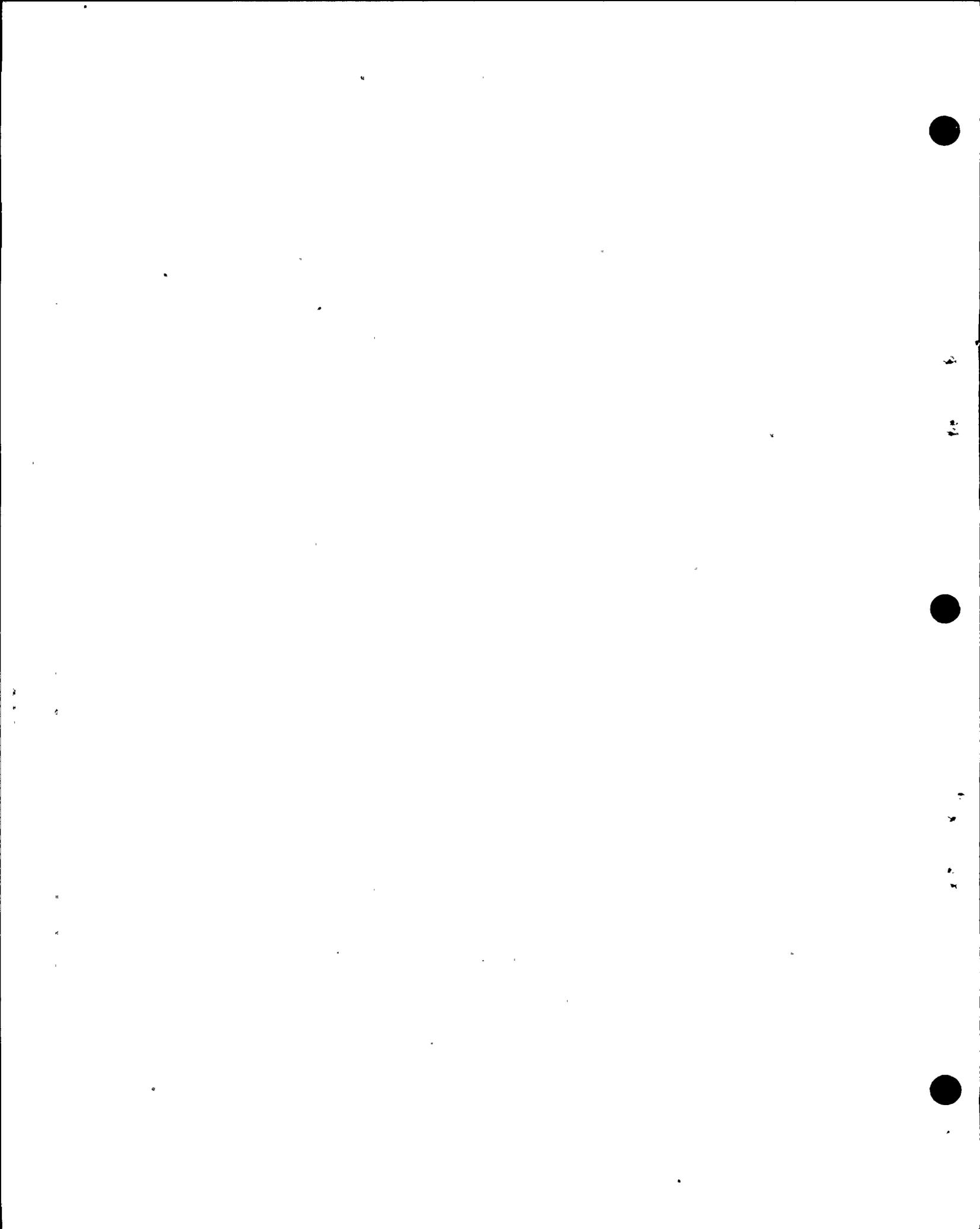
18 Q Okay.

19 Directing your attention to page 1 of the
20 written testimony, line 10, you refer to spatial averaging of
21 accelerations.

22 This is tau effect?

23 A Tau filtering, yes.

24 Q And was the adjustment for tau effect made after
25 reducing the peak instrumental acceleration of 1.15g to the



mpb2

1 .75g effective acceleration?

2 A Yes, it was.

3 Q And what was the adjustment for tau at zero
4 period acceleration under both the Blume and the Newmark
5 spectra?6 A In the case of the Blume spectra the adjustment
7 was from .75 to .67g.8 In the case of the Newmark spectra it was from
9 .75 to .60g.10 Q So in the case of the Blume spectra it was a
11 reduction of .08g, or approximately ten percent?

12 A That's correct.

13 Q And for the Newmark spectra it was a reduction
14 of .15g, or approximately 20 percent?

15 MR. NORTON: Excuse me.

16 Let me correct the record. It wasn't a .08g drop,
17 it was a .08g.18 MR. KRISTOVICH: Excuse me, I misspoke, .08 for
19 the Blume spectra.

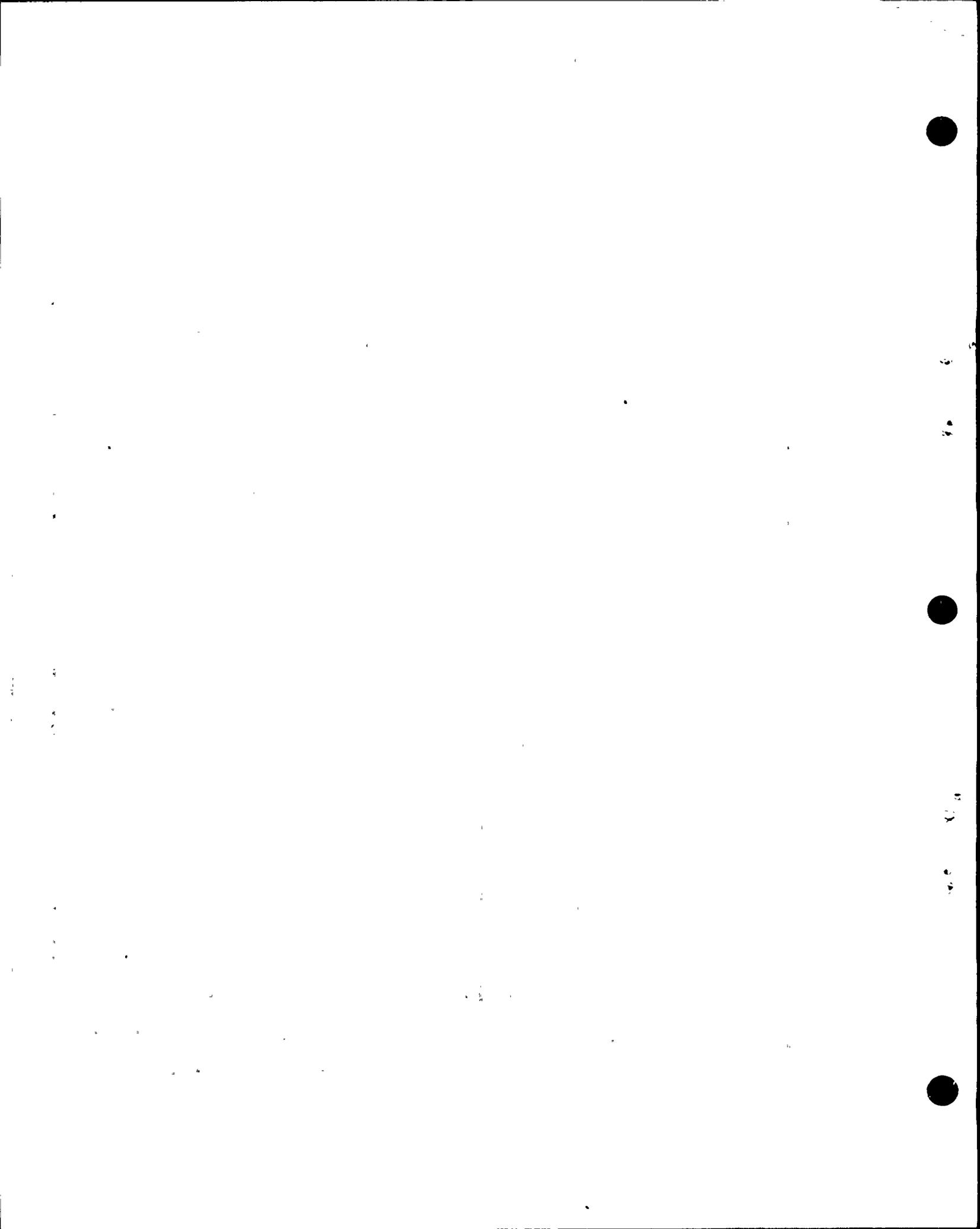
20 BY MR. KRISTOVICH:

21 Q And for the Newmark spectra .15g or 20 percent?

22 A (Witness Ghio) That's correct.

23 Q What is the fundamental mode for the intake
24 structure, Mr. Lang?

25 A (Witness Lang) The fundamental mode for the



mpb3

1 intake structure in the east-west direction is approximately
2 .04 seconds; in the north-south direction approximately .1
3 second.

4 Q And what was the adjustment for tau for the
5 fundamental modes for the intake structure?

6 A Excuse me, we have to go back to Figure 16.

7 Q I think if you refer to Figure 15 of Dr. Blume's
8 testimony --

9 A Figure 14.

10 Q Figure 14, excuse me.

11 A 12 and 13.

4.152

12 It's very difficult to estimate on this particular
13 plot because the curves converge in that area. We could
14 estimate that there would be very little reduction.

15 The reduction would be similar to that of the
16 zero period acceleration.

17 Q Which is 10 to 20 percent, depending on whether
18 you use the Blume or the Newmark spectra?

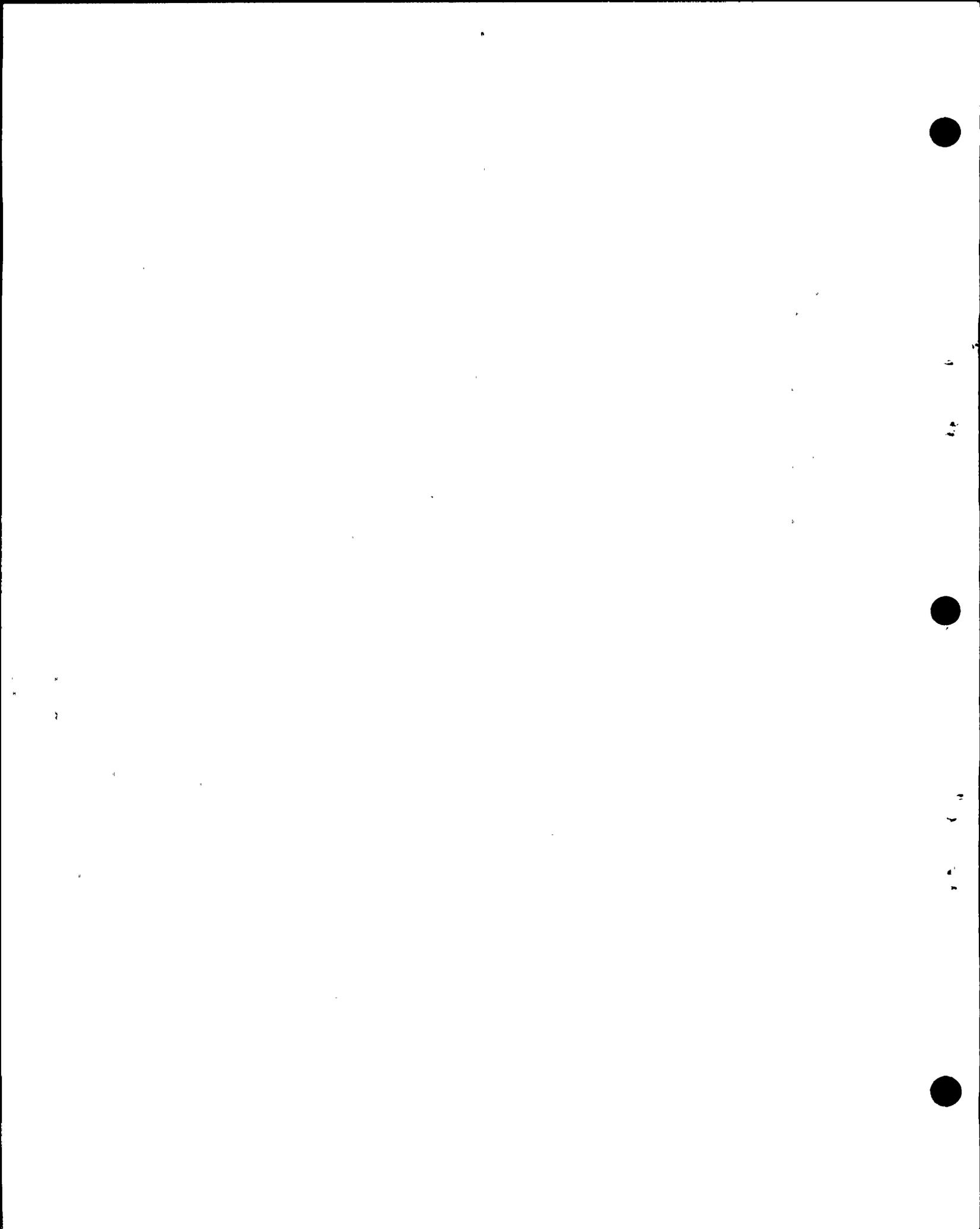
19 A That's correct.

20 Q Okay.

21 Mr. Ghio, how in the fixed base mathematical
22 model which was used did you account for soil properties?

23 A (Witness Ghio) Well, with the use of a fixed base
24 model the soil properties do not enter into the calculation.

25 Q Did you do an OBE analysis for the intake



mpb4

1

structure?

2

A Yes, we did. The intake structure was evaluated for the original seismic criteria for the design Class 1 structures, even though it was design Class 2. We did do an analysis for the design earthquake and the double design earthquake.

3

4

5

6

7

We found that the double design earthquake governed.

8

9

Q Governed in every case?

10

A Governed in the case of the intake structure.

11

Q Did you use constant vertical accelerations or dynamic vertical accelerations?

12

13

A We used unamplified vertical response.

14

Q Have you redone the DE analysis with amplified vertical?

15

16

A No, we have not. However, I believe that the Hosgri analysis has shown that the structure experiences no vertical amplification. And that kind of conclusion is independent of the excitation level. It's a property of the structure. The structure is rigid in the vertical sense.

17

18

19

20

21

Q Okay.

22

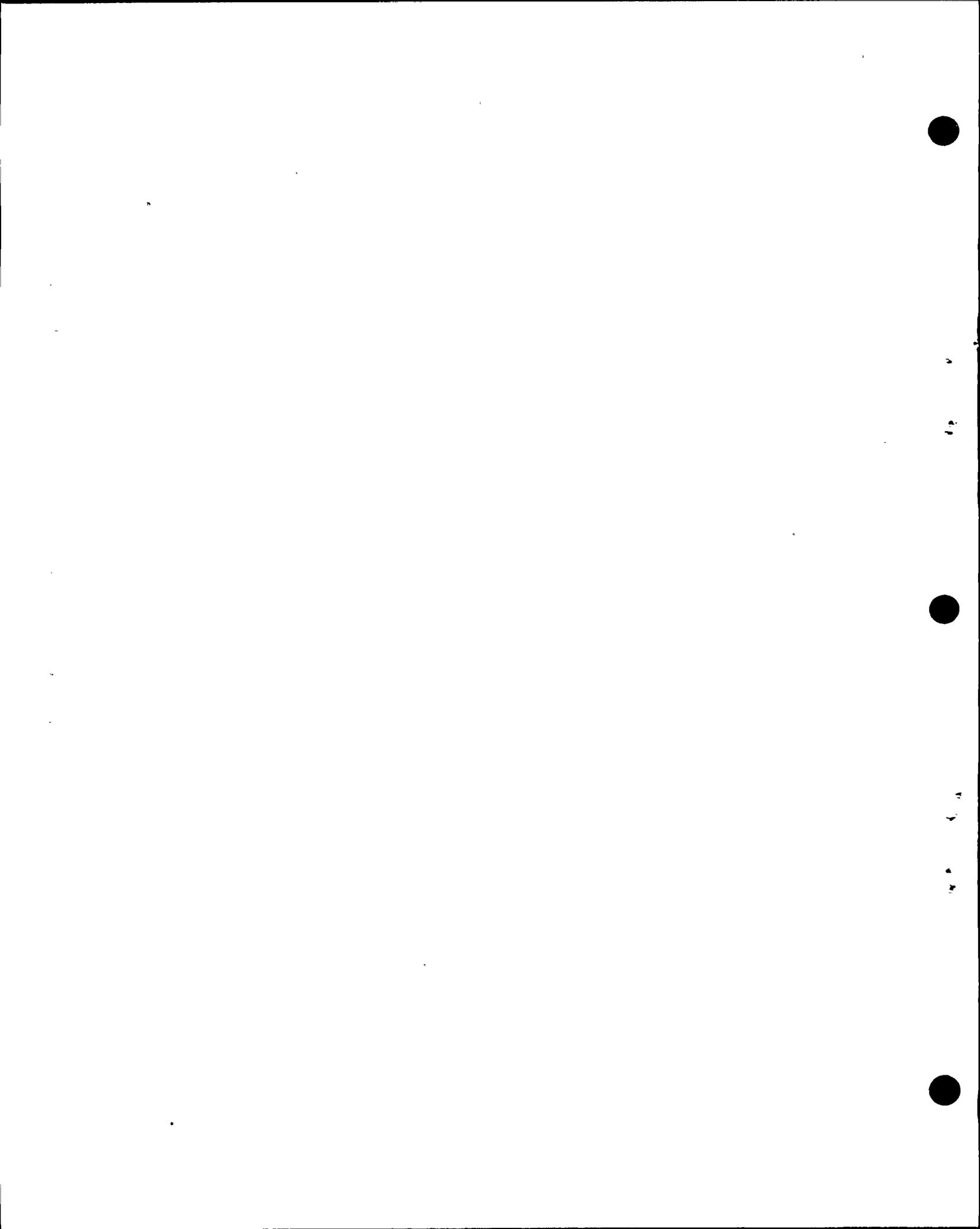
Mr. Ghio, directing your attention to page 3, lines 23 through 25, you talk about stability analyses for the intake structure.

23

24

25

On November 8, did the Applicant present a



mpb5

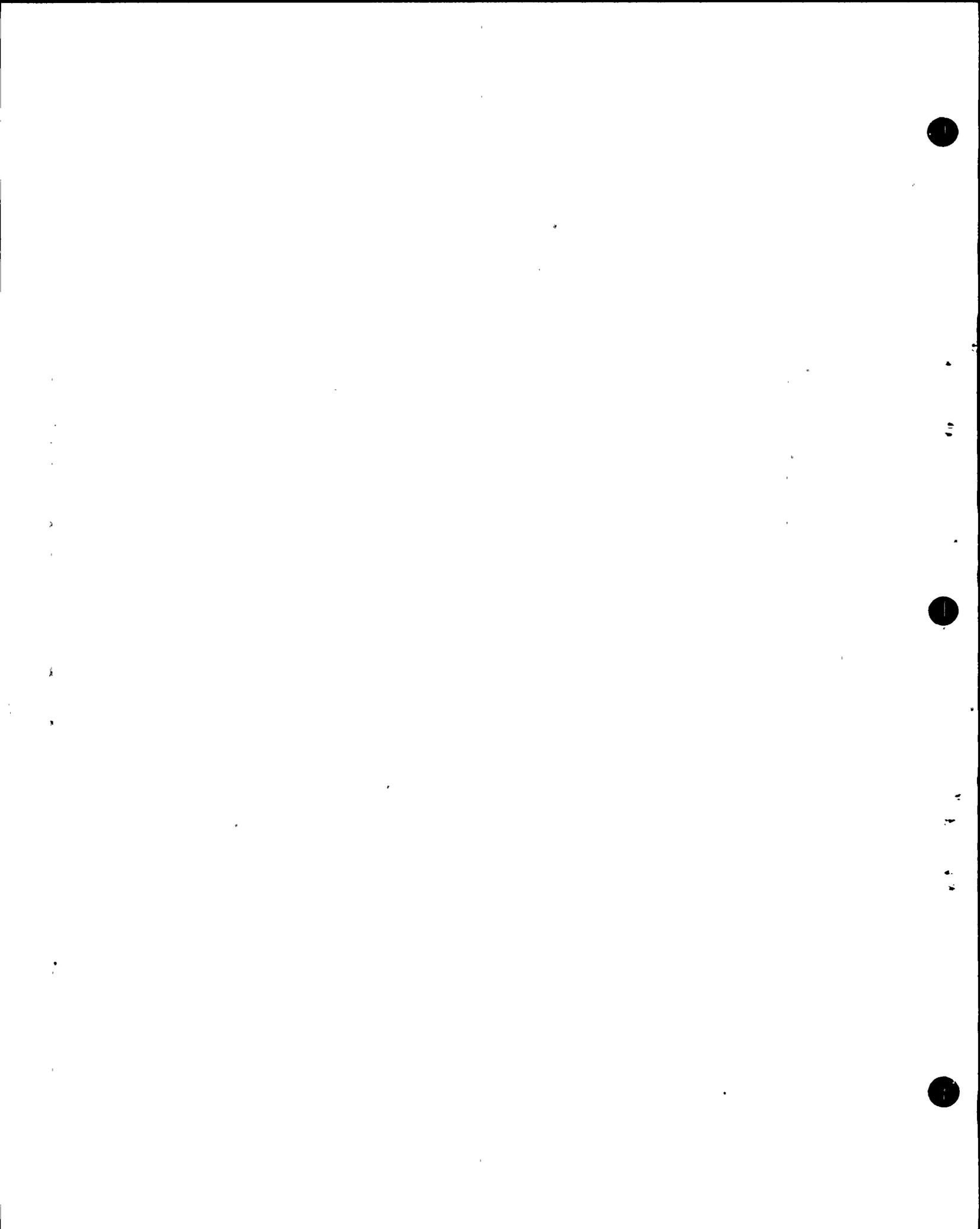
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revised analysis for stability?

A There have been a number of analyses for stability. I don't recall the dates. November 8 may very well have been a date that we submitted something for Staff review.

Q Okay.

end
MADELON
WRBLOOM
flws



wrb/agbl
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1 Q Mr. Ghio, I'd like to direct your attention to
2 SER Number 8, Page 3-14.

3 A (Witness Ghio) Just a moment, please.
4 I have it now.

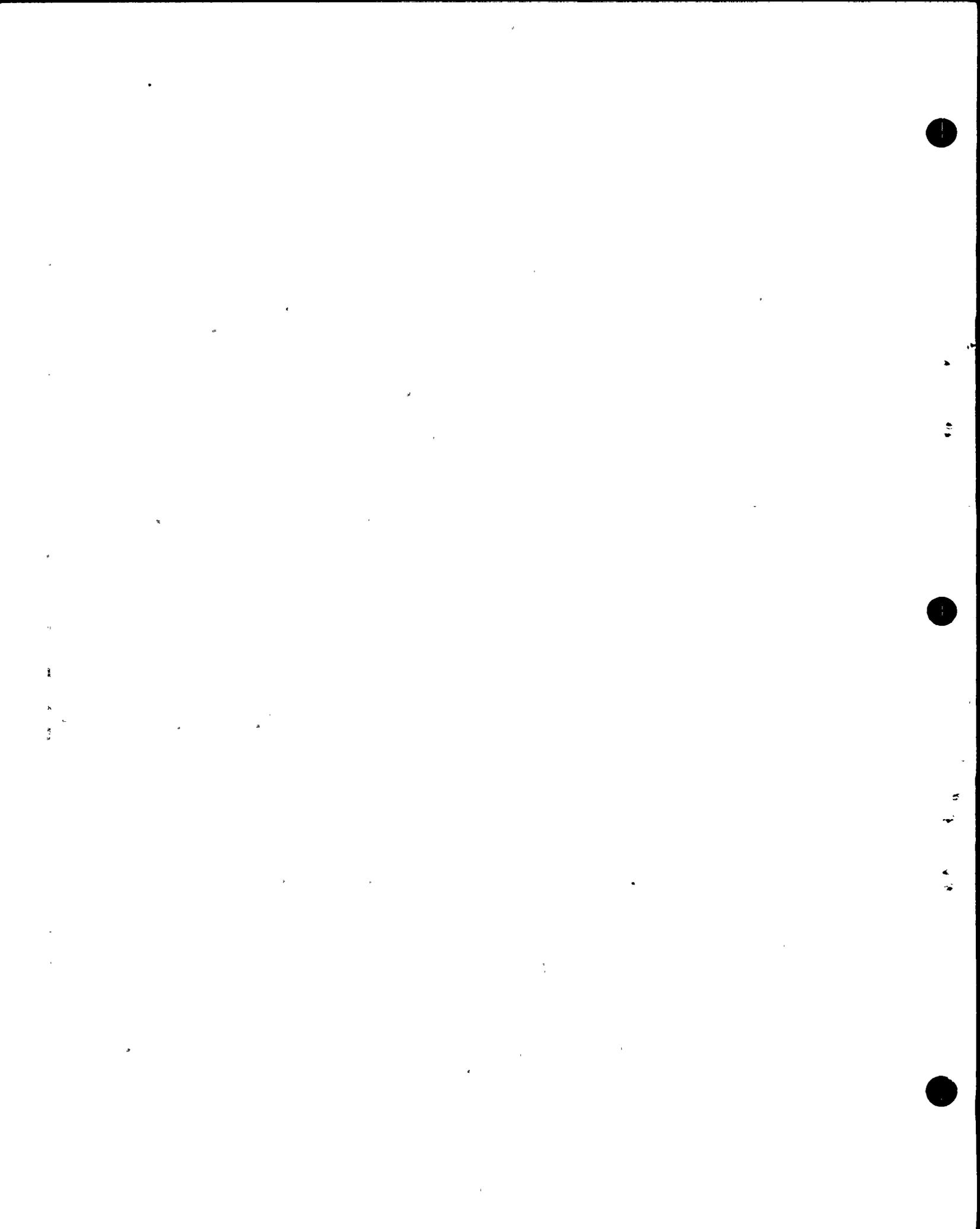
5 Q Okay, the last paragraph reads:

6 "Since then we end up, and our con-
7 sultants have reviewed the analysis which,
8 after using the correct shear key area in-
9 dicated a factor of safety on the order of
10 1.01.

11 "We and our consultants were not
12 satisfied with this load factor of safety. The
13 Applicant indicated, however, that this factor
14 of safety was derived using unrealistically
15 conservative assumptions to simplify the
16 analysis.

17 "Consequently, we required the Appli-
18 cant to quantify the conservatisms involved.
19 At a meeting on November 8, 1978, the Appli-
20 cant presented a revised analysis which quantified
21 the conservatisms embodied in various parameters.

22 "The final result of these analyses
23 indicated a factor of safety on the order of
24 2.2 when a more detailed study using realistic
25 values was employed, thus relieving concern that



wrb/agb2

1 there would be unacceptable motion of the intake
2 structure.

3 "The Applicant also indicated that,
4 since there was no uplift predicted for the
5 foundation slab, there would be no tilting
6 possible for the intake structure. We and our
7 consultants agree with the Applicant's approach.
8 We will require submittal of a final report on
9 the analyses to confirm these results."

10 Has such a final report on revised analysis been
11 submitted to the NRC?

12 A Yes, it is.

13 Q And when was that done?

14 A I'm unable to quote a date, I'm afraid.

15 A (Witness Lang) It probably would have been a week
16 after that November 8 date.

17 Q Was that sent to the service list also?

18 A (Witness Ghio) We don't know.

19 MR. NORTON: I believe informal audit, Public
20 Document Room.

21 BY MR. KRISTOVICH:

22 Q Referring to the same paragraph I just read,
23 Mr. Ghio, could you explain what approach led to a factor of
24 1.01?

25 A (Witness Ghio) I'll have Mr. Lang address that.



1111



1111



wrb/agb3

1
2 Q All right. Mr. Lang.

3 A (Witness Lang) Well as the paragraph describes,
4 we used what we considered unrealistically high estimates
5 of the forces that cause sliding or overturning, and we com-
6 bined that with unrealistically low estimates of the forces
7 that resist that type of motion.

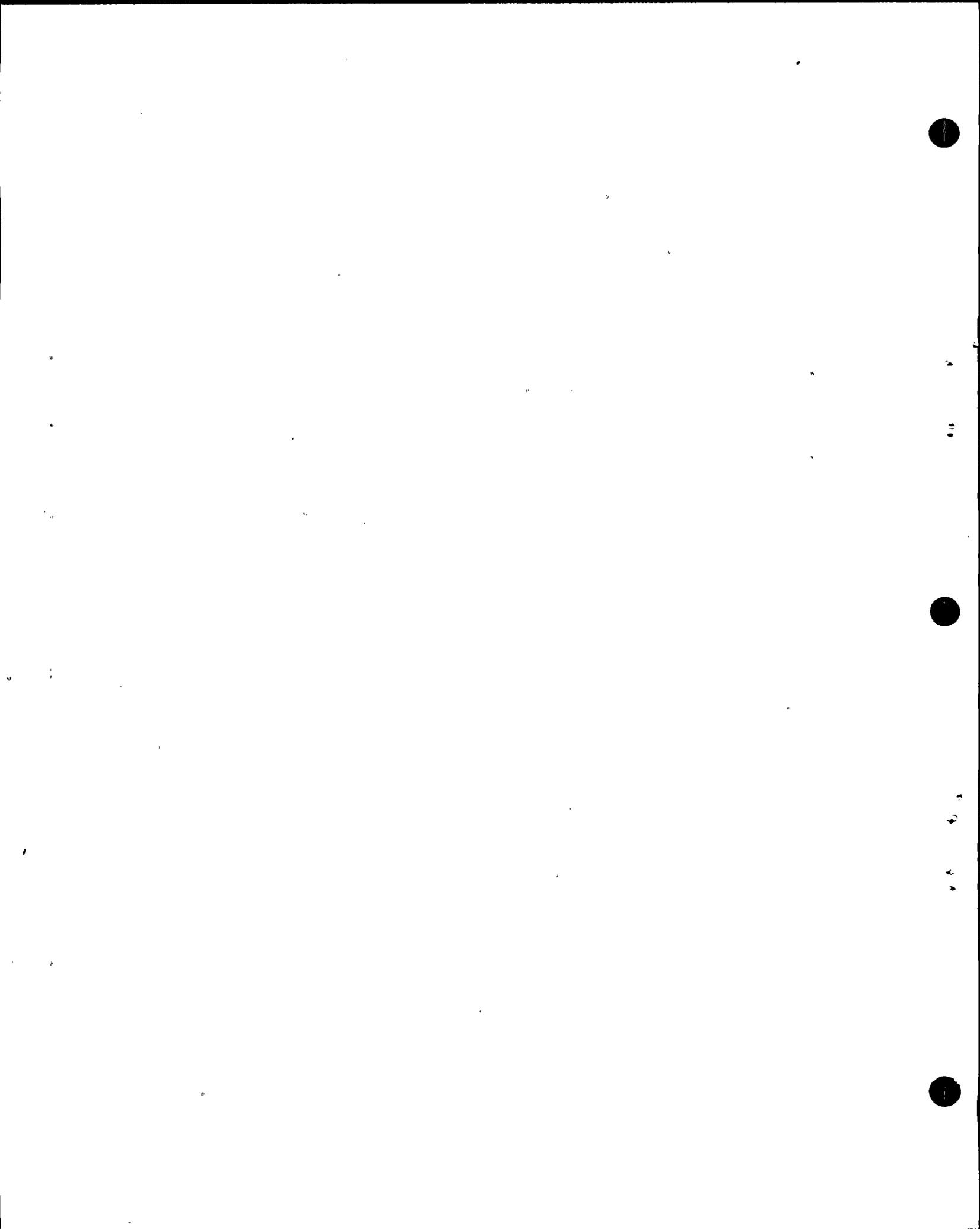
8 Now when we calculated a factor of safety of 1.01,
9 that doesn't sound like very high. But when we knew what the
10 numbers were that went into that calculation, we weren't
11 concerned. However, the NRC was not aware of all the conserva-
12 tions that went into those numbers, so they required a more
13 realistic estimate.

14 Q And how did you modify the approach to give a
15 factor of 2.2?

16 A Well there were a number of things. In the original
17 analysis, we did not -- we ignored any bounding that occurs
18 between the intake structure and the surrounding rock. The
19 intake was poured against the rock, there's a significant
20 bond that exists between the two, we ignored that originally.

21 In terms of the sliding forces or the overturning
22 forces, we used an absolute sum of many different types of
23 forces that occur of a dynamic nature, that is unrealistically
24 conservative.

25 We later came back and combined many of these
forces on an SRSS basis to take into account the fact that the



wrb/agb4

1 peaks don't occur at the same time. Those two are probably
2 the most important factors that led to the revised number.

3 Q Could you tell us some of the other factors that
4 were used, changes in assumptions, for example?

5 A No, I think those were probably the two most
6 important.

7 Q But you did use other factors?

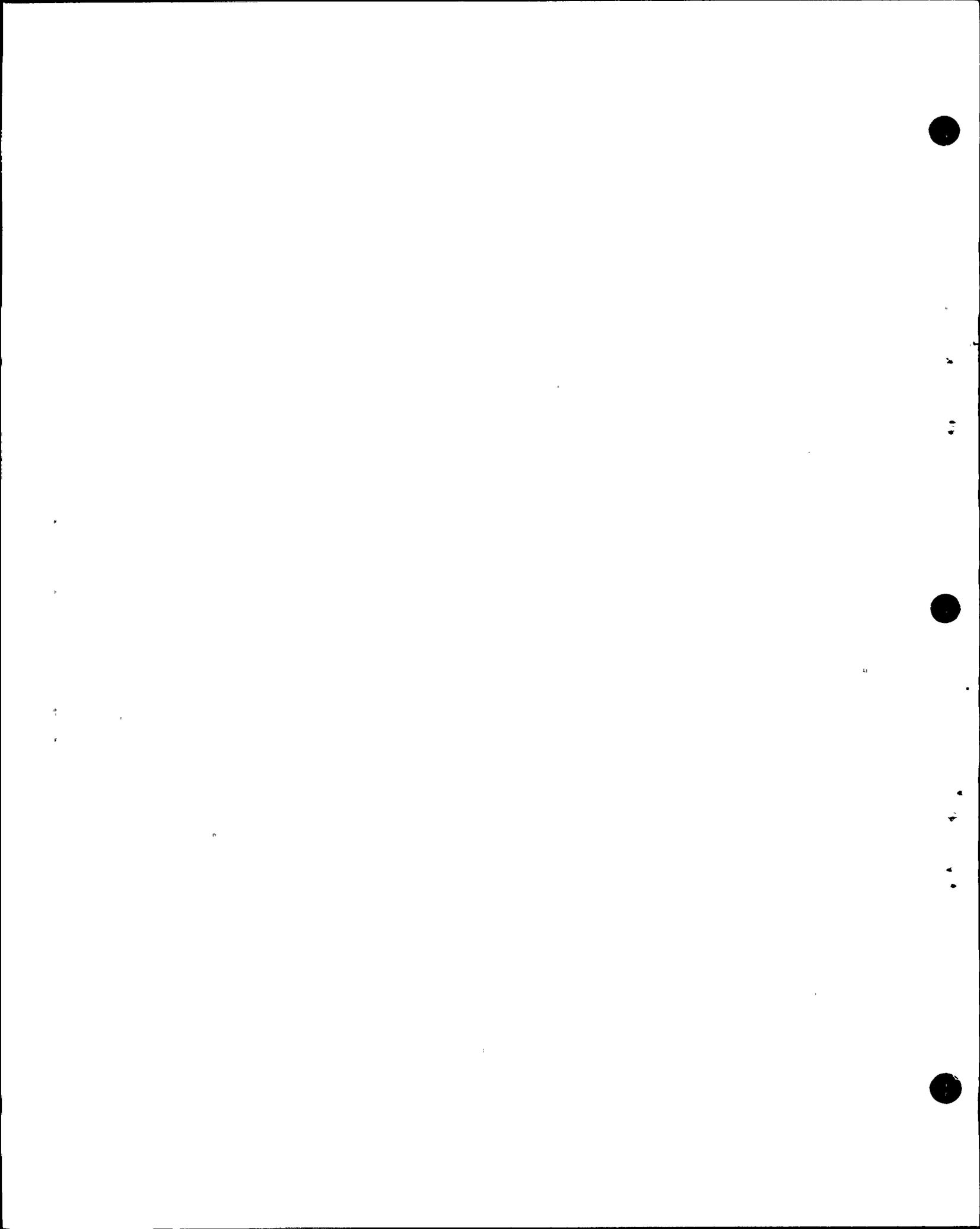
8 A I can look it up if you want me to.

9 Q Yes.

10 A (Witness Blume) While he's looking that up,
11 I would like to state that the Bureau of Reclamation, in
12 designing concrete dams on rock for earthquake resistance and
13 for water pressure, has been using 500 pounds per square inch
14 bond between the concrete and the rock. And as Dave Lang
15 just mentioned, in this original analysis, they used zero.
16 And this bond is very, very effective in preventing sliding
17 and any tendency toward uplift.

18 I'd also like to mention, while I'm on the line
19 here, that in my opinion a ductility of 1.3 that has been
20 mentioned would not cause spalling but merely some minor
21 cracking.

22 A (Witness Lang) I would say that the only two
23 factors that were really significant were the difference in
24 combination of structural responses and the inclusion of the
25 bond between the concrete and the rock. There were a number



wrb/agb5

1 of other factors that we did not consider.

2 Q Well with regard to those two factors, how much
3 of the change from 1.01 to 2.2 could be attributed to each
4 one?

5 A That would be impossible for me to say right here.
6 It would take a little work.

7 Q Well is it about half and half?

8 A I'd say half and half if I had to say right now.

9 Q Well what did you now use, what numbers did you
10 use for the bonding between the rock and the structure?

11 A The number used was 500 psi.

12 Q And the basis for that?

13 A The basis for that was the Bureau of Reclamation
14 report on the Auburn Dam that Dr. Blume described.

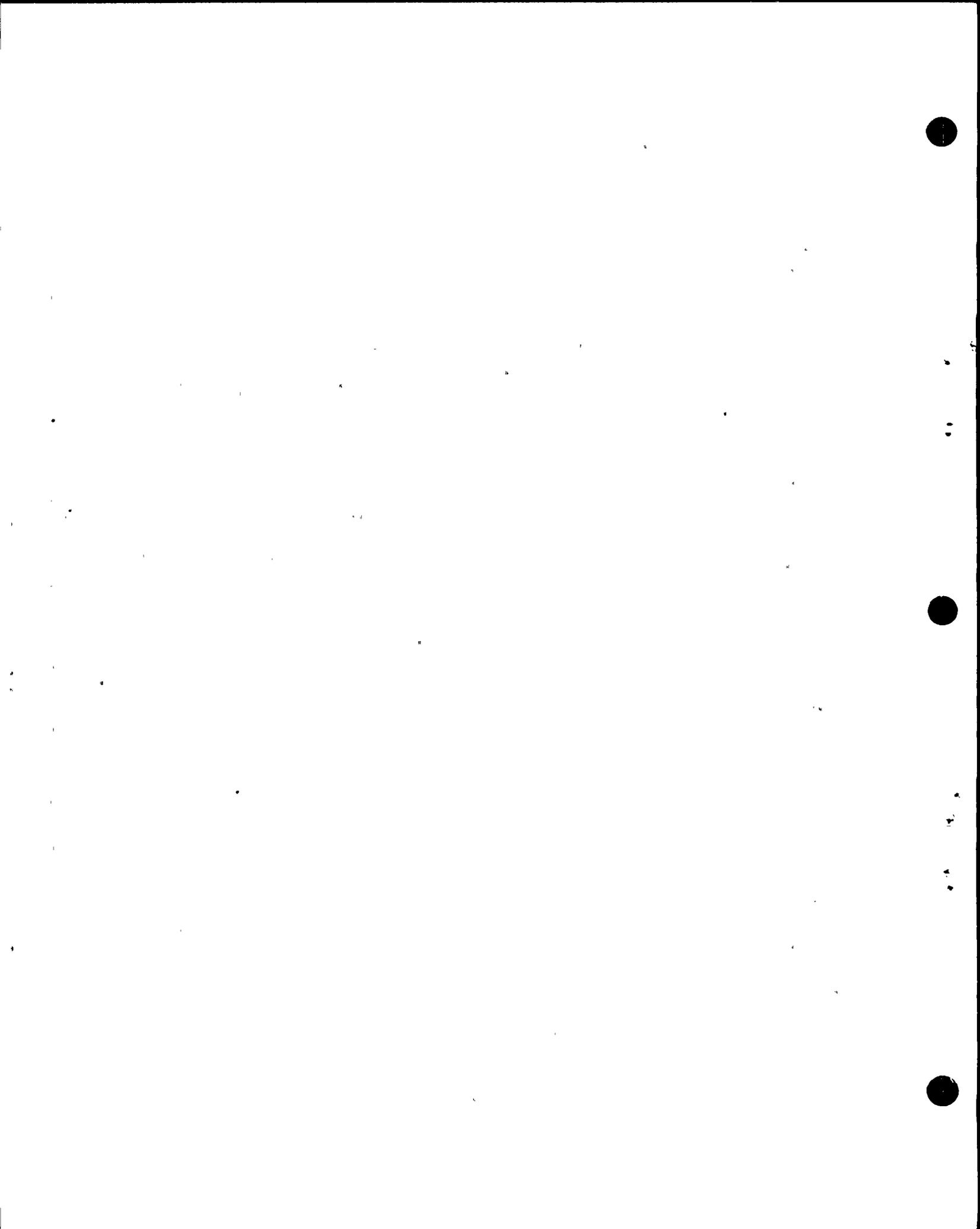
15 Q And is that relevant to the rock at the Diablo
16 Canyon site?

17 A Yes, it is. That value is high enough that
18 the critical plane now exists in the rock below the structure
19 and not at the interface. And that value in the rock below
20 the structure is approximately 21 psi, so even if the 500
21 is not accurate, it would have to drop a long ways before it
22 got to 21.

23 Q Well in doing this analysis, what kind of rock
24 did you assume was under the intake structure?

25 A Well that material is provided to us by our soil

5.065



wrb/agb6

1 consultants.

2 Q Did they tell you the kind of rock?

3 A The shear strength of the rock is 3000 psi.

4 Q And what kind of rock was underneath the Auburn
5 Dam?

6 A I'm not sure right now.

7 Q Then how do you know they're comparable?

8 A (Witness Blume) The rock under the Auburn Dam
9 is not quite the same but similar in many respects. I'd say
10 it's much more complex. It has intrusions of volcanic material
11 into sandstones and so on. We have sandstone at Diablo Canyon
12 and siltstone. So there are many similarities.

13 But the point is the Bureau uses the value I
14 mention not only at Auburn Dam but at other places with all
15 kinds of rock.

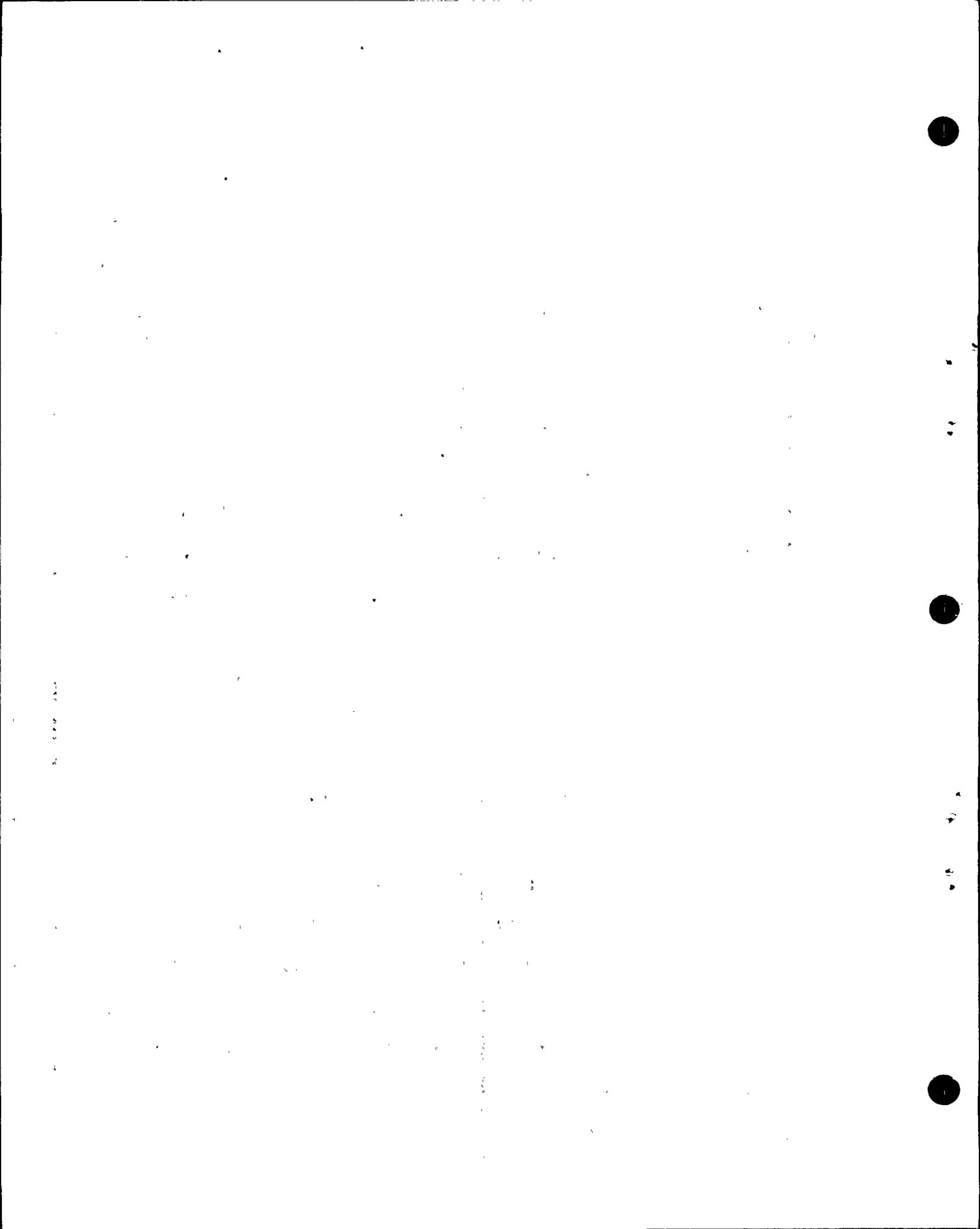
16 Q Are those the only similarities?

17 A Well it's hard to find any two spots that far
18 apart that are exactly similar, geologically.

19 Q Then what are the differences?

20 A In the nature of the rock, the amount of cracking,
21 the intrusion, the volcanic intrusions and so on, but they
22 are both rocky sites and the rock is cleaned down--the surface
23 material is taken away, they're both cleaned down to expose
24 the rock surface.

25 But as Mr. Lang pointed out, he's only taking



wrb/agb7

1 advantage of 21 pounds out of the 500, so they could almost
2 do the same thing on soil.

3 Q Directing your attention to Page Threes of
4 the direct testimony, Lines 17 to 18, what was the ductility
5 factor obtained?

6 A (Witness Ghio) I'll have Mr. Lang answer that.

7 A (Witness Williams) 1.89.

8 Q Is this Mr. Williams?

9 A Yes.

10 It depends on the assumption of the plastic
11 hinge length. We took two cases of 5 percent of the distance
12 in flexure and 10 percent. And I believe the numbers were
13 1.89 for the 5 percent plastic hinge length and a lesser
14 number for the 10 percent plastic hinge length.

15 Q Wasn't the acceptance criteria 1.3?

16 A No, it is 3.

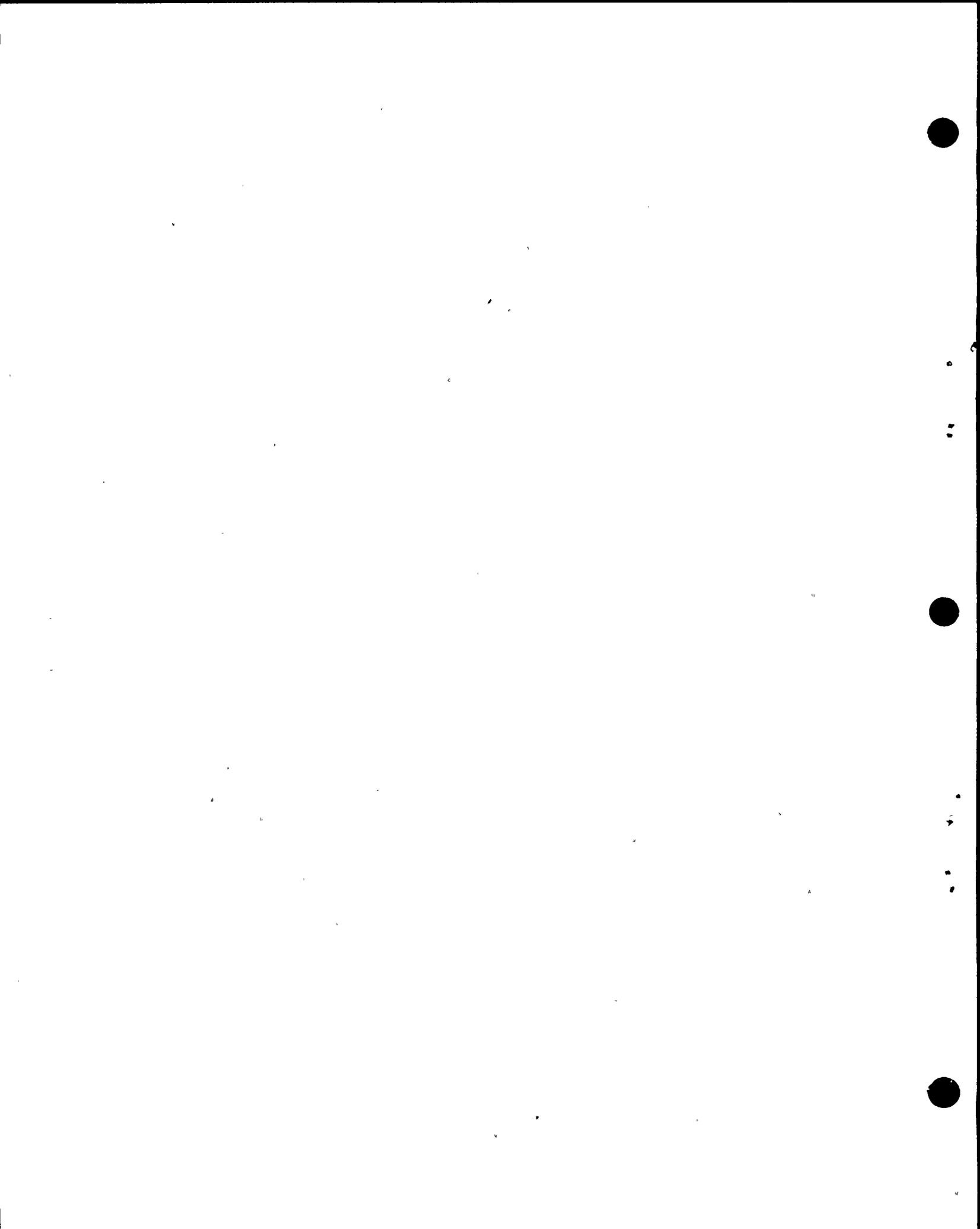
17 Q Well I'd like to refer your -- direct your attention
18 to Page 3-13 of SER Number Eight.

19 A I think if there is a confusion here, it's over
20 the way in which a response spectra is reduced. In this case,
21 we used 1.3. But if we were doing a detailed ductility analysis
22 the criteria states three.

23 Q Well I'd like to direct your attention to the
24 third paragraph under Section Two which reads:

25 "The Applicant has performed the

5.140



wrb/agb8

1 additional structural analyses using two
2 different techniques to determine the
3 ductility required for these piers.

4 "The energy reserve technique resulted
5 in a ductility ratio of 1.13 within the limit
6 of 1.3 which is set forth in the structural
7 specification. A more conservative technique,
8 based on moment curvature relationship of
9 structural members resulted in the ductility
10 ratio of 1.52. We and our consultants have reviewed
11 the above information."

12 A The figures I gave you were for local
13 ductilities. These are displacement ductilities. I'm sorry,
14 I should have clarified that.

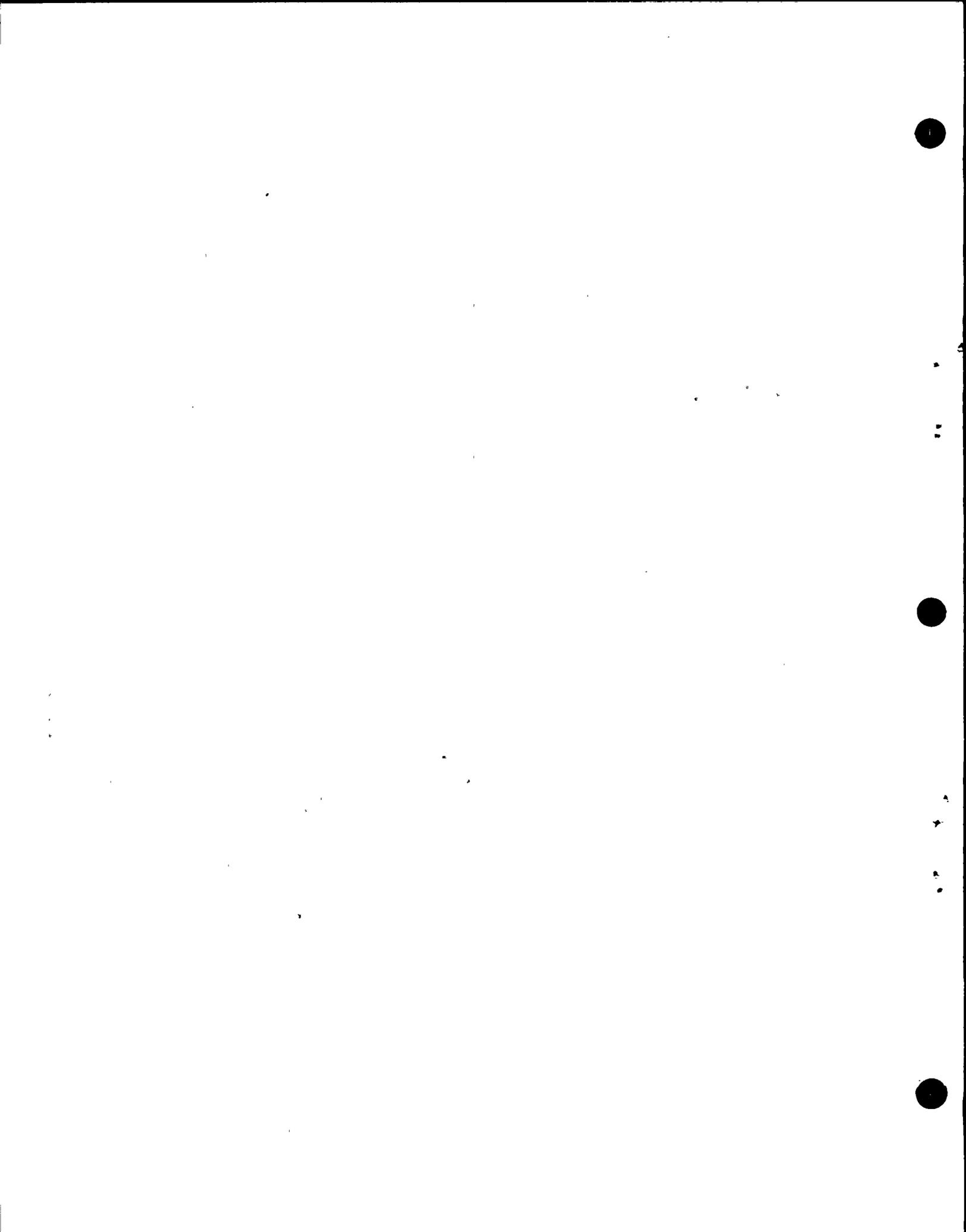
15 A (Witness Blume) As the author of the Blume
16 spectra and the resulting 1.3 allowable ductility that I
17 recommended go along with those, that ductility was to be a
18 story-type ductility.

19 In other words, the drift or distortion of a
20 story or a unit of a structure and not the local. Local
21 ductility, as I mentioned previously today, could be higher.

22 Q Well Mr. Williams, could you explain the difference
23 between local ductility and displacement ductility?

24 A (Witness Williams) Sure.

25 They are related -- I'm not sure how I can do this



wrb/agb9

1 in lay terms.

2 Well, in scientific terms, they're related by
3 integrating the curvature over the length of the member. The
4 plastic curvature is concentrated in the plastic hinge zone.
5 I could give you the relationship if you want it.

6 Q Yes, please.

7 Do you want to put that up on the screen so we
8 can all see it?

9 A Sure.

10 MR. NORTON: Just read it. I mean, I don't know
11 why he needs to have it marked as an exhibit, he can just
12 read the numbers. We've got to get the screen out and every-
13 thing. Is there any real need? I mean, if you reask the
14 question he can answer it.

15 BY MR. KRISTOVICH:

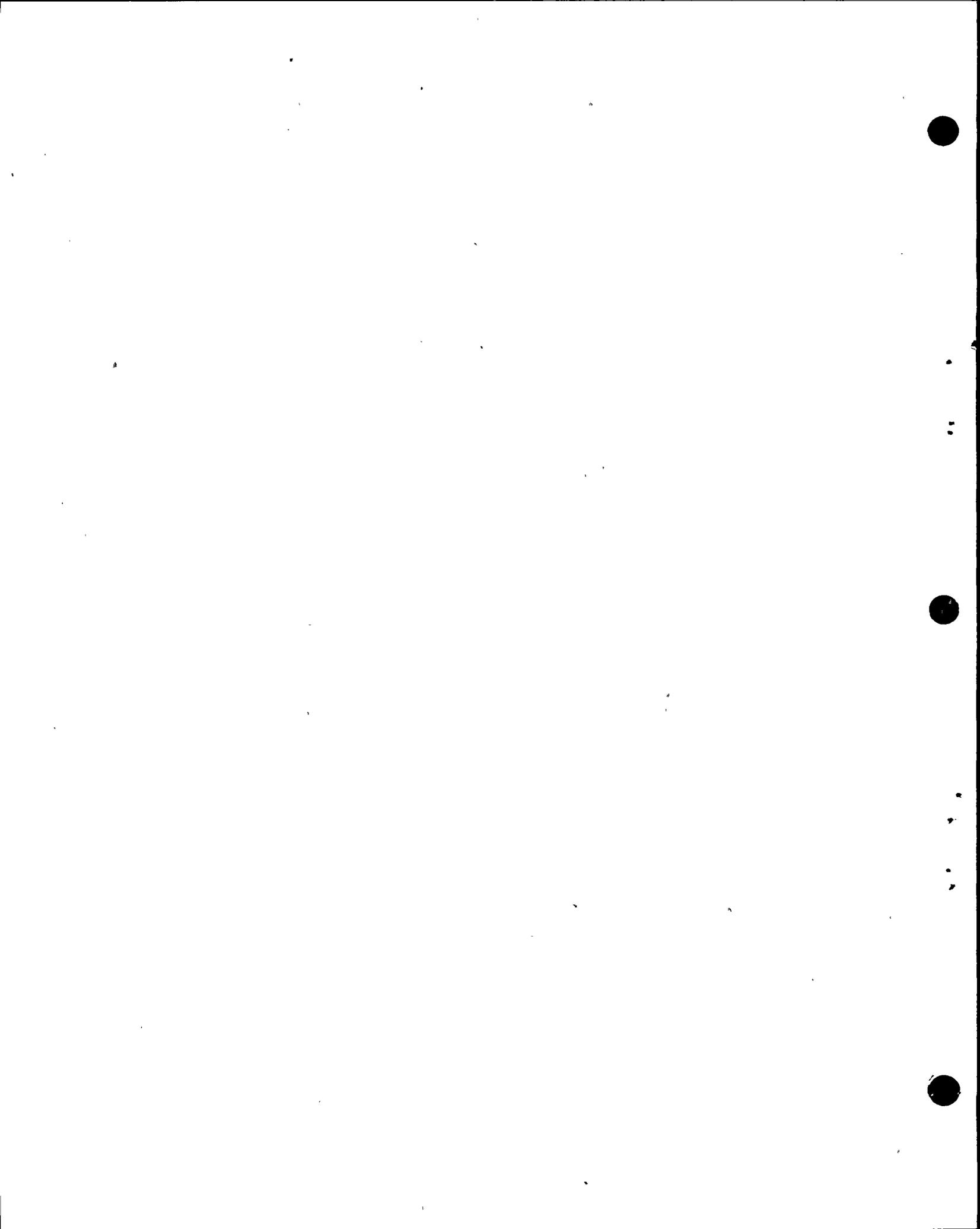
16 Q I'm not sure what you're going to do with that.

17 A (Witness Williams) Well, I was going to give you
18 the equation that relates the displacement ductility factor
19 to the local curvature ductility factor.

20 Q Fine. Okay. Just do it slowly.

21 A The displacement ductility factor is equal to
22 the integral between the limits of zero and L of X which is
23 the distance along the -- maybe I'll define the terms later.

24 X times the curvature integrated with respect
25 to distance divided by the integral between zero and L of X

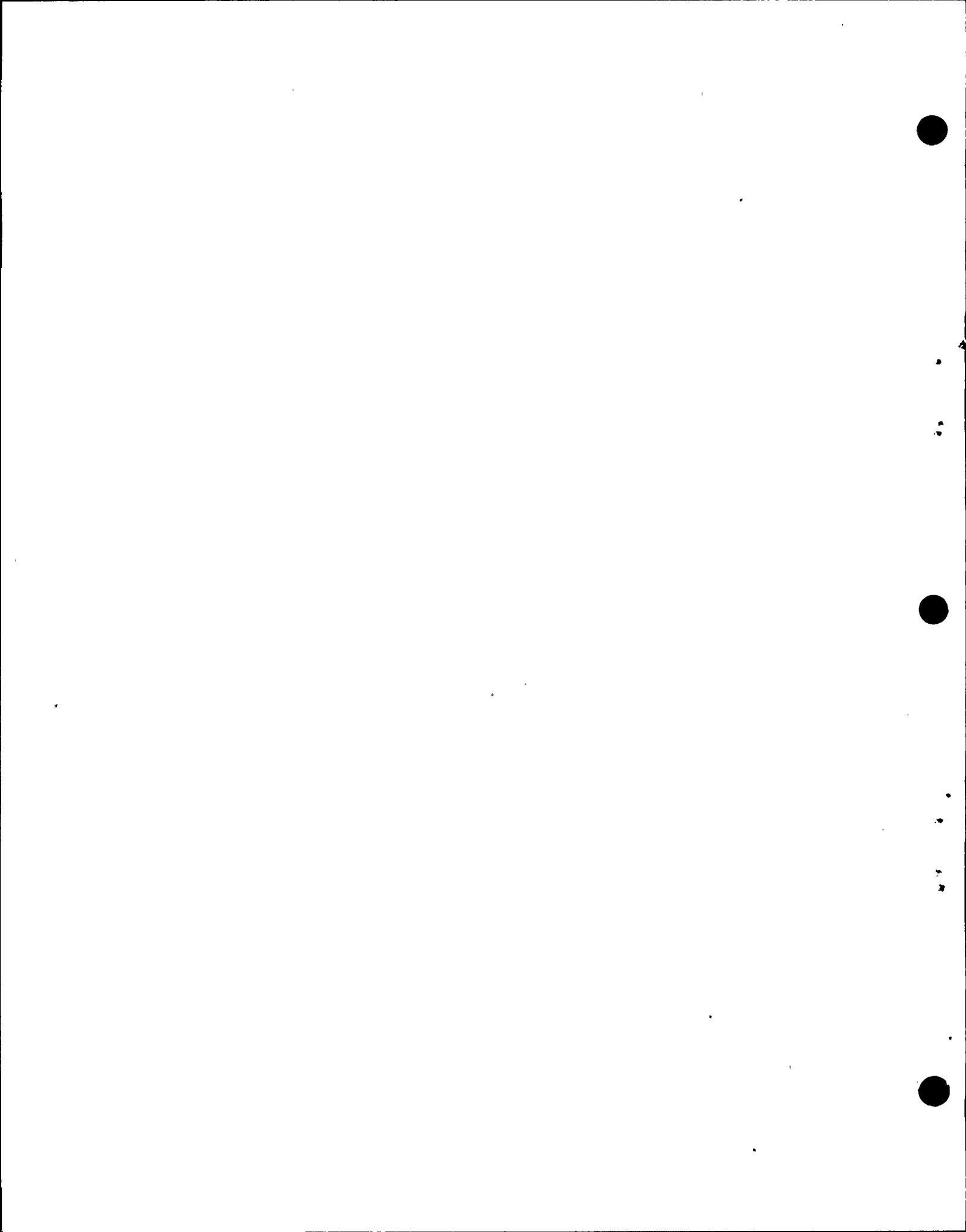


1 times the elastic curvature with respect to distance.

2 DR. MARTIN: What's X?

3 WITNESS WILLIAMS: X is the distance. It's a
4 variable distance along the member.

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BY MR. KRISTOVICH:

WRB/wbl

2

Q Mr. Williams, in the Newmark spectra for the

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3

intake structure was any ductility allowed?

4

A (Witness Williams) No.

5

Q And why is that?

6

A I'm not sure.

7

Q Did the Blume or the Newmark spectra apply in

8

the analysis here?

9

A (Witness Lang) The Newmark spectra applied here.

10

A (Witness Williams) I think I should add some-

11

thing. The Newmark spectra was not allowed to be reduced

12

in lieu of a ductility analysis. There were provisions in

13

the criteria which stated that in certain instances detailed

14

ductility analysis could be performed.

15

Q And what instances are those?

16

A Well this was one case in which it was done.

17

A (Witness Blume) This is basically a Type 2

18

structure, or Category 2.

19

Q With Category 1 equipment in it.

20

A Yes. But as long as that equipment is not harmed

21

or damaged by anything, why....

22

Q Mr. Ghio, could you define spalling?

23

A (Witness Ghio) Spalling represents the removal

24

of surficial portions of a concrete element.

25

Q When you say "removal," do you mean chipping,



1 pieces falling off?

WRB/wb2

2 A Yes, pieces falling off.

3 A (Witness Williams) I would like to repeat what
4 Dr. Blume said before, that for these lower ductility factors
5 spalling is not even likely.

6 Q When you refer to spalling does this indicate
7 the size of pieces that might chip and fall off?

8 A (Witness Ghio) Well the word "spalling" doesn't
9 define the size. You asked this question earlier and I
10 indicated that the size is somewhat indeterminate. But it
11 has got to be constrained by the fact that the spalling would
12 be limited to the sections of concrete located outside of the
13 reinforcing steel curtain; within that the material is con-
14 tained. So we have a few inches of material that exists
15 outside of the reinforcing curtain. So the size of the
16 spalled pieces is limited by that dimensional constraint.

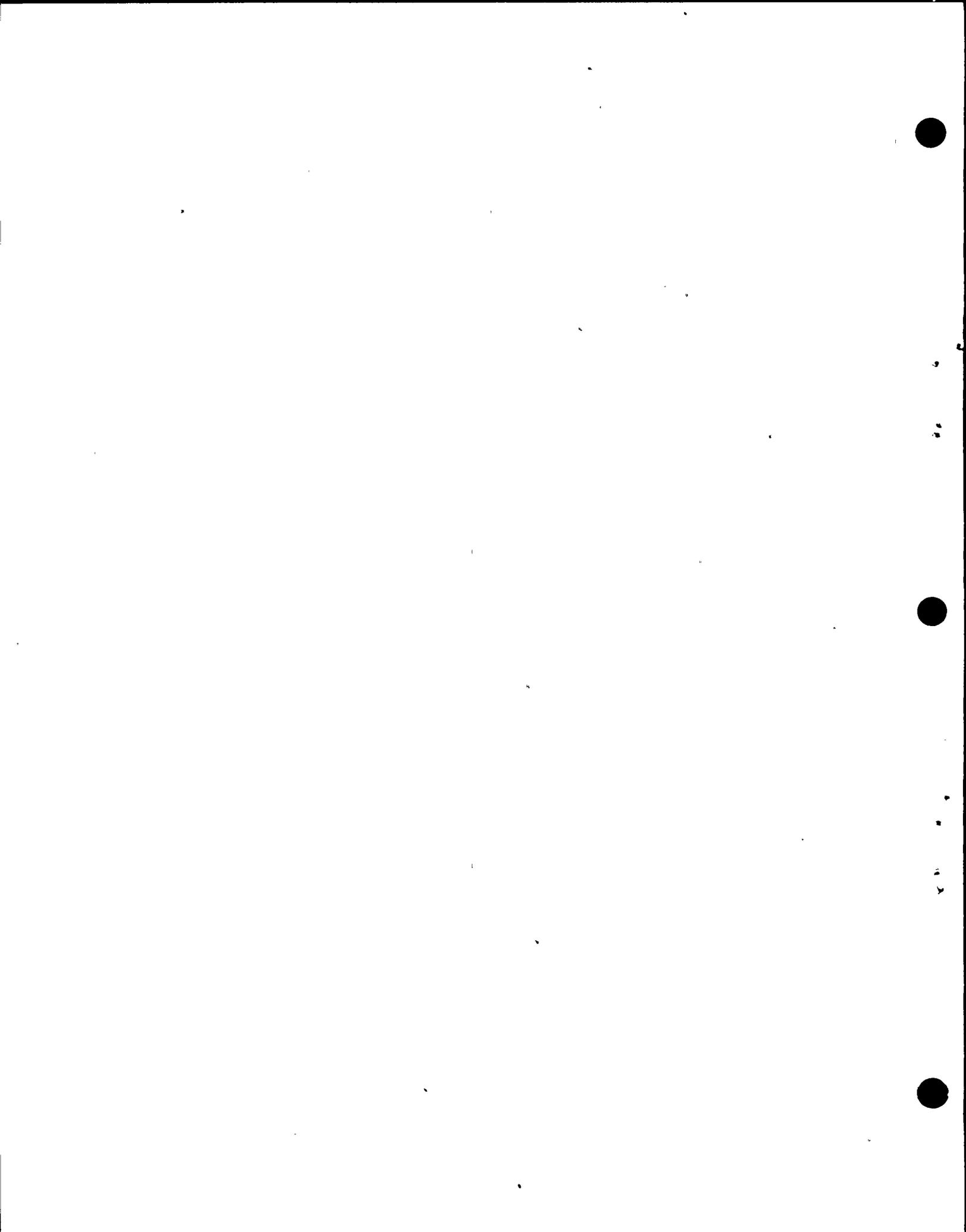
17 Q And what would happen if spalling occurred during
18 the Hosgri event?

19 A I think I previously testified that the material,
20 should it actually spall -- and this is somewhat speculative --
21 would deposit itself on the floor of the structure.

22 Q It would fall down?

23 A Yes. That's the extent of the scenario.

24 Q Has an analysis been done to determine what would
25 happen if there were a tsunami following the spalling?



1 A We have performed tsunami analyses for an event
2 originating on the Hosgri fault and have shown the wave
3 action to be sustainable by the structure.

4 I don't see that a few small pieces of --
5 postulated piece of concrete lying on the floor of the invert
6 would affect that analysis in any way. --on the floor of the
7 intake structure.

8 Q What I'm trying to get at, Mr. Chic-- Maybe I
9 stated the question incorrectly. --is: Was an analysis
10 determined, if there were a tsunami following the spalling,
11 is there a chance that the material could be taken into the
12 auxiliary water pump because of the tsunami?

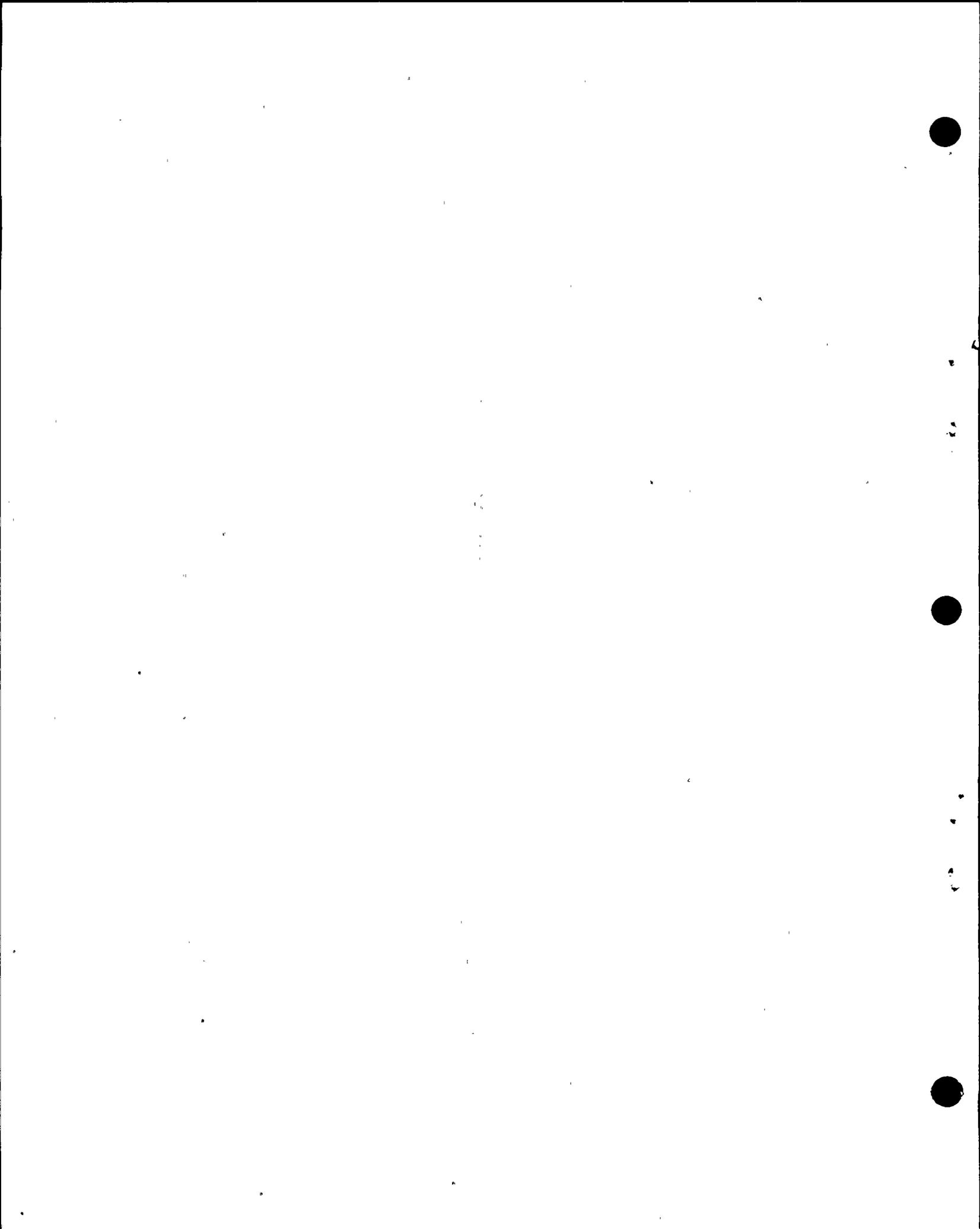
13 A No, I don't believe so. We did do an evaluation
14 of the potential for material associated with postulated
15 spalled concrete working its way back to the auxiliary salt
16 water pump bay locations. And because of the configuration
17 beyond these front walls and the remaining portion of the
18 structure inboard of that are unaffected by this earthquake
19 in terms of spalling, there is no spalling anywhere else,
20 we couldn't see any way that we could physically bring material
21 from the front end of the structure back to the auxiliary
22 salt water bays.

23 Q By a tsunami?

24 A By any kind of wave action, whether it's storm
25 waves or tsunami or normal conditions.

WRB/wb3

5.290



1 Q Mr. McLaughlin, do you have anything to add to
2 that?

3 A (Witness McLaughlin) You have to realize that
4 the pumps are situated some thirty feet behind this area.
5 The invert of these pumps are quite high above the floor of
6 the intake.

7 Q How high?

8 A Something in the order of ten feet. So even if
9 material got back there there's not enough material to pile
10 up, or plug the pathway to the pumps.

11 Q Directing your attention to page 3, line 3 and
12 also line 13, in both instances you refer to a capacity
13 reduction factor.

14 Q Would you explain this?

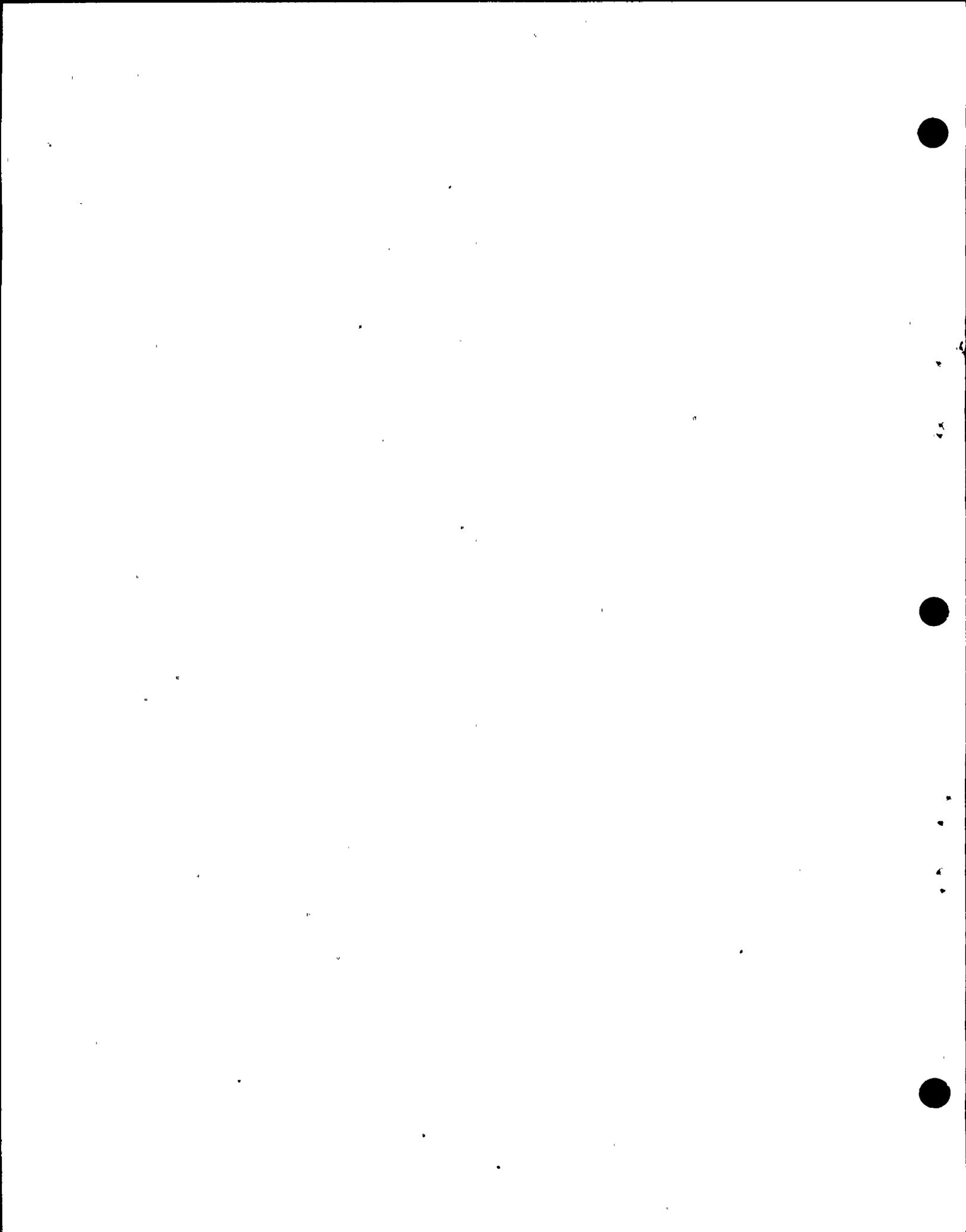
15 A (Witness Lang) This is the capacity reduction
16 factor that's been referred to many times earlier, often
17 used in designing a structure. And in this case it happened
18 to have been used in the course of an analysis, and it
19 represents an additional safety factor.

20 Q Was this used in any other structures, this
21 capacity reduction factor?

22 A This is the fourth of a series of structures.
23 I think this has been covered in all the other testimony.

24 Q Was this used in the other structures?

25 A In some cases it was. And, as I think was described



1 earlier, in the pedestal it was not.

2 Q And why was it decided to be used in this
3 structure?

4 A I don't know why it was used. The question is
5 why it was not -- you know, probably should not have been
6 used, to be consistent with a lot of the other analysis work.
7 But I don't know why we should question why it was used.
8 It's an additional safety factor.

9 A (Witness Blume) I'll have to repeat what I said
10 regarding the other structure: that when the structure was
11 there and existing and we know its properties, this should
12 have been a factor of 1. I think the reason it was used is
13 probably tradition of designers and possibly a result of some
14 of the audit discussions. But in my opinion the factor could
15 be 1 for any existing structure about which we know its
16 properties and qualifications.

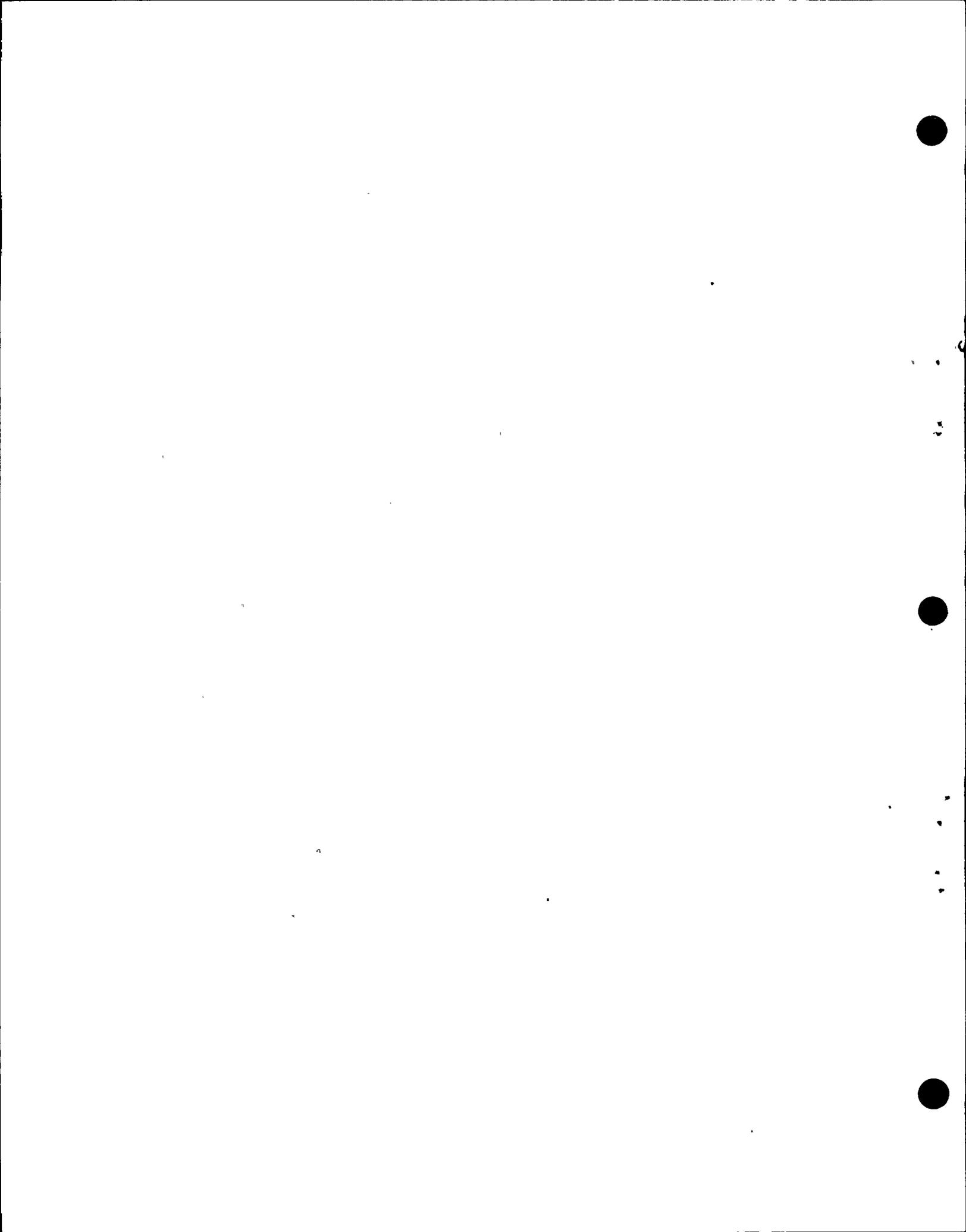
17 Q Well did any member of this panel pick this
18 number for this analysis?

19 A (Witness Lang) Yes, these are the standard ACI
20 reduction factors, the .85 for shear and the .9 for bending.

21 Q So, Mr. Lang, are you the one responsible for
22 using them in the analysis?

23 A Yes.

24 Q Directing your attention to Table 2, the third
25 column is entitled "Allowable shear stress, psi."



1 How do you calculate allowable shear stress?

WRB/wb6 2 A Allowable shear stress for a concrete wall is a
3 function of both the concrete and the steel reinforcing.

4 Now in many of these walls the stresses were so
5 low that what we used was just the contribution of the concrete
6 alone. The equation for that is 2 times the square root of
7 $F\text{-prime } C$, approximately 120 psi.

8 In cases where the stress on the wall exceeded
9 that, then we did a more detailed calculation that considered
10 the contribution of the reinforcing steel.

11 Q Did you use actual material values?

12 A Yes, we did.

13 Q The average of the actual material values?

14 A That's correct.

15 Q And was this 28 days or 60 days?

16 A Yes.

17 Q Which one?

18 A I'm not certain of the particular mix used in this.

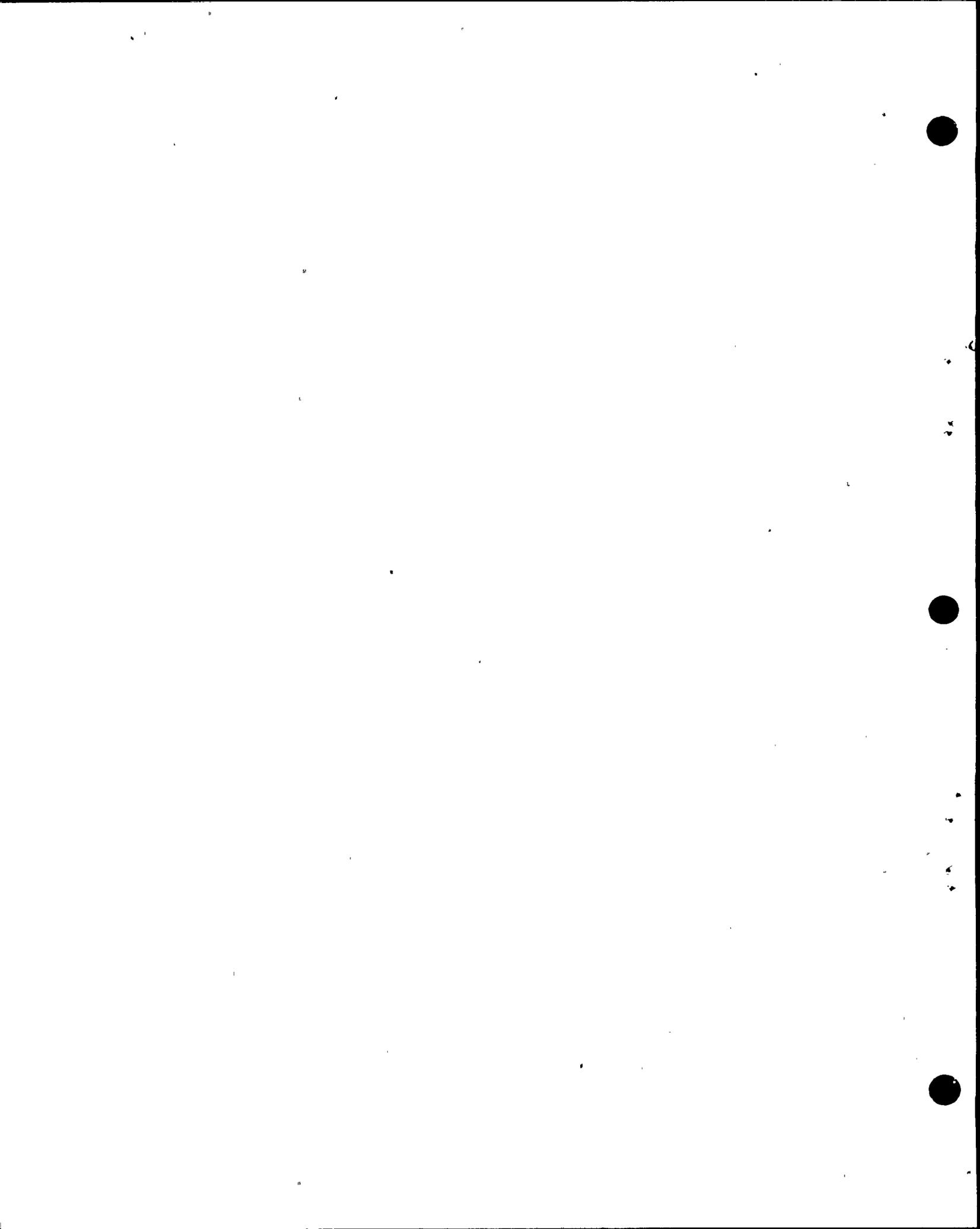
19 We could look it up:

20 (Pause)

21 28-day strength.

22 Q Well using the code minimum values for concrete
23 strength and the appropriate capacity reduction factor what
24 would the allowable shear stress be?

25 A Well if you were to take a given wall composed of



1 concrete and reinforcing steel, the equation 2 times the
2 square root of F-prime C plus PFY yields the total shear
3 capacity of that wall. That equation is relatively insensi-
4 tive to the concrete strength.

5 We made a calculation that showed that using the
6 24-inch wall, No.9's at 12 each way, increasing the concrete
7 strength 20 percent from 3000 to 3600 increased the shear
8 capacity of that wall 2 percent because of the major contri-
9 bution of that steel reinforcing to the strength of the wall.

10 A (Witness Blume) And also due to the fact that
11 the F-prime C, or the 28-day strength value, comes in as a
12 square root in a shear calculation.

13 Q So then the results are much more sensitive to the
14 steel value that is used?

15 A (Witness Lang) The shear stress capacity of a
16 wall would be much more sensitive to the reinforcing steel
17 yield strength.

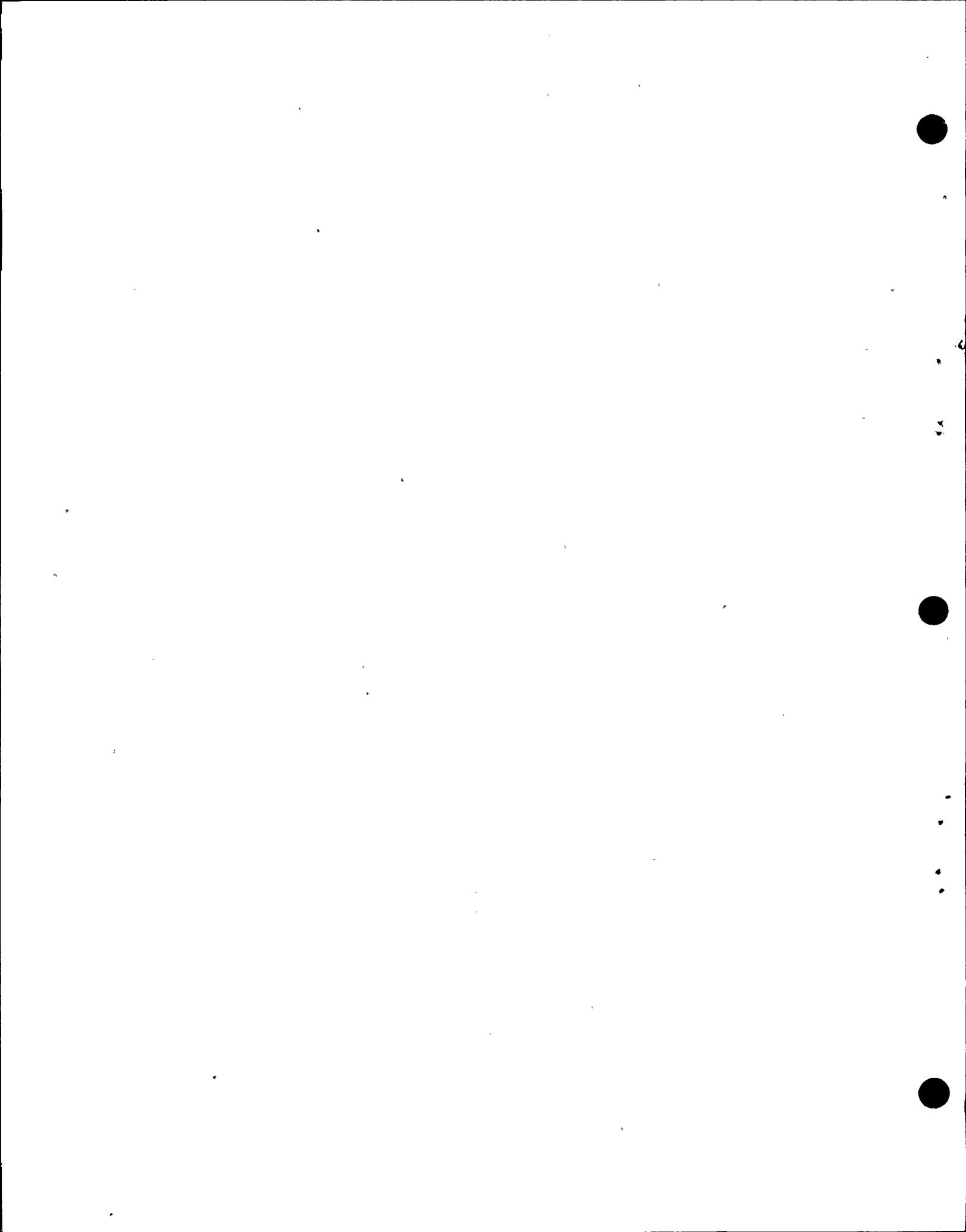
18 Q What is the ratio, then, between the actual
19 material strength and the code minimum for the steel? --for
20 example, for the center pier of the lower wall?

21 A The average used for the intake structure was
22 49.6 KSI.

23 Q 49.6?

24 A Yes. That was a specified 40 KSI steel.

25 Q And what is the code minimum value for concrete



1 strength?

2 A Specified code minimum, 3000 psi.

3 A (Witness Blume) I should explain: K is 1000
4 pounds, for the record.

5 Q So the code minimum, then, is 40,000? For the
6 49,600 the code minimum is 40,000?

7 A (Witness Lang) Yes.

8 Perhaps "code minimum" is the wrong word; the
9 specified minimum by the designer.

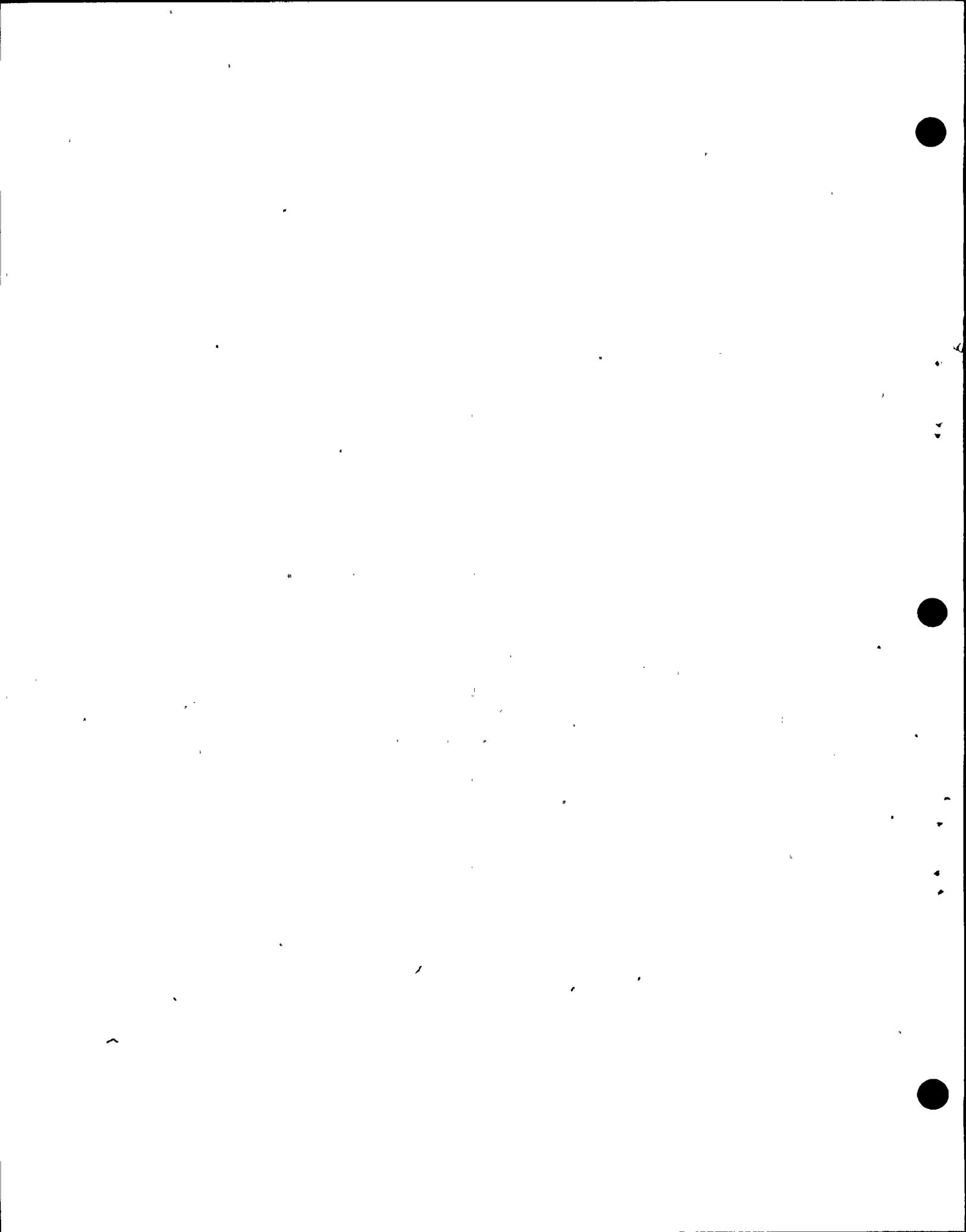
10 Q So you picked up approximately 25 percent,
11 9600 above the 40,000?

12 A (Witness Blume) I don't think we picked up
13 anything. We just used the actual values.

14 Q Well you increased your allowables by approximately
15 25 percent.

16 MR. NORTON: Mrs. Bowers, I've try to clear this
17 up in the last panel. Mr. Kristovich insists on ascribing a
18 number to the code as an allowable. And these witnesses have
19 told him over and over and over that that's not the way it's
20 done. It's an improper question, it's a misleading question.

21 MR. KRISTOVICH: Mrs. Bowers, I believe yesterday
22 we were talking about something different. Now we're talking
23 about minimum values for concrete strength; we're not talking
24 about code minimum values for stress. They are two distinct
25 things.



1 MR. NORTON: Well, Mrs. Bowers, I think the
2 record is very clear that counsel keeps talking about code
3 numbers and the witnesses keep talking about values you
4 arrive at from in-place materials. And they're not the same
5 thing.

6 MRS. BOWERS: Well I thought the last question
7 went to try to get a percentage here of increase.

8 MR. KRISTOVICH: That's correct.

9 MRS. BOWERS: And how does that relate to the
10 code?

11 MR. NORTON: But, Mrs. Bowers, that's not a
12 percentage of the increase from the code. And the witnesses
13 over there are shaking their heads. The question is just
14 improper. Maybe the witnesses can clear it up for Mr. Kristovich.

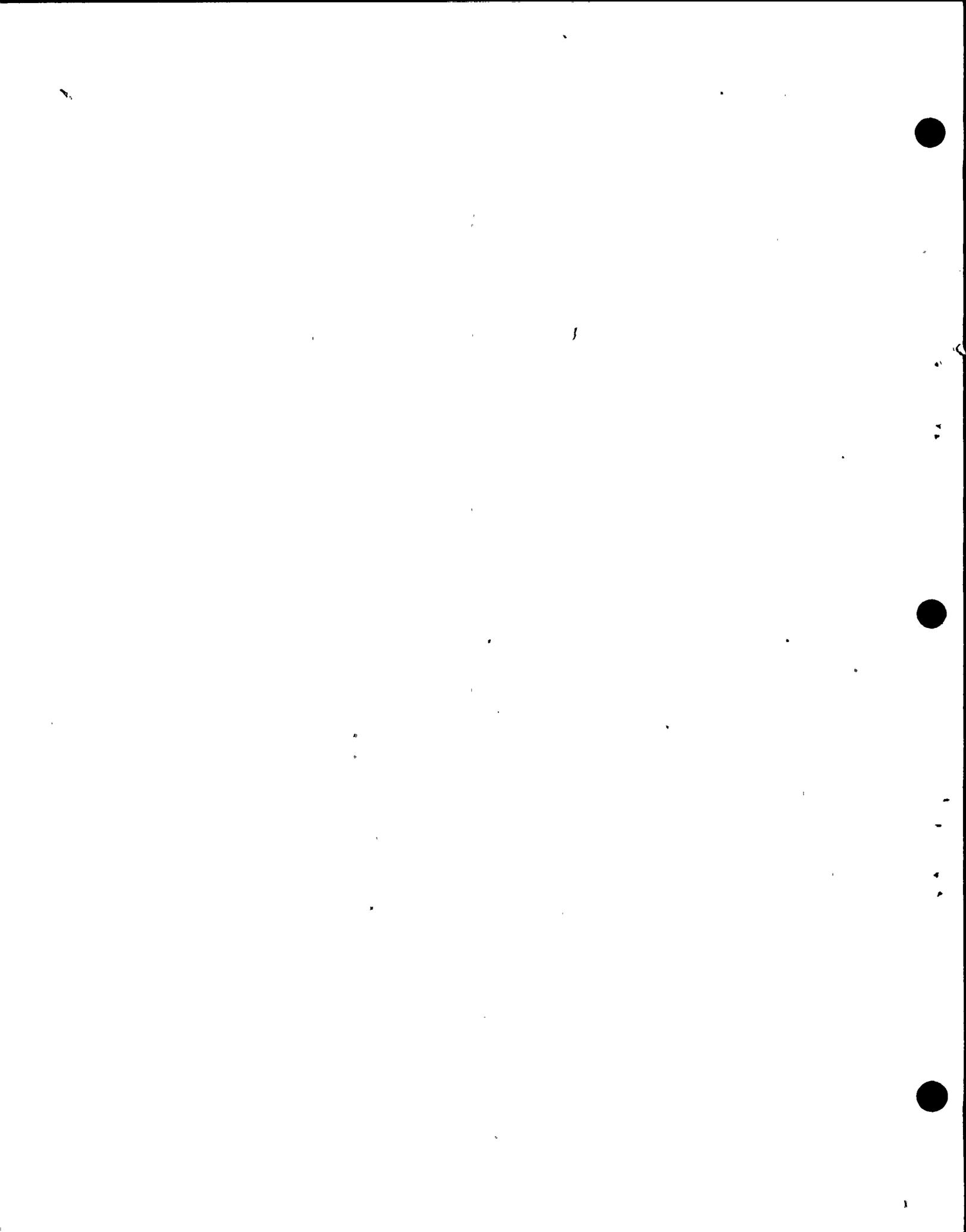
15 MR. KRISTOVICH: Well a percentage increase from
16 the allowable stress.

17 MR. NORTON: But it's not an increase: that's
18 the point. The question assumes a fact not in evidence. It's
19 not an increase.

20 WITNESS LANG: It's an increase over a wrong
21 number, an irrelevant number.

22 MR. NORTON: That's right. We might say it's
23 not a concrete increase.

24 (Laughter)
25



1 BY MR. KRISTOVICH:

2 Q The number which was originally used?

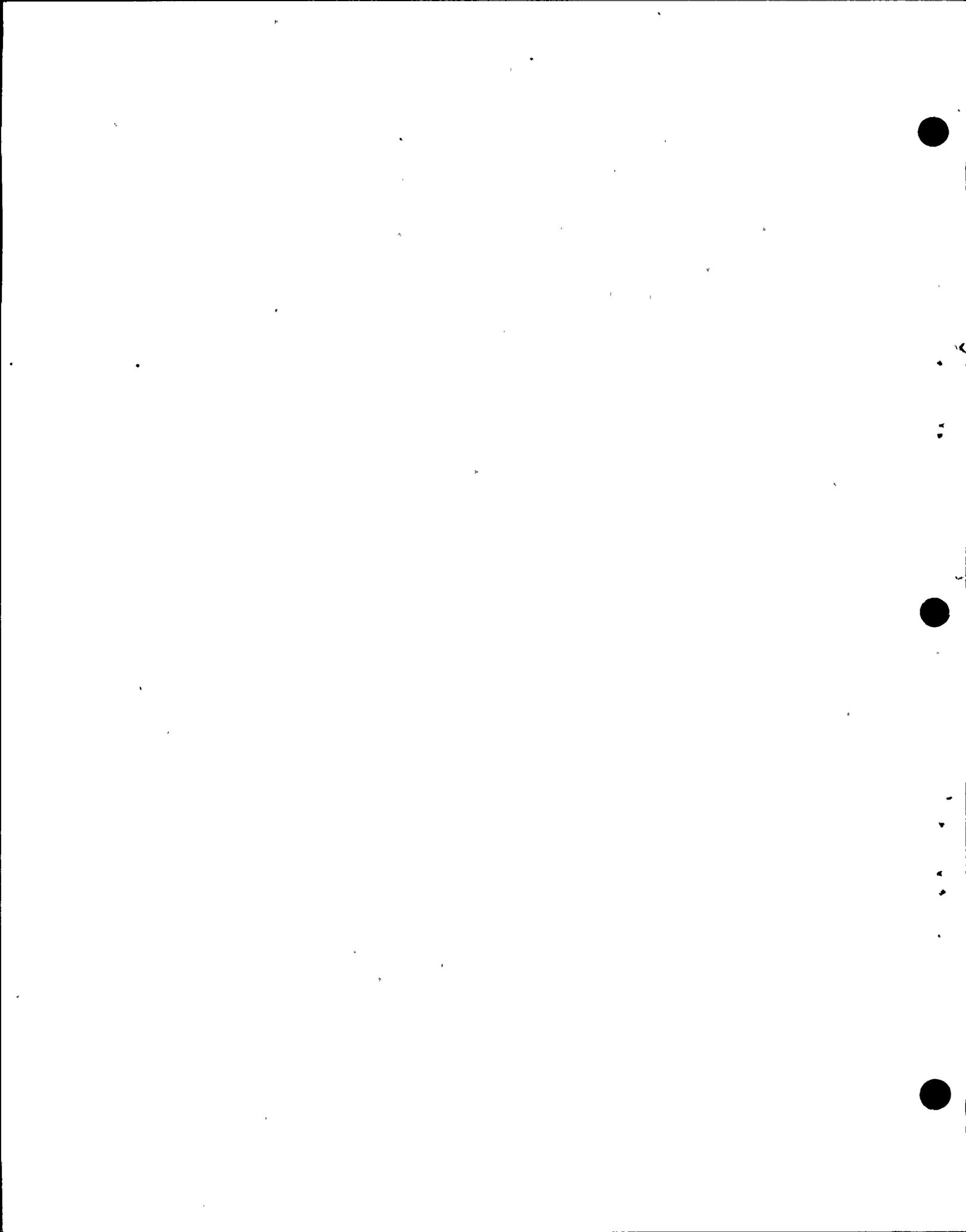
3 A (Witness Lang) It's the number originally
4 specified.

5 Q And used in your analysis?

6 MR. NORTON: Please let Mr. Lang finish his
7 answer.

8 WITNESS LANG: The equations used to compute
9 capacities are based on F-prime C -- excuse me; concrete
10 strength, and the yield strength of the steel. Those
11 equations are based on actual tests of actual strength, not
12 specified strength. To use anything other than the actual
13 strength is wrong.

14 End 1D
15 1E fls
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1 BY MR. KRISTOVICH:

2 Q Directing your attention to Table 3, the third
3 column on Table 3 refers to allowable moment. How do you
4 calculate allowable moment.

5 A There are equations in the ACI that specify the
6 calculation of allowable moment, based on the area of steel,
7 the yield strength of that steel, and the compressive strength
8 of the concrete.

9 Q And what is the sensitivity of this to the concrete
10 strength used?

11 A Typically in underreinforced sections, which we
12 have here very little, it's more sensitive to the steel re-
13 inforcing strength and area.

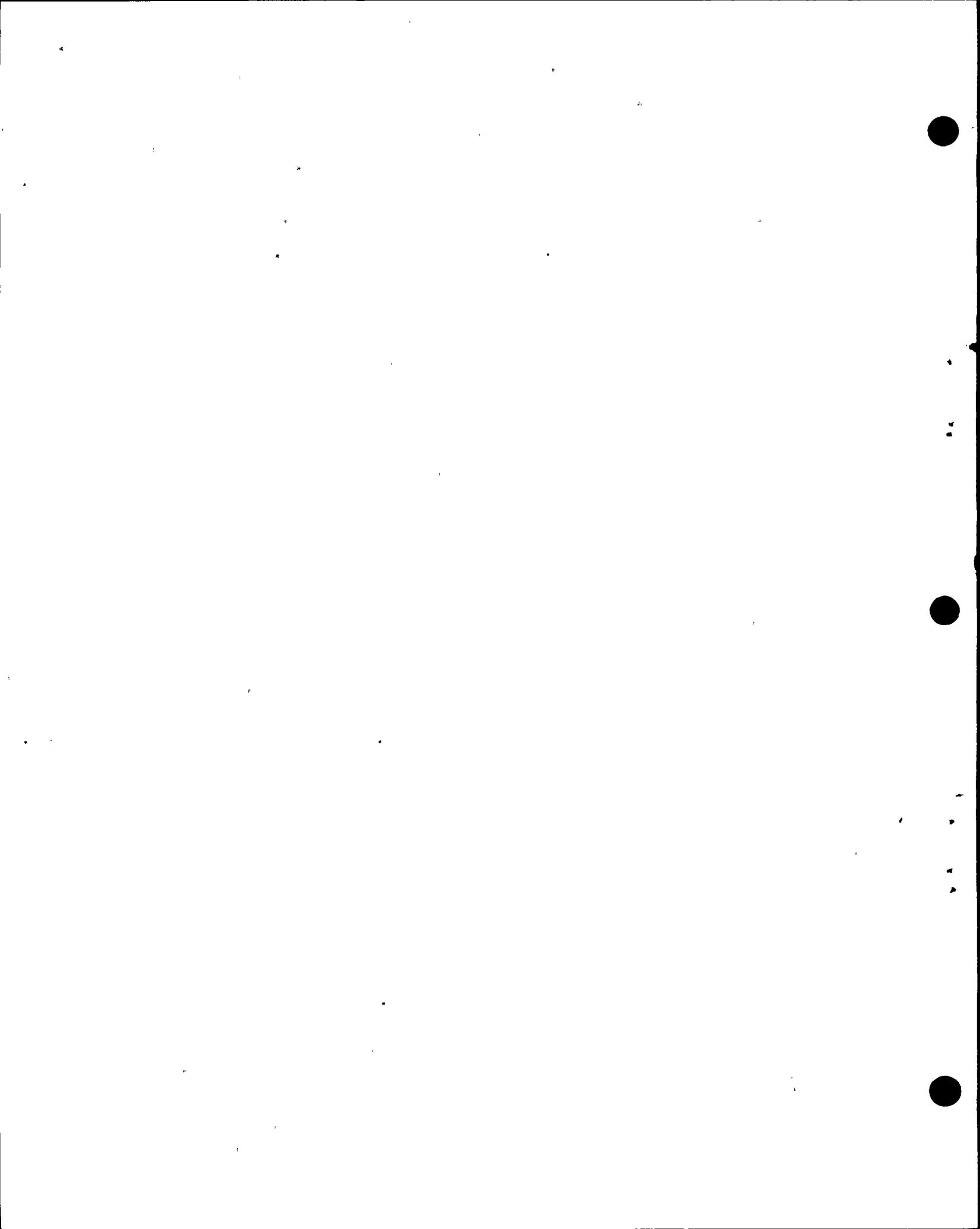
14 A (Witness Bluma) I think I have to explain the
15 term "underreinforced." It does not apply to a deficiency
16 in design, as a layman might think. It's a different type of
17 design of concrete. You can underreinforce, which means
18 that the concrete will control the value or you can over-
19 reinforce which means the opposite. But it has nothing to do
20 with any deficiency in design.

21 Q In these allowable moments, did you use actual
22 concrete and actual steel?

23 A (Witness Lang) That's correct.

24 Q The average of the actual?

25 A That's correct.



wrb/agh2

1 Q Well, referring to lower walls flow straighter
2 front, what was the actual material values for concrete that
3 were used?

4 A The same value used for the whole structure, I
5 believe, 3,630 psi.

6 Q And was steel also used in coming up with the
7 1,726?

8 A That's correct.

9 Q And what would be the actual material value?

10 A 49.6 KSI.

11 Q And is this steel that has a minimum strength of
12 40 KSI?

13 A This is a steel that has a specified -- the designer
14 some years ago, many now, I guess, specified 40 KSI yield
15 steel.

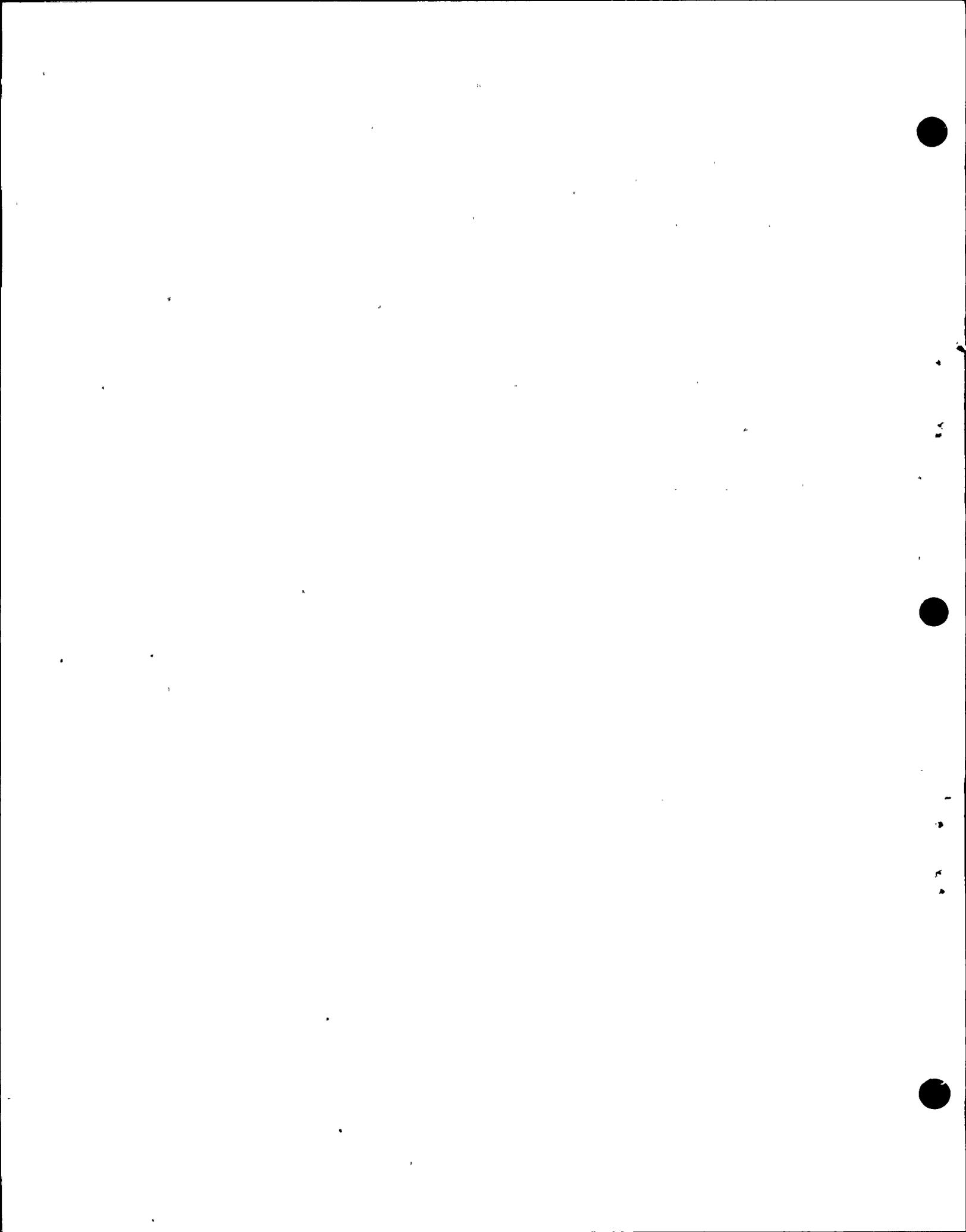
16 Q Just to clear something up, in the FSAR when
17 the use of the phrase "actual material properties" is used,
18 do you mean the average of actual material properties? Is
19 that how you're using that phrase?

20 A (Witness Gnic) Your citation there is to the
21 FSAR, or -- I believe, or more properly to the Hosgri report?

22 Q Yes.

23 A In that case, the answer is yes, it means the
24 average of the actual material properties.

25 A (Witness Blume) I would like to remind you that



wrb/agb3

1 in my direct testimony of the other day, last week or so, one
2 of the many conservative factors that I mentioned was this
3 matter of specification of materials.

4 When you specify a concrete strength or a steel
5 yield point or a steel ultimate, the supplier is under
6 tremendous burden if he should fail to qualify. The net result
7 is that he overprovides, so that very few, if any, samples
8 will test below the specified limit. The result is the
9 average value you obtain is far more than the specified amount.

10 Q What did you use for damping for the steel?

11 A 7 percent.

12 Q And for the concrete?

13 A 7 percent.

14 MR. KRISTOVICH: WE have no further questions.

15 MRS. BOWERS: Mr. Ketchen?

16 MR. KETCHEN: One moment, Mrs. Bowers.

17 (Pause.)

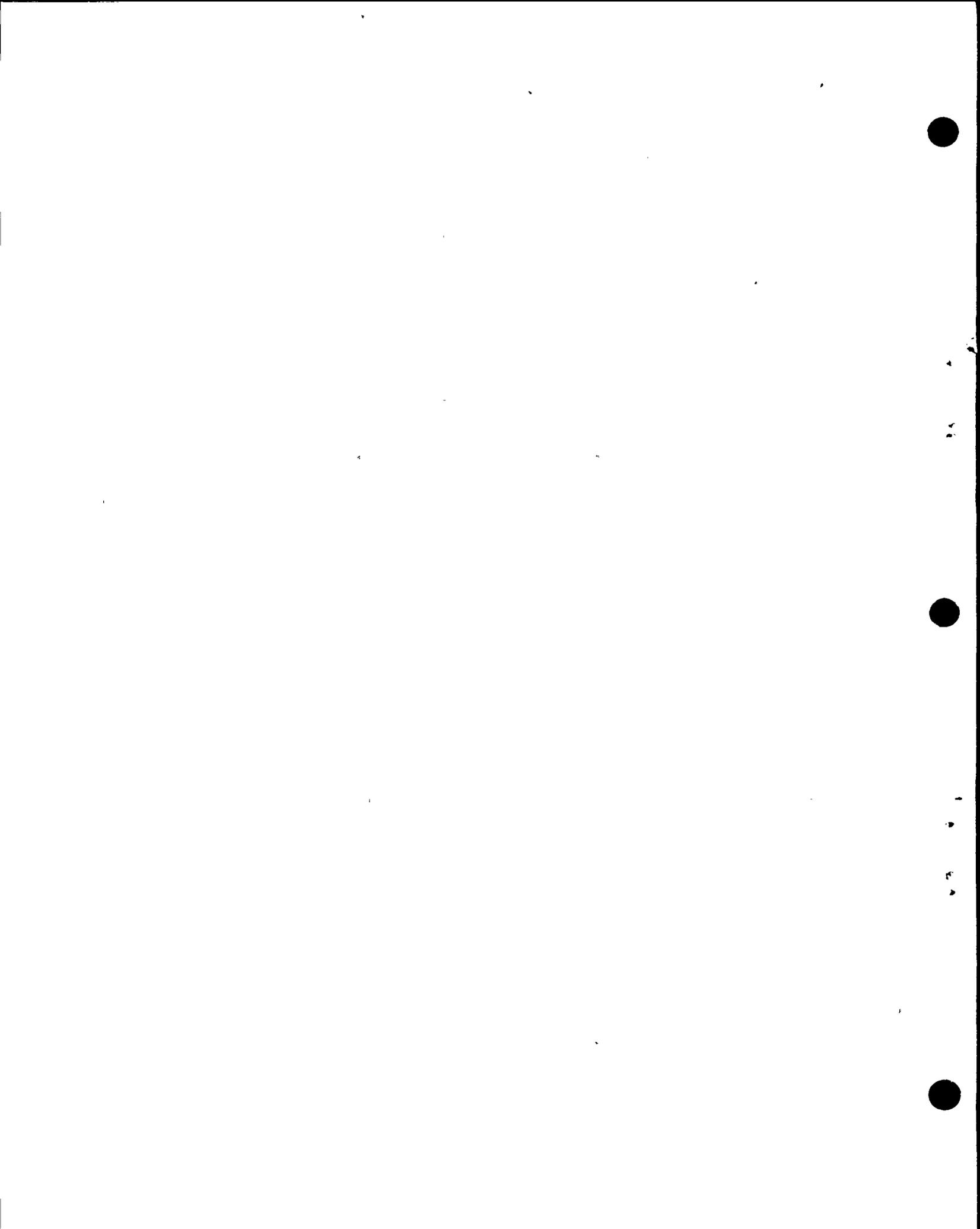
18 MR. KETCHEN: The Staff has no questions, Mrs.
19 Bowers.

20 EXAMINATION BY THE BOARD

21 BY DR. MARTIN:

22 Q I notice at the top of Page Two, the sentence
23 beginning in the middle of Line Four:

24 "...assumed that no water would flow
25 into or out of the structure during the north-south



1 earthquake motion."

2 What period of time does that north-south
3 earthquake motion cover?

4 A (Witness Lang) Well it would be consistent with
5 the other analyses, approximately 24 seconds.

6 Q A fraction of a second?

7 A No, the earthquake extends for 24 seconds.

8 Q Oh, all right. I thought you said 0.24, excuse
9 me.

10 A (Witness Bluma) The strong motion part of an
11 earthquake, an actual 7.5, might last as long as a minute,
12 but much of that would be very tiny vibrations. The strong
13 motion is about 24 up to 25 seconds expected.

14 Q So in actuality, if the pumps are going full
15 speed, quite a bit of water could actually enter, is that
16 right?

17 A (Witness McLaughlin) I think there is some
18 confusion here, because --

19 Q Yes, I'm confused.

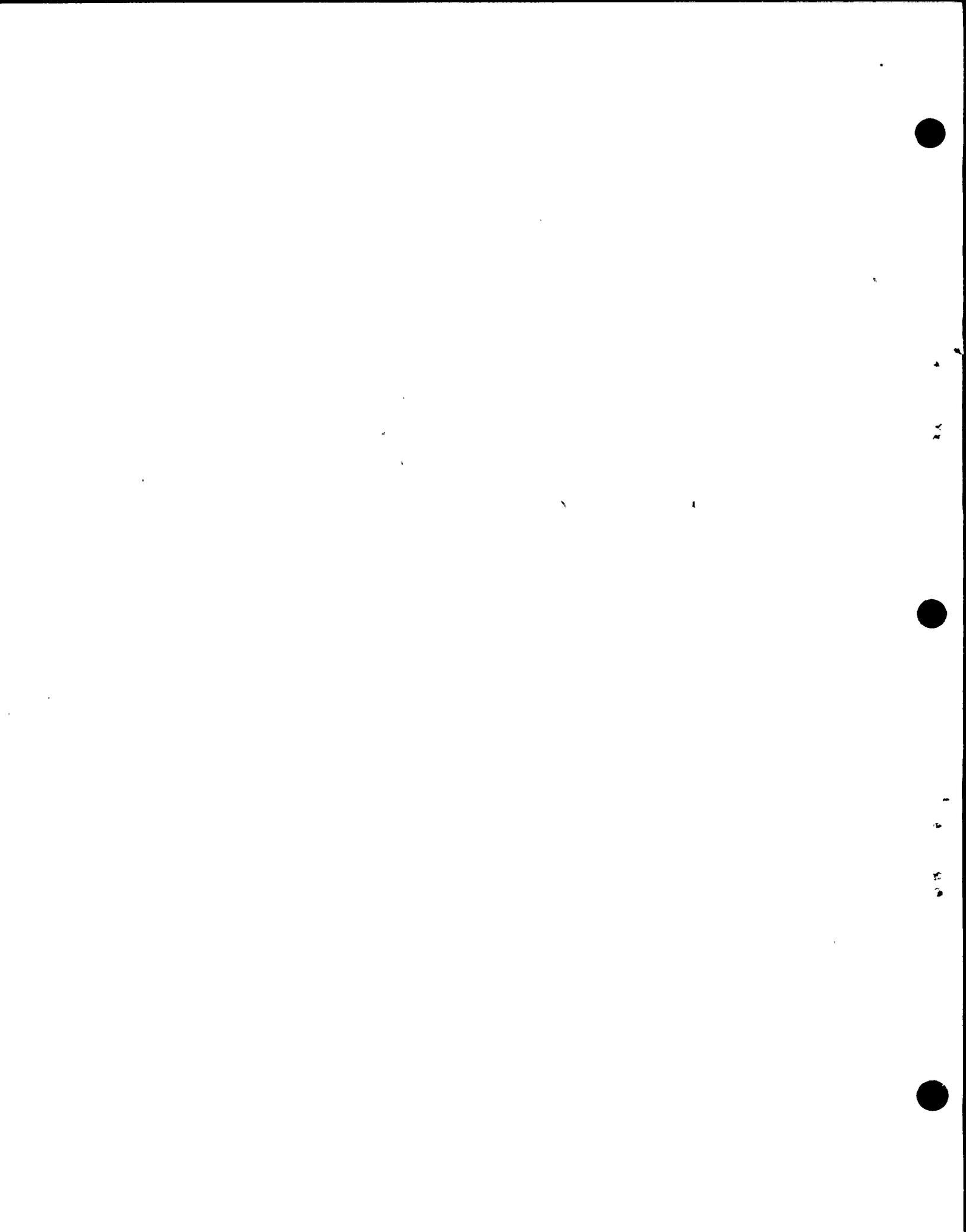
20 A Perhaps Mr. Lang could answer this better.

21 Q I'm trying to understand the implication of this
22 assumption.

23 A (Witness Lang) This assumption has nothing to do
24 with pump operation. The assumption refers to the mass
25 considered in the structure during the seismic analysis.

arx/agb4

C6



wrb/agb5

1 Q Oh, I see.

2 So you might have said that you'd assume the mass
3 of water in the intake structure is constant during this
4 period of time.

5 A Exactly.

6 Q Okay, so there's no change in the mass of water.

7 A That's right.

8 Q And I'm getting a little bit ahead now, but I
9 notice in the next item of testimony dealing with tanks and
10 so on, that consideration was given to the interaction between
11 the tank and its contents.

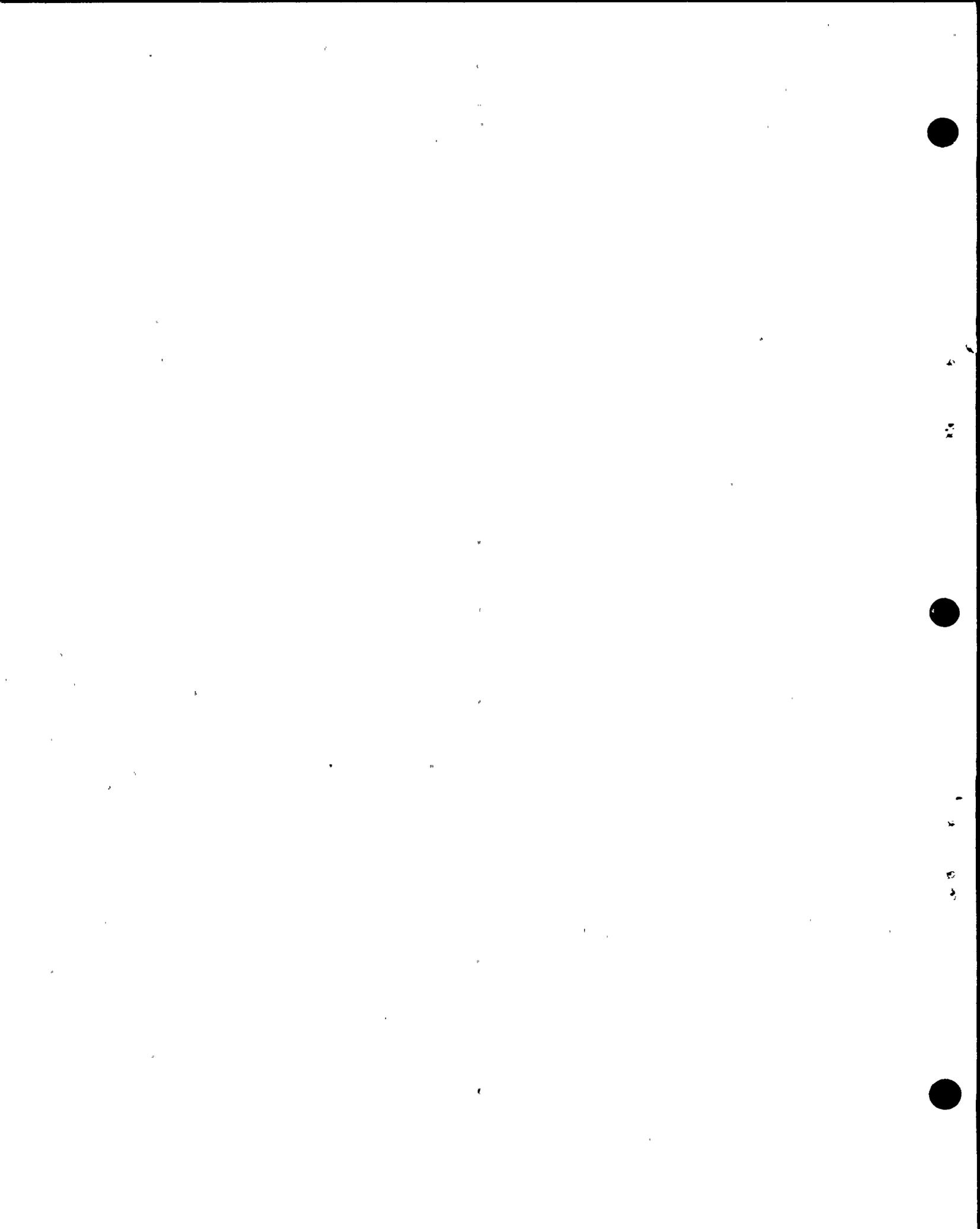
12 A Right.

13 Q And I see no evidence here that there is any
14 consideration of the interaction of water in the intake
15 structure with the structure itself.

16 A Well the configuration is significantly different.
17 In the storage tanks, the water, or the mass of the water
18 plays a much greater part relative to the structure. In this
19 case, the water is relatively minor.

20 We did do some hydrodynamic analyses which showed
21 that the sloshing action of the water inside the structure
22 did not cause any significant stresses.

23 Q Well this is what I was thinking about. It
24 seemed to me that water would behave differently from a more
25 rigid material.



wrb/agb6

1 So the reason it's left out is you did do some
2 analysis and found out it wasn't significant; so in further
3 studies you didn't include it?

4 A That's correct.

5 Q Okay. Thank you.

6 Oh, one other thing:

7 In the direction of spalling that you're talking
8 about, is this spalling that's normal to a wall, or is it
9 more like the kind of spalling you'd see from a cliff that
10 would occur at the end of the structure? In other words, in
11 the plane of the wall.

12 A (Witness Ghio) Well the walls that we're talking
13 about that may experience some spalling are oriented with
14 their long axis parallel to the incoming water flow, and the
15 spalling occurs from the sides of those walls.

16 Q It's normal to the long plane of the wall.

17 A That's right.

18 Q Okay.

19 A (Witness Blume) If there were any spalling at
20 all, which I doubt at these ductilities, it would be a flaking
21 type thing normal to the wall. It would fall off and drop
22 off.

23 Q Okay. I was trying to get that clear as compared
24 to spalling along the long action where pieces at the end of
25 the wall might fall off into the water at the intake. But



wrb/agb7

1 you're always talking about this flaking along the surface
2 of the wall.

3 A Yes.

4 Q It's not an actual chunk at the end that falls
5 off in that direction.

6 A If you can imagine a minor crack falling and
7 little pieces might flake away from that crack, and the crack
8 would be undoubtedly -- if it occurred at all, would be
9 parallel to the wall, therefore, the flakes would be falling
10 off normal from the wall.

11 Q Could this occur to such an extent that the wall
12 might fail, or is it retained by its binding with the surrounding
13 rock?

14 A At these ductilities, we are nowhere near failure
15 of the wall. A wall can contain very massive cracking
16 without actually falling apart. It's heavily reinforced and
17 it's held together.

18 Q What you're talking about really is cosmetic
19 damage, rather than any structural damage?

20 A That's correct.

21 Q Okay. Thank you.

22 BY MRS. BOWERS:

23 Q One term that's been used several times "audit"
24 discussions, and I'm not sure exactly what's meant by that.

25 A (Witness Ohio) Well Mrs. Bowers, "as a part of the



wrb/agb8

1 NRC Staff's review, detailed review, comprehensive and detailed
2 review of the materials that support the analyses that we've
3 summarized that we've been testifying to, the Staff undertook
4 to review the supporting calculations in great detail and
5 depth. And they visited with us for some time at our locations
6 and at the locations of our consultants to review and discuss
7 the manner in which we implemented the criteria here. And a
8 reference to an audit discussion is a reference to those
9 series of meetings.

10 Q I thought that was what it meant but it had never
11 been explained.

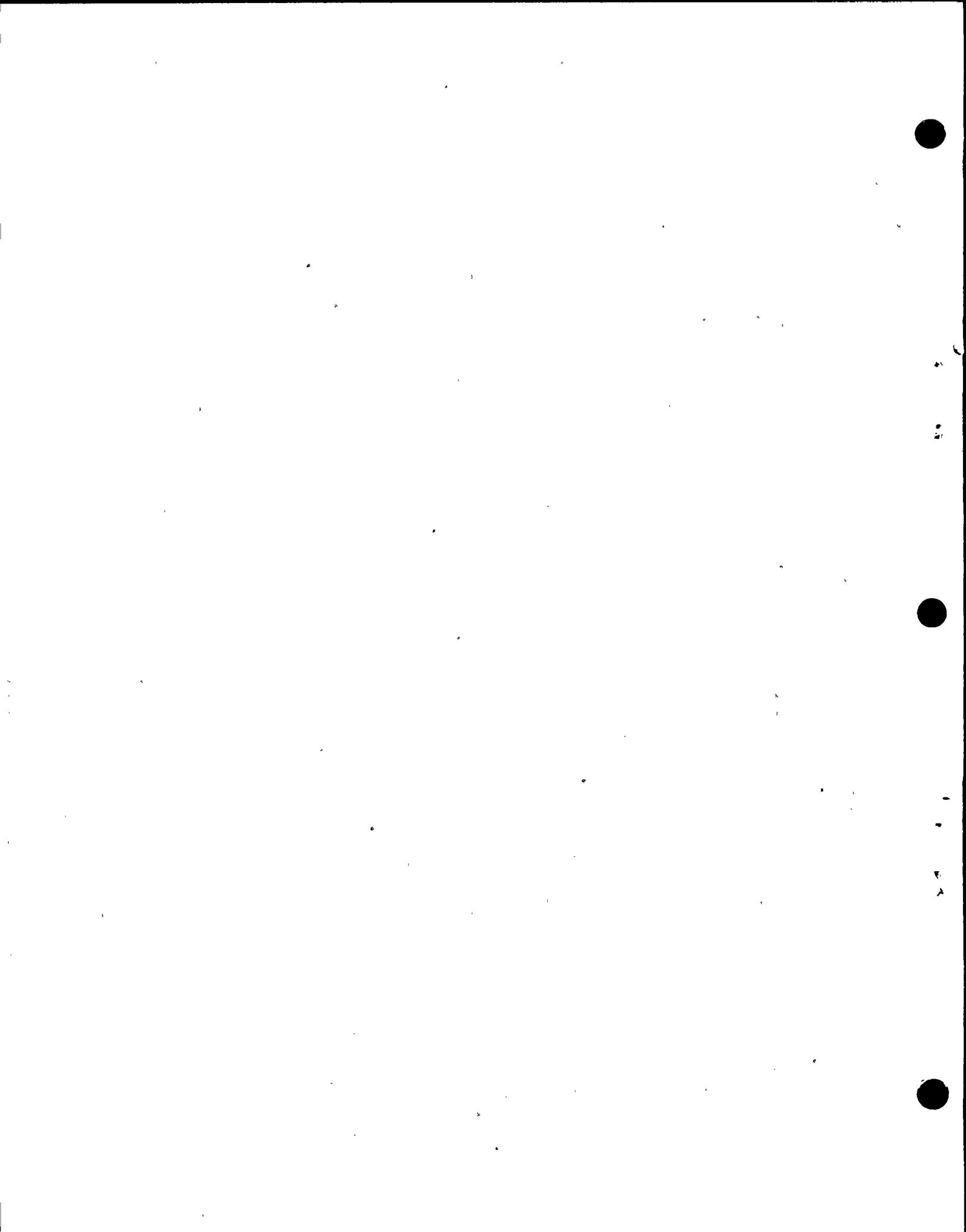
12 MRS. BOWERS: The Board has no further questions.

13 MR. NORTON: Mrs. Bowers, I would like to ask a
14 couple of questions, and I think these are more for the
15 benefit of perhaps future readers of the record than they are
16 perhaps for this Board. And they have to do with the types
17 of analyses that are specific to this particular structure
18 we're talking about, but my questions go to all analyses
19 really and I can use this as a vehicle, I think. These
20 questions are probably directed at Dave Lang and Dr. Blume.

21 REDIRECT EXAMINATION

22 BY MR. NORTON:

23 Q There were questions asked of you regarding, I
24 believe, the analysis you did on the intake structure showing
25 a margin of safety of 1.01, and then the analysis was done --



wrb/agb9

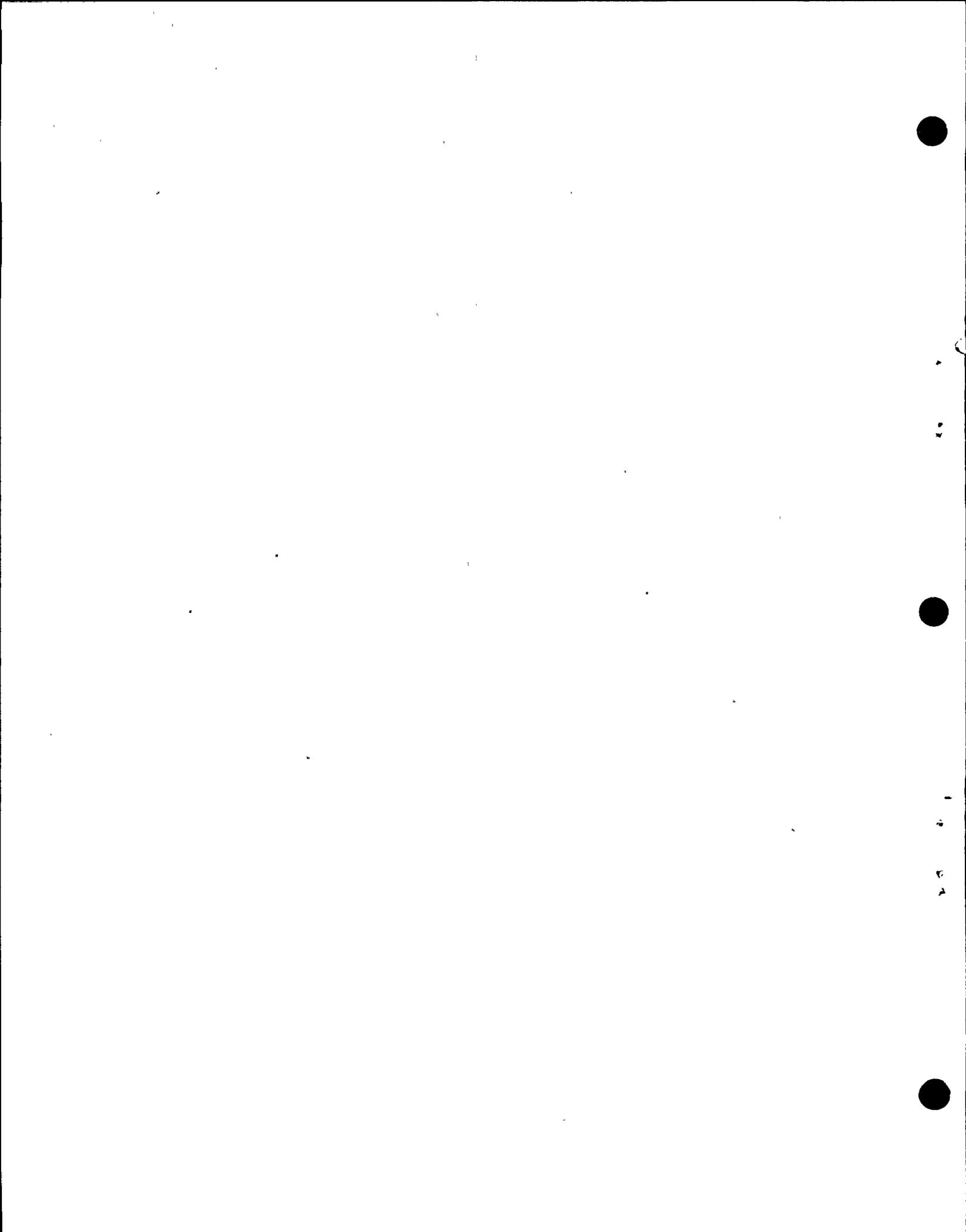
1 a different analysis was done increasing that margin of safety,
2 I believe, to -- I forget the number now, 2 point something,
3 I forget what it was.

4 As a layman, I sometimes get the impression that
5 when you do an analysis and you come up with a margin of
6 safety of 1.01, somebody says well, gee, that isn't very
7 good, so you go out and you sharpen your pencils and you
8 really don't do anything but come up with a different number.

9 I'd like you to respond to that kind of a
10 question. What kinds of analyses are you doing where you
11 increase those margins of safety? Are you actually -- is the
12 analysis increasing the margin of safety or not?

13 A (Witness Blume) I think what's happening here is
14 a series of iterations or trials where often a designer or
15 an analyst will do a rather quick, economical analysis first
16 and using conservative assumptions. And if he finds under
17 those conditions that he's got what he considers an adequate
18 margin, he knows that he's got the problem covered and he
19 stops.

20 However, if he reaches a margin that is unsatis-
21 factory to him or to a reviewer, he then naturally, instead
22 of going out and modifying the structure on such a crude
23 analysis, instead he goes into the matter in great detail and
24 considers the factors that previously he had either ignored
25 or assumed very conservative values for.



wrb/agbl0

1 And on the second go-round, such as happened on
2 this intake structure -- in fact, there may have been three
3 of them -- as you can see, as you get into more and more of
4 the fine detail and analyze it very, very carefully, you'll
5 find that you're improving your safety factor because you're
6 simply getting closer to the real fact.

7 Q Okay but you're not really improving the safety
8 of the structure, or you're not really improving the safety
9 factor. That's an absolute.

10 A The structure exists, all we're doing is getting
11 closer to an estimate of what it's like.

12 Q All right.

13 So what you're saying then is the first run you
14 take at it is where you use all the conservatism, and if it
15 comes in, if the numbers come out in acceptable fashion there,
16 you forget about it.

17 A Right.

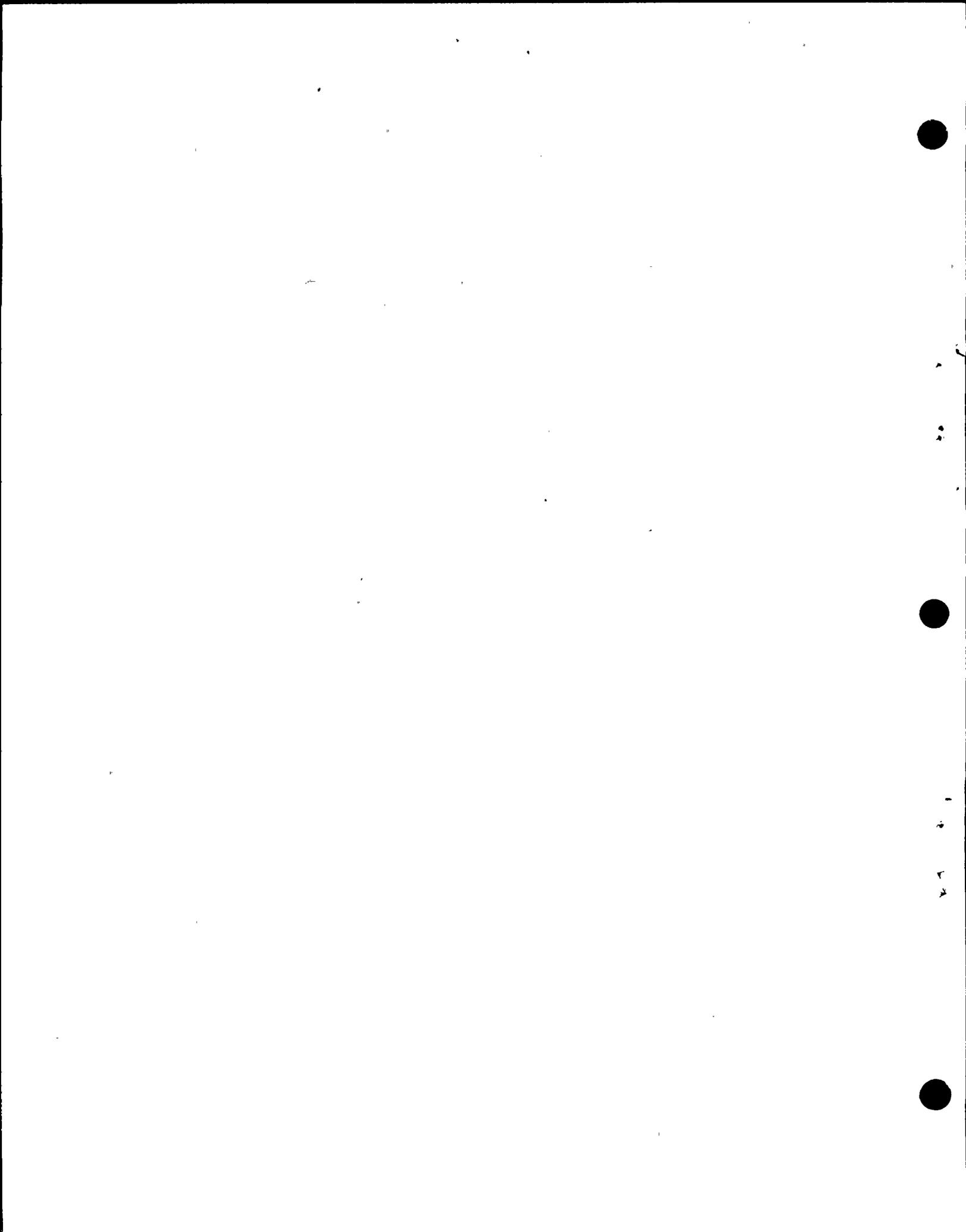
18 Q But that's not to say that the structure is somehow
19 less safe because it doesn't come in?

20 A That's absolutely correct.

21 Q All right.

22 And the analyses you've done and we've talked
23 about here for the last two days, I take it, have varying
24 degrees of conservatism in them.

25 A Yes.



wrb/agbl1

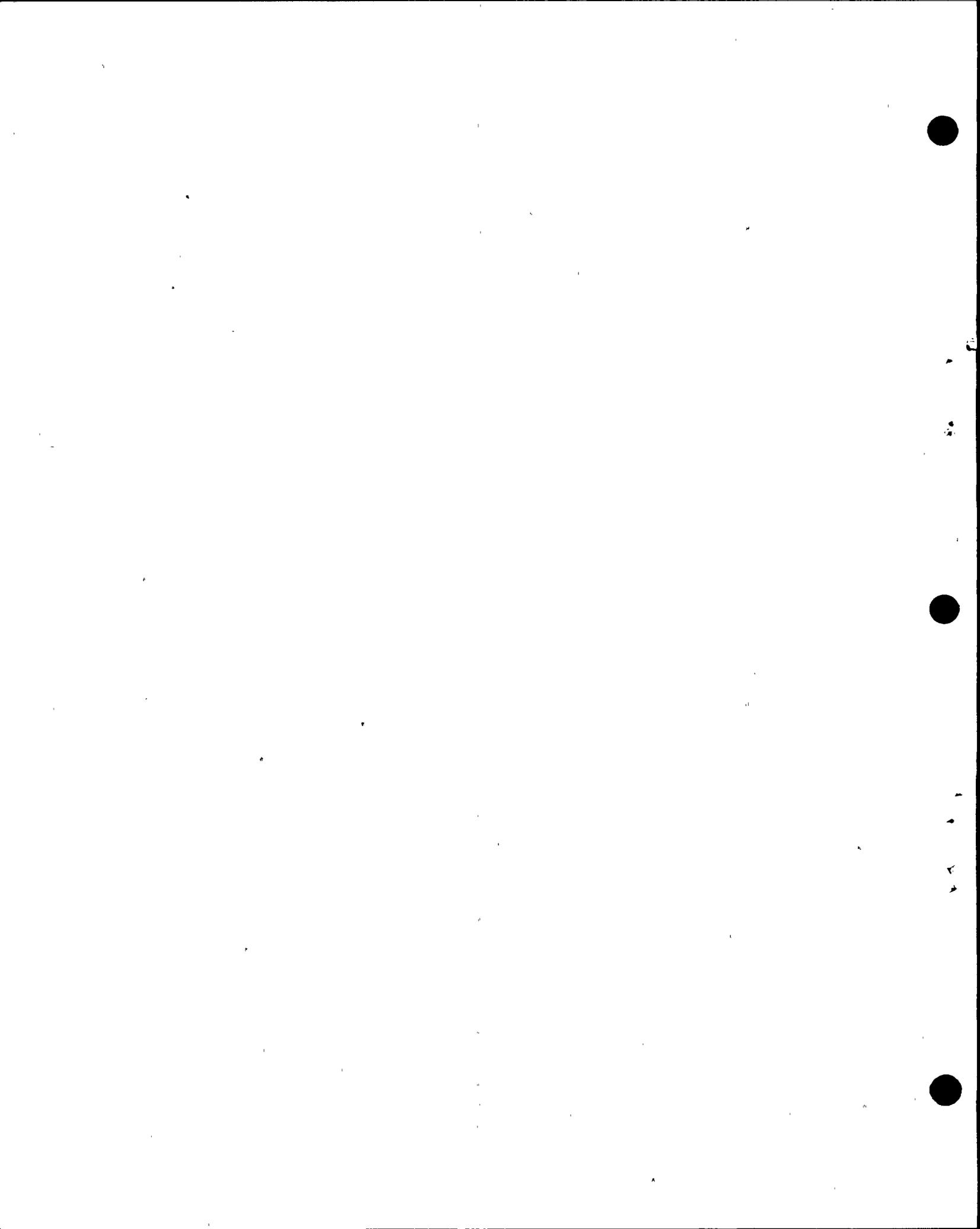
1 Q And the reason some of them have more than others
2 is because even with those large conservatisms, they come in
3 with large margins of safety, is that right?

4 A Right.

5 Q Now one other thing that really is for the record,
6 I think, and that is that we've talked about average material
7 strength and then you were asked questions about the scatter
8 of data, and I again don't remember exact numbers, but I think
9 in some of the concrete samples we were talking about numbers
10 that ranged from a low of, say, a number like 6000 to a high
11 of a number like 7200 and you get an average of, say,
12 65- or 6600, for example.

13 Why do you not use the low value for your analysis?
14 And the reason I ask the question is, I think of the old thing
15 about the chain is only as strong as its weakest link. Why
16 do you not use the low value?

17 A It would be unrealistic to use the low values,
18 the one basic reason being that the material is spread
19 throughout the structure. And these similar tests that are
20 used to determine these values, the averages and the extremes,
21 represent samples from different parts of the structure. And
22 it's all mixed up together. We have to good, the bad and the
23 high and the low and everything in there. So it would be
24 complete unrealistic. We do not have a changed system in this
25 problem.



1 Q Okay. Well I think that's what needs a little
2 more explanation, because if you have a scatter of strength
3 of links in a chain, even though that scatter is spread out
4 through the length of the chain, the weakest link is going
5 to break when you pull on the chain, the weakest link is
6 going to break first.

7 Now why is it when you're talking about a concrete
8 wall that that is not the case, that failure won't occur
9 where you've got some concrete -- in the area where you took
10 your core or you did you sample that is the low part of the
11 scatter?

12 A Because the concrete in the wall represents
13 the whole gamut of the cylinder tests from that wall. It's
14 all mixed up together in that wall, so it's perfectly proper
15 to use the average. It is not a chain situation. It's
16 redundant. I think I can use that word redundant in the sense
17 that the cylinders occur from samples throughout the whole
18 structure.

19

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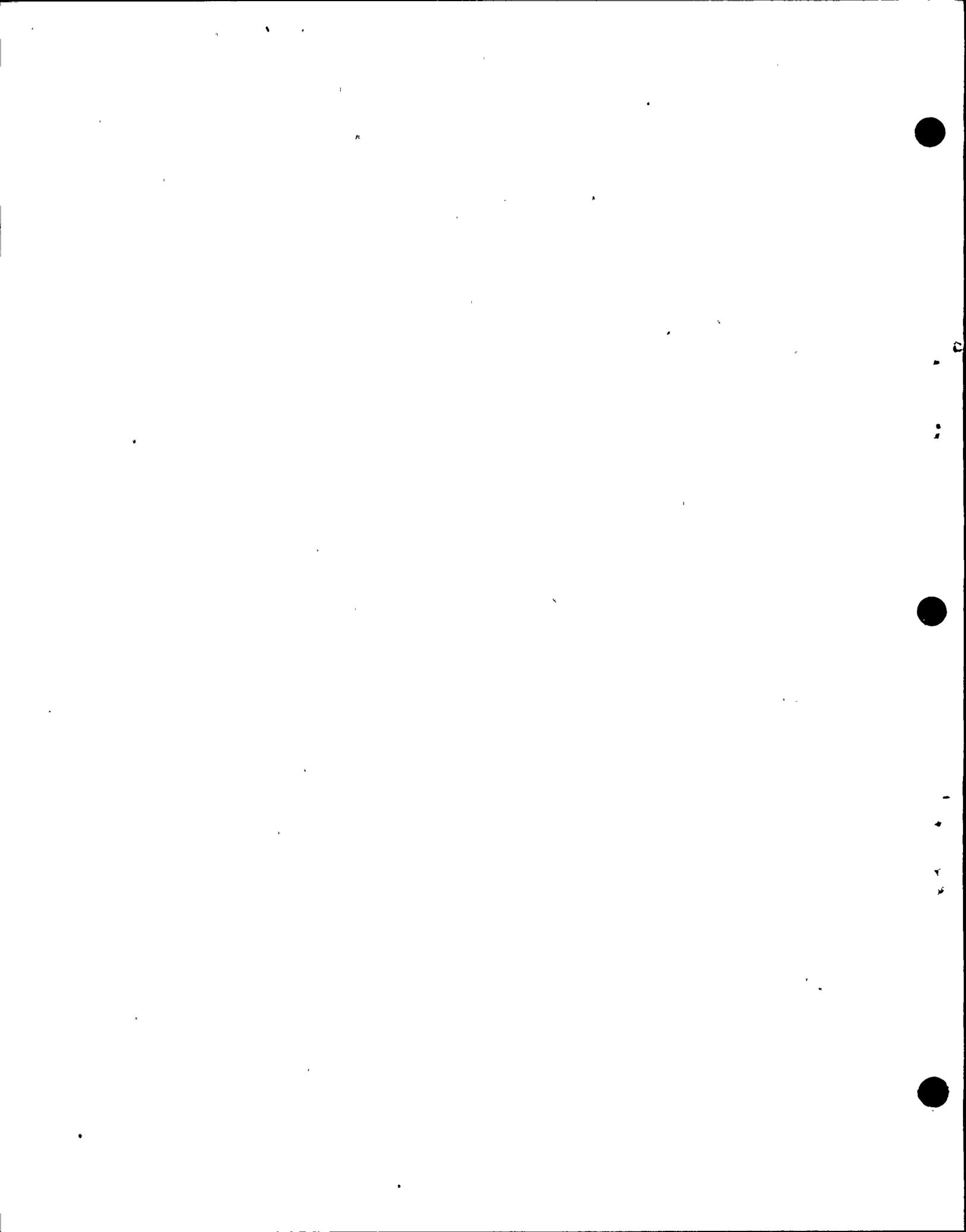
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Q One last thing, and this is specific to Table

2.

If I understand it -- I was a little bit confused at the questions and answers -- but if I understand it, in Table 2, under the allowable shear stress, those figures of 120, they didn't take --

Well, let me ask you this:

Did they take credit for steel in those walls, the steel reinforcing?

A (Witness Lang) No, they did not.

Q Then those numbers would actually be much higher if you did take credit for that, is that correct?

A Probably on the order of the center pier wall, 400, 500, somewhere in that range.

Q Okay.

So you took no credit for steel reinforcing or damping or anything there in terms of the steel?

A That's correct.

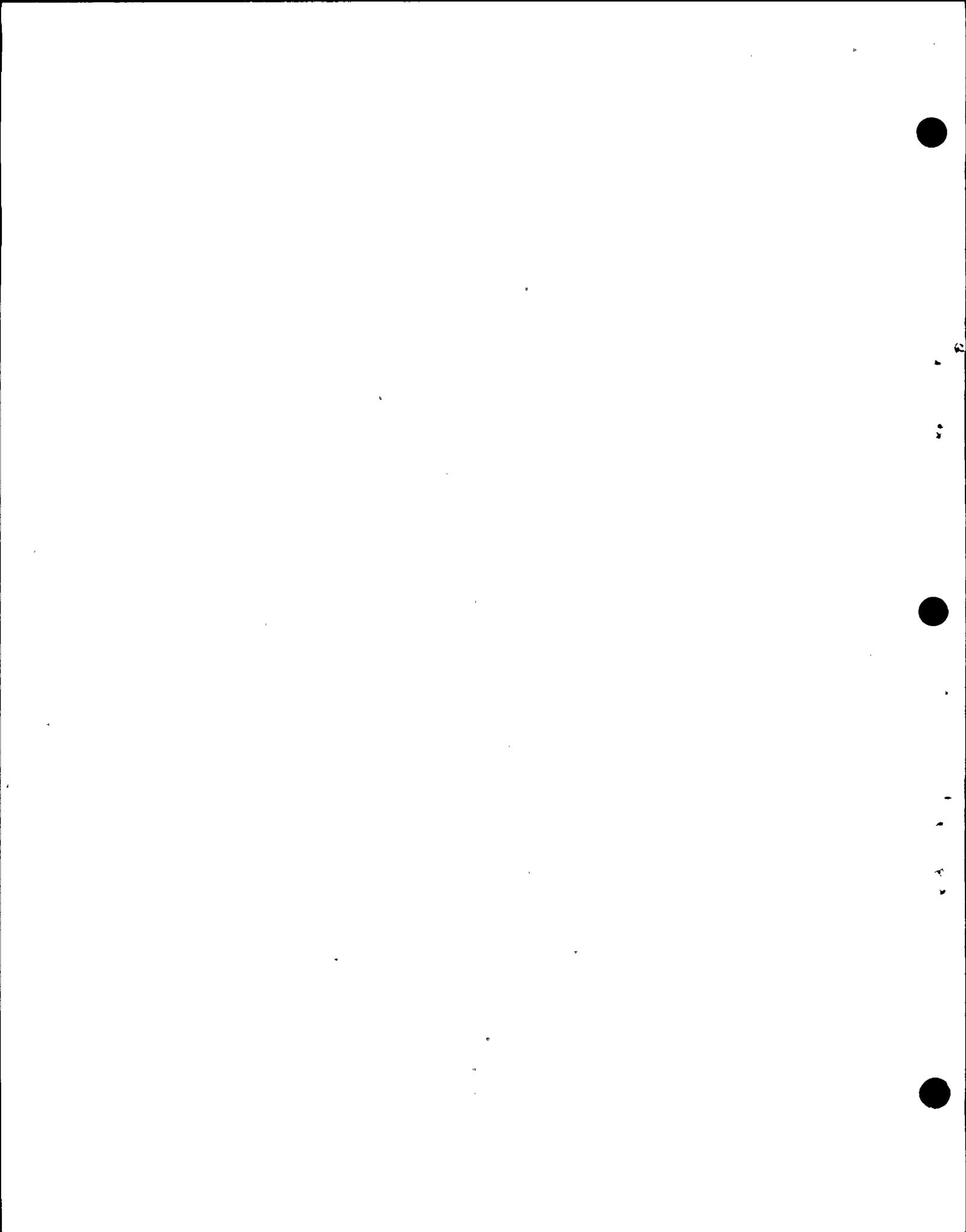
MR. NORTON: That's all I have.

FURTHER EXAMINATION BY THE BOARD

BY MRS. BOWERS:

Q Let's go back a minute to Mr. Norton's questions. If you had cores that ran low, that were in close proximity to each other, would that change the situation?

A (Witness Blume) It would if it were in a single



wel 2'

1 member such as a column or a beam. If you had many cylinders
2 taken from one column, for example, and they all tested low,
3 that would mean that on the job that column would be
4 rejected, taken out and replaced.

5 This is part of field control.

6 But in a wall, if the samples are varying -- and
7 by the way, there's got to be some random variation, it's
8 impossible to get all cylinders to test exactly the same,
9 because of many factors.

10 In the wall you have this mixture. You don't have
11 the situation of a single column or a chain effect.

12 There have been cases in actual jobs, especially
13 in buildings where they may make a pour one day and have a
14 bad load of concrete. That is discovered, and the whole thing
15 is rejected, taken out.

16 BY DR. MARTIN:

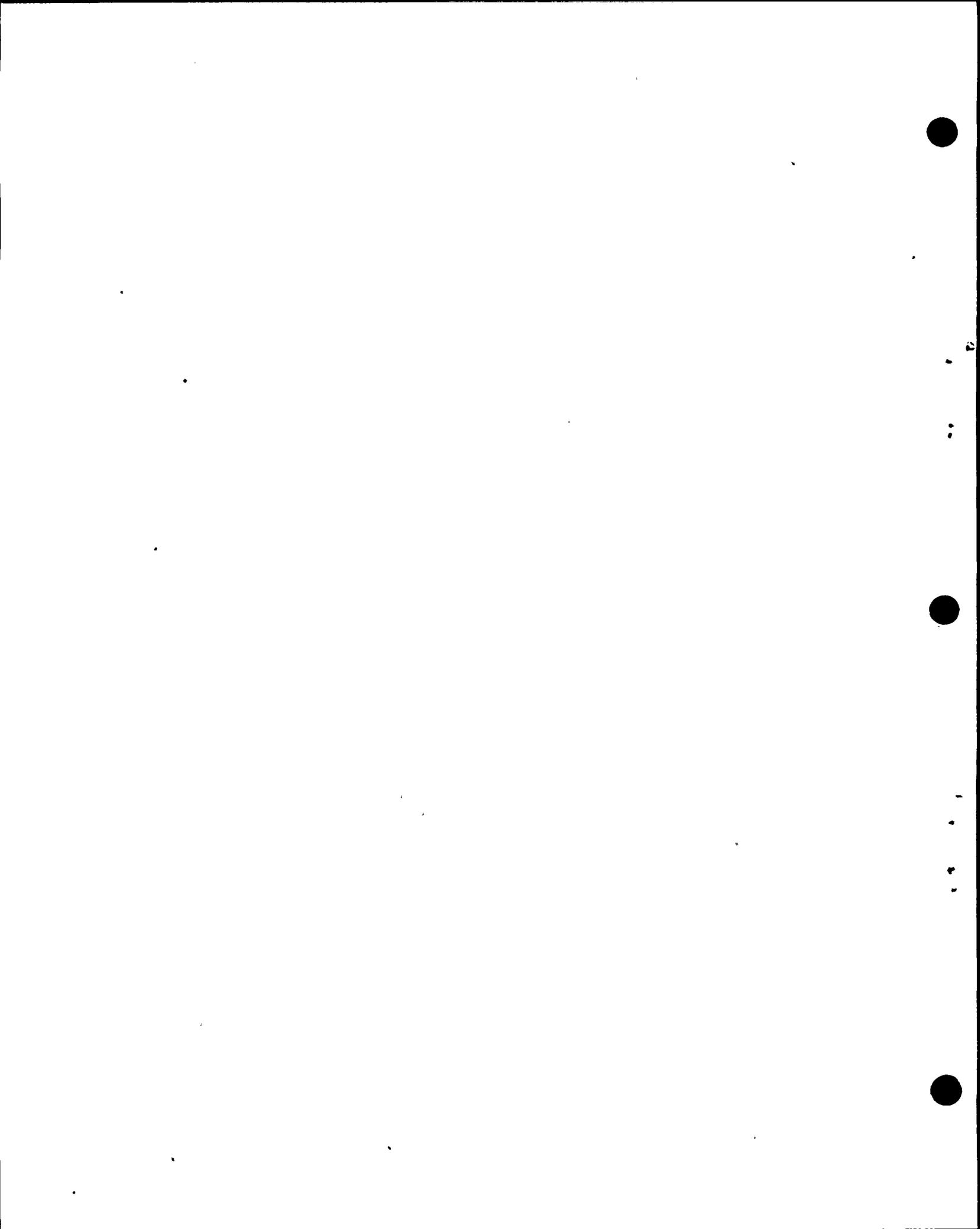
17 Q One additional question:

18 You said there had to be some random variation.
19 Could you give me an idea of a typical coefficient of
20 variation?

21 A (Witness Blume) Yes, we have those calculated here
22 in Report DLL-6. I'll turn to it. Just a moment, please.

23 (Pause.)

24 On page D-6A.3 of Report DLL-6, coefficients of
25 variation are given for the three concrete mixes, A, B, and C,



1 and they range as follows:

2 6-1/2 percent for A; 9-1/2 percent for B; and
 3 7 percent for C.

4 We consider those quite low, and it shows good
 5 concrete control in the field.

6 Q So there's some random variation, but really very
 7 little, as far as its being uniform?

8 A That's right, it's all fairly close to the mean
 9 or the median.

10 DR. MARTIN: Thank you.

11 MRS. BOWERS: Mr. Krostovich?

12 CROSS-EXAMINATION ON BOARD QUESTIONS

13 BY MR. KRISTOVICH:

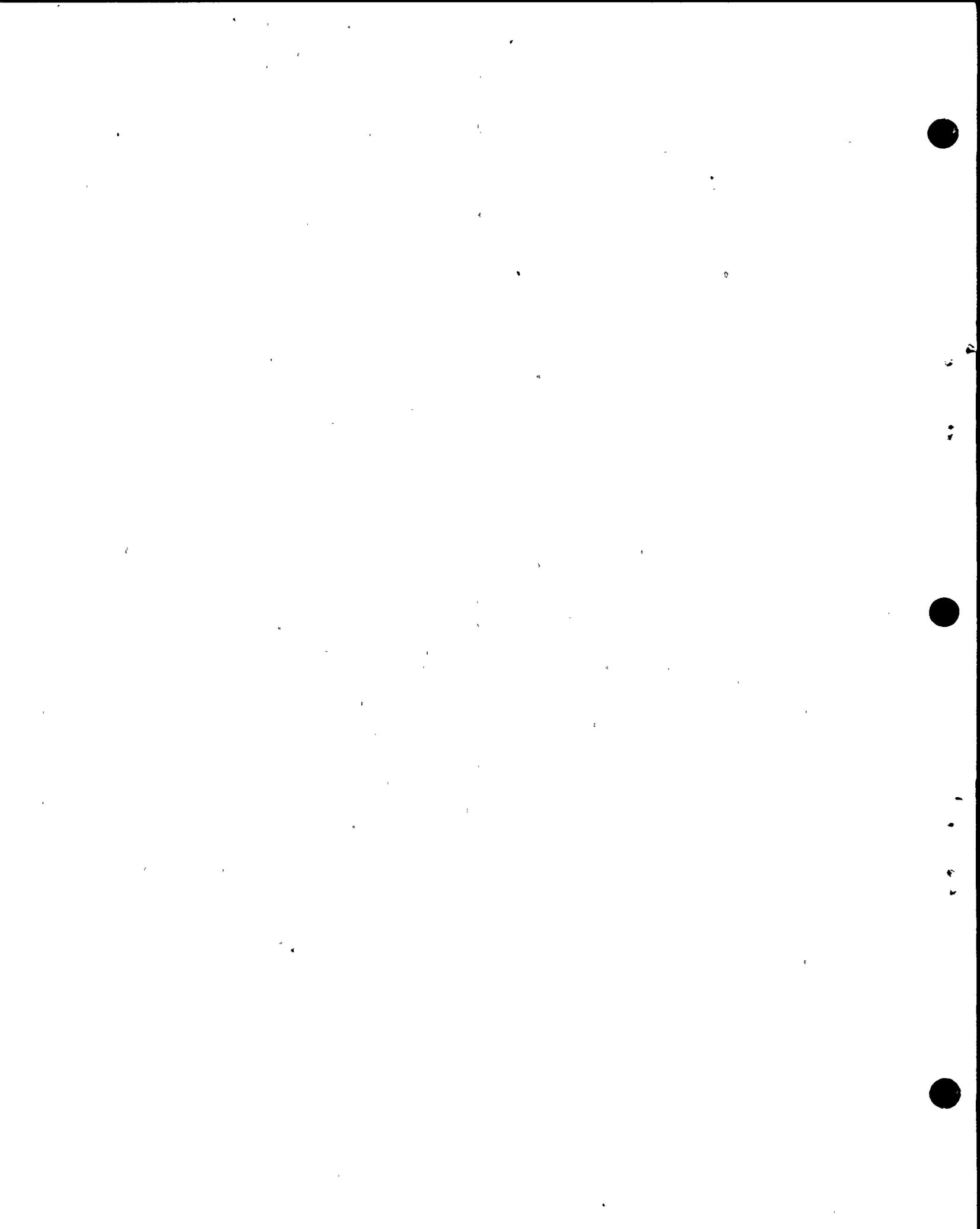
14 Q Dr. Blume, if I heard you correctly in responding
 15 to Mrs. Bowers' question you referred to bad loads, if in
 16 certain columns the tests showed you had bad loads you would
 17 just take it out as a field control.

18 What if the test merely showed minimum loads?

19 A (Witness Blume) What do you mean my minimum loads?

20 Q Well, I understand that you do a series of tests
 21 and you get an average, and you have a minimum and a maximum.

22 A Right. We follow the specifications, and the
 23 specifications generally provide that if more than -- I think
 24 it's 10 percent, in some jobs it may be less than that -- but
 25 let's say for the moment 10 percent.



1 If more than 10 percent of the cylinders fall
2 below the specified value, like 3000 or 5000, whatever it is,
3 that rejects the whole thing. That's why the designer has
4 to design 90 percent being stronger, and the average is
5 always stronger than the specified value.

6 Q Is that 10 percent for the particular column, or
7 10 percent for all of the material?

8 A This is usually for a particular element, but it
9 would apply to the whole job. You couldn't have either one
10 happening, either in one column or for the whole job. And
11 this is a matter of job control. It's pretty well set
12 forth in the ASTM standards and ACI standards.

13 Q Did you examine the sensitivity by columns?

14 A I didn't. I know they had excellent field control
15 out there. I personally was not the field inspector.

16 (Laughter.)

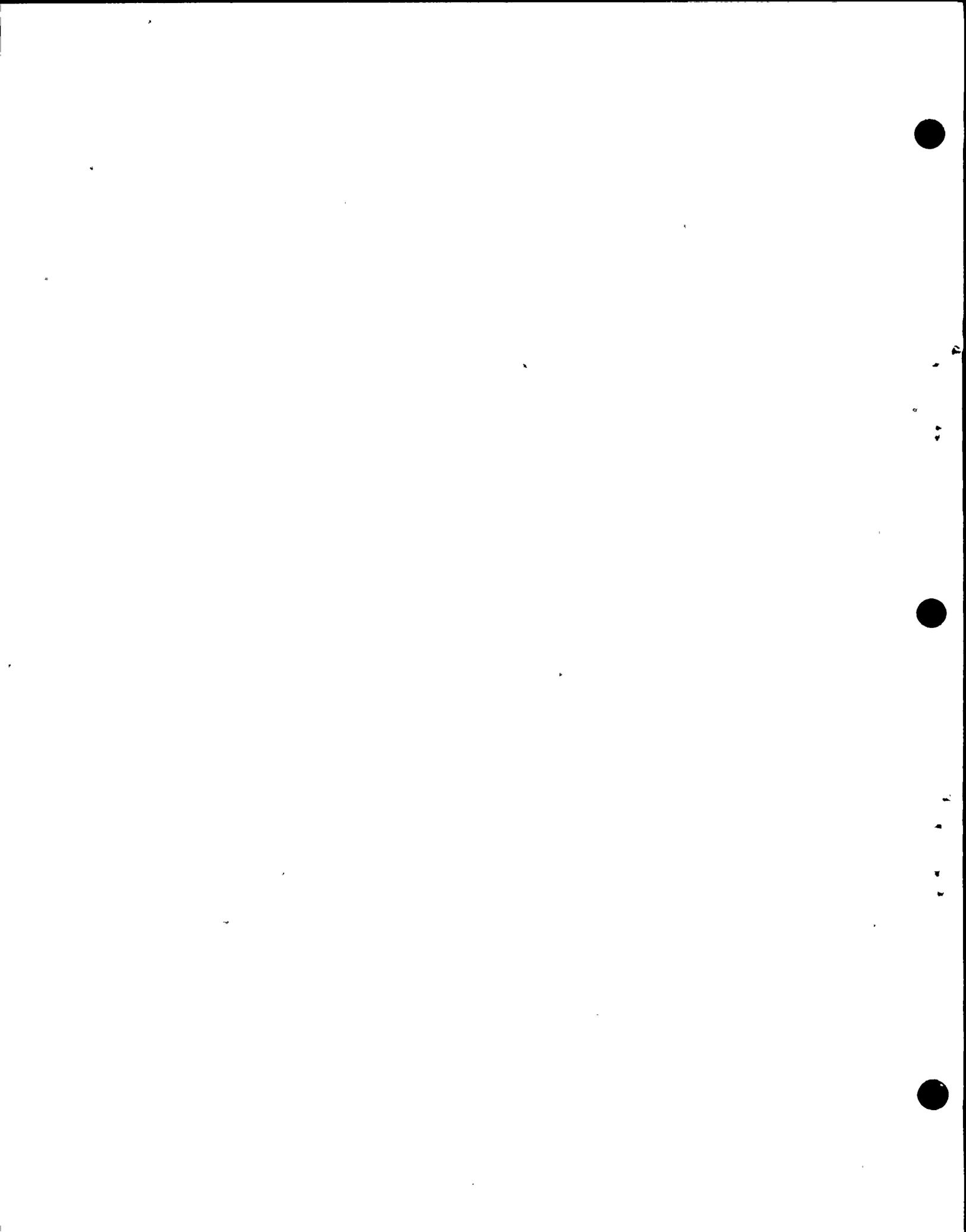
17 A (Witness Williams) That would be for each batch
18 of mix.

19 Q Did anyone examine the average per column?

20 A (Witness Blume) We're dealing here with shear
21 walls, not with columns.

22 Q But you referred to columns.

23 A I was referring to, in general, in the generic
24 manner, to the outside wall. Most concrete rejections occur
25 in buildings which have columns and beams, because they pour



1 all day, and if they find the columns are bad or the beams
2 are bad, out they come. And it's a horribly expensive
3 process.

4 Q Are there columns in the intake structure in the
5 turbine pedestal?

6 A The turbine pedestal, I wouldn't call them
7 columns. They're so massive. I would call them monoliths.
8 They're on the order of 10, 12, 14, 16 feet across, and I
9 wouldn't call those columns. They're piers.

10 Q And were averages done for those particular --
11 whatever you want to call them?

12 A I'm sure there were. As I say, I didn't
13 personally do it, but I know they followed closely the
14 normal procedures, and they're good procedures.

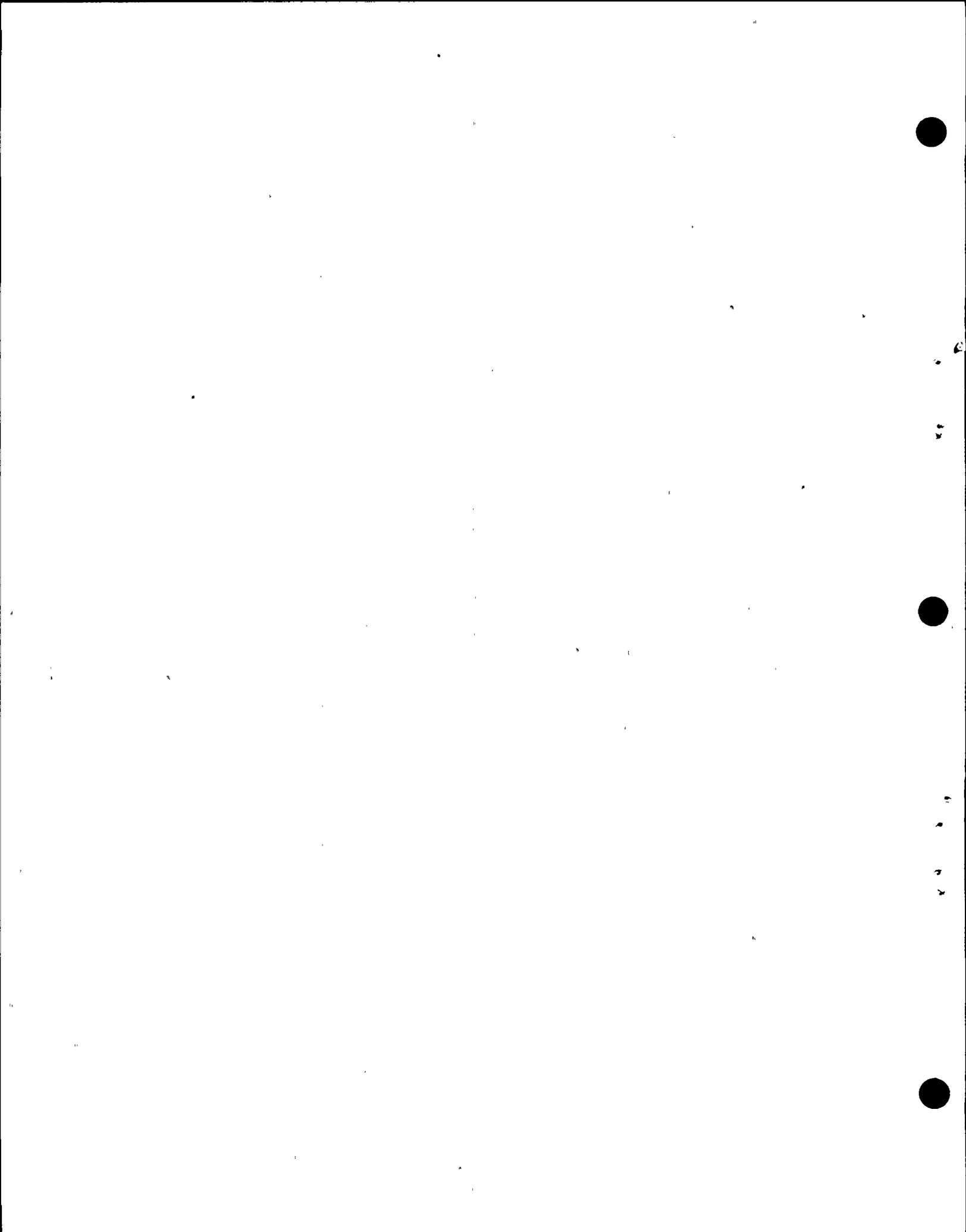
15 Q Mr. Ghio, perhaps you could answer. When they
16 calculated the average, was it on a column-by-column basis?

17 A (Witness Ghio) We're talking about the turbine
18 pedestal piers?

19 Q Yes.

20 A We had three types of tests that we cited as
21 being utilized to form the average value that we used in
22 the analysis. One of those tests represented cores from the
23 individual piers.

24 MR. NORTON: Mr. Li -- I'm looking, but I don't
25 see him here --- was on that panel, and he specifically



wel 6

1 testified that they did -- I specifically recall his
2 testimony -- that they did do that.

3 MR. KRISTOVICH: I don't specifically recall that.

4 MR. NORTON: Well, read the transcript.

5 MR. KRISTOVICH: Point it out in the transcript to
6 me.

7 MR. NORTON: I will as soon as I get it at 9:00
8 o'clock tonight.

9 MRS. BOWERS: You asked a number of questions,
10 when he described the three methods.

11 WITNESS LANG: The Schmidt hammer test was also
12 on a pier-by-pier basis.

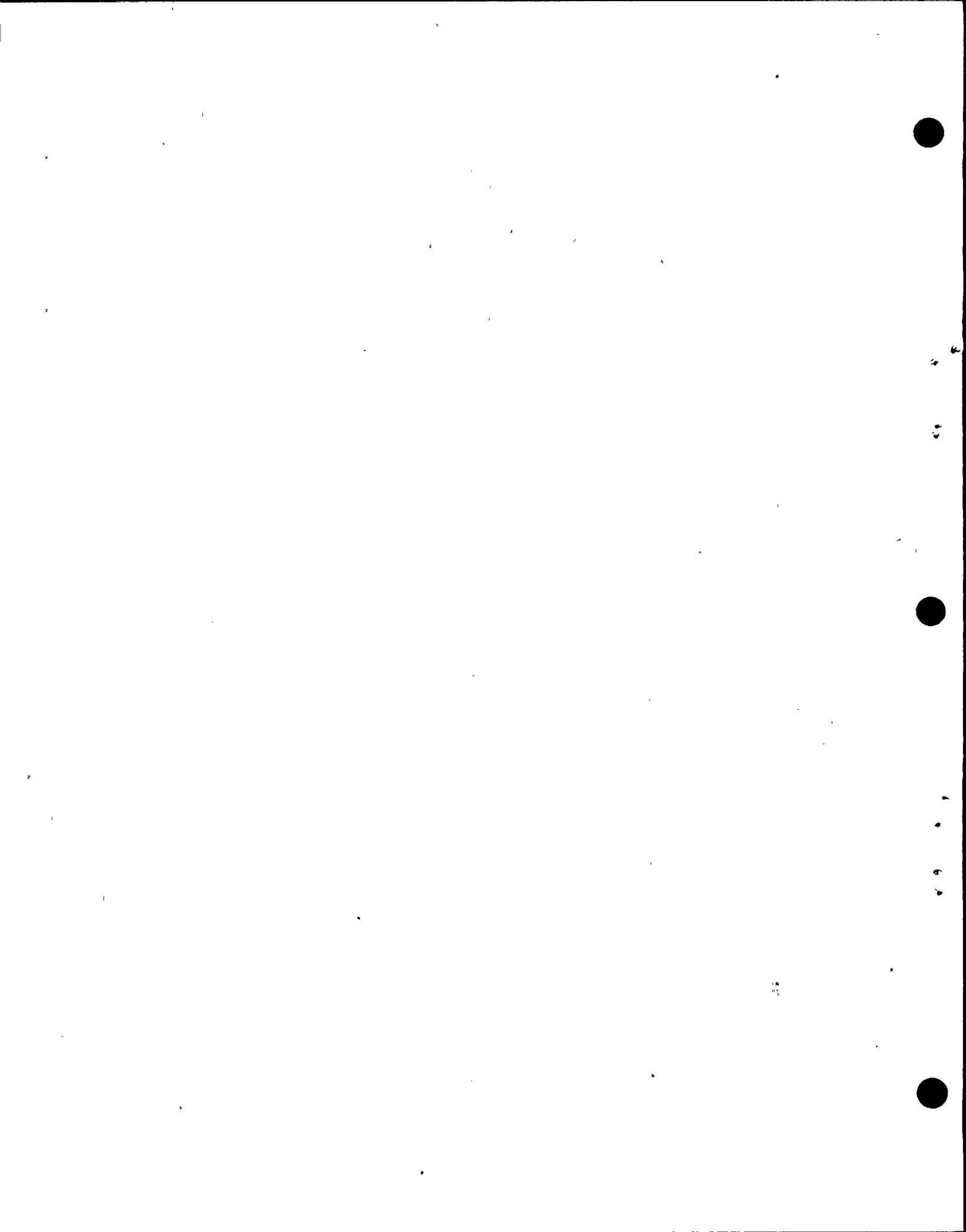
13 MR. NORTON: Yes, it was the Schmidt hammer--
14 remember, you couldn't understand him, you thought it was
15 "cement hammer?" Does that refresh your recollection about
16 his describing the tests on those piers?

17 MR. KRISTOVICH: I recall the questions. I'm
18 asking a specific question now, and I'm trying to get the
19 answer to it.

20 MR. NORTON: That was the question you asked of
21 him, and that was the answer. That was the answer to your
22 question.

23 BY MR. KRISTOVICH:

24 Q Well, Mr. Ghio, for the intake structure piers,
25 then, was this done on a pier-by-pier basis?



wel 7

1 A (Witness Ghio) No, it was not in the case of the
2 intake structure piers.

3 A (Witness Lang) As I described earlier, the
4 strength of that pier is relatively insensitive to the
5 concrete strength. If it had used a value of the specified
6 minimum rather than the average, then the strength of that
7 pier would probably drop only two percent.

8 Q Was the steel analyzed on a pier-by-pier basis
9 for the intake structure?

10 A (Witness Ghio) Was the steel? Is that what you
11 asked? Reinforcing steel?

12 Q Yes.

13 A No, it wasn't.

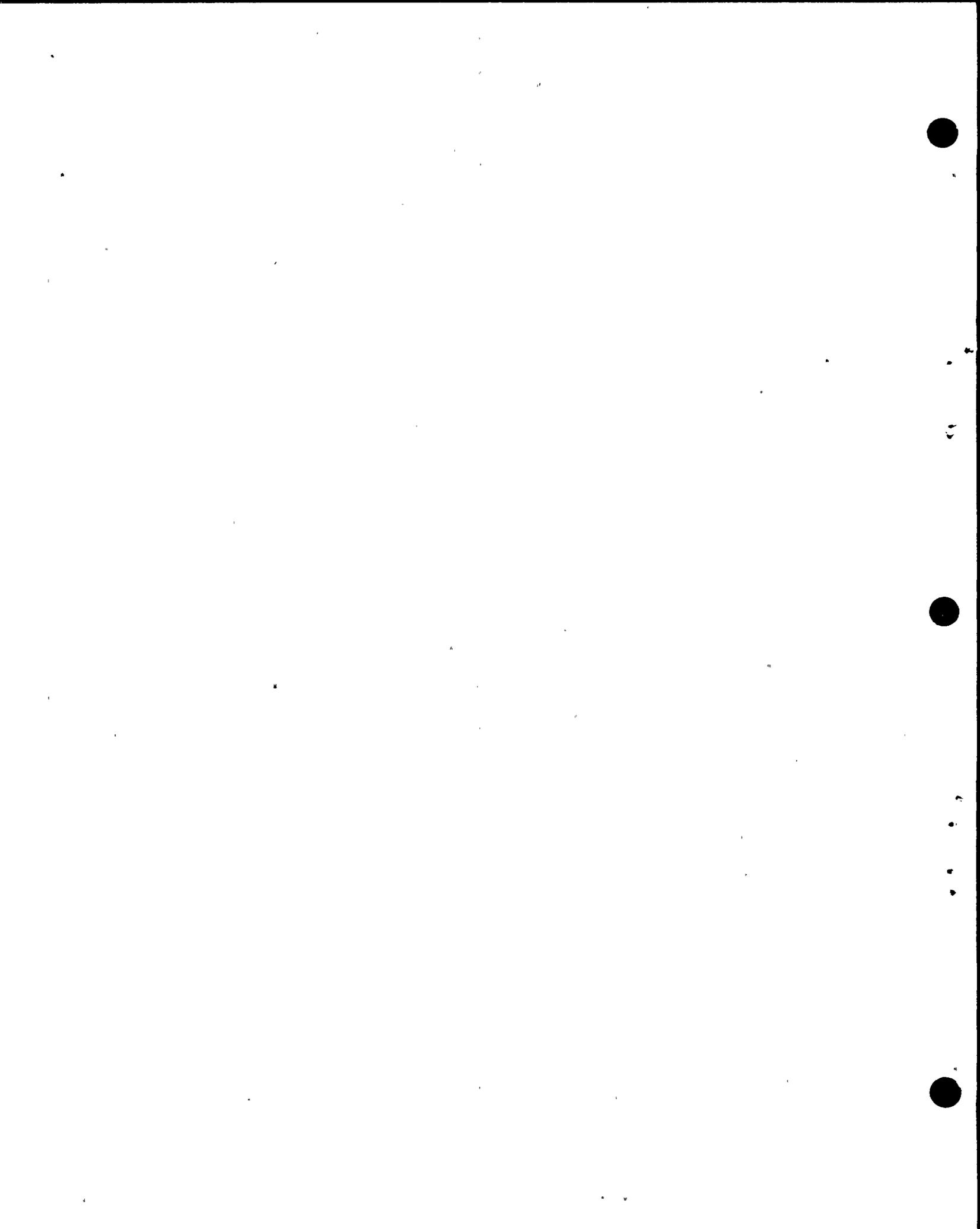
14 Q Mr. Lang, it is more sensitive to steel values,
15 isn't it?

16 A (Witness Lang) That's correct. In any given
17 pier there are a large number of bars. I don't know what
18 the probability is that every bar in that pier would be the
19 low value, but it's probably extremely low probability.

20 Q Have you studied the actual distribution of the
21 strength of the steel in the piers?

22 A No. I'm not even sure that's available.

23 Q Mr. Lang, what is the ratio of the mass of water
24 to the mass of the structure? I'm following up one of Dr.
25 Martin's questions.



1 A I don't have that number with me right now.

2 Q Is the mass of water 10 percent of the mass of
3 the structure?

4 A It's such a complex structure it would be really
5 difficult for me to estimate that right now.

6 MR. KRISTOVICH: No further questions.

7 MRS. BOWERS: Mr. Ketchen?

8 MR. KETCHEN: No questions, Mrs. Bowers.

9 MRS. BOWERS: The Board has no further questions
10 of this panel.

11 MR. NORTON: I believe our next panel is Outdoor
12 Tanks.

13 Mrs. Bowers, this panel will consist of Mr. Ghio,
14 and Mr. Jhaveri comes back, Mr. Rocha of PG&E, who was
15 previously sworn, and Mr. Yokoyama comes back.

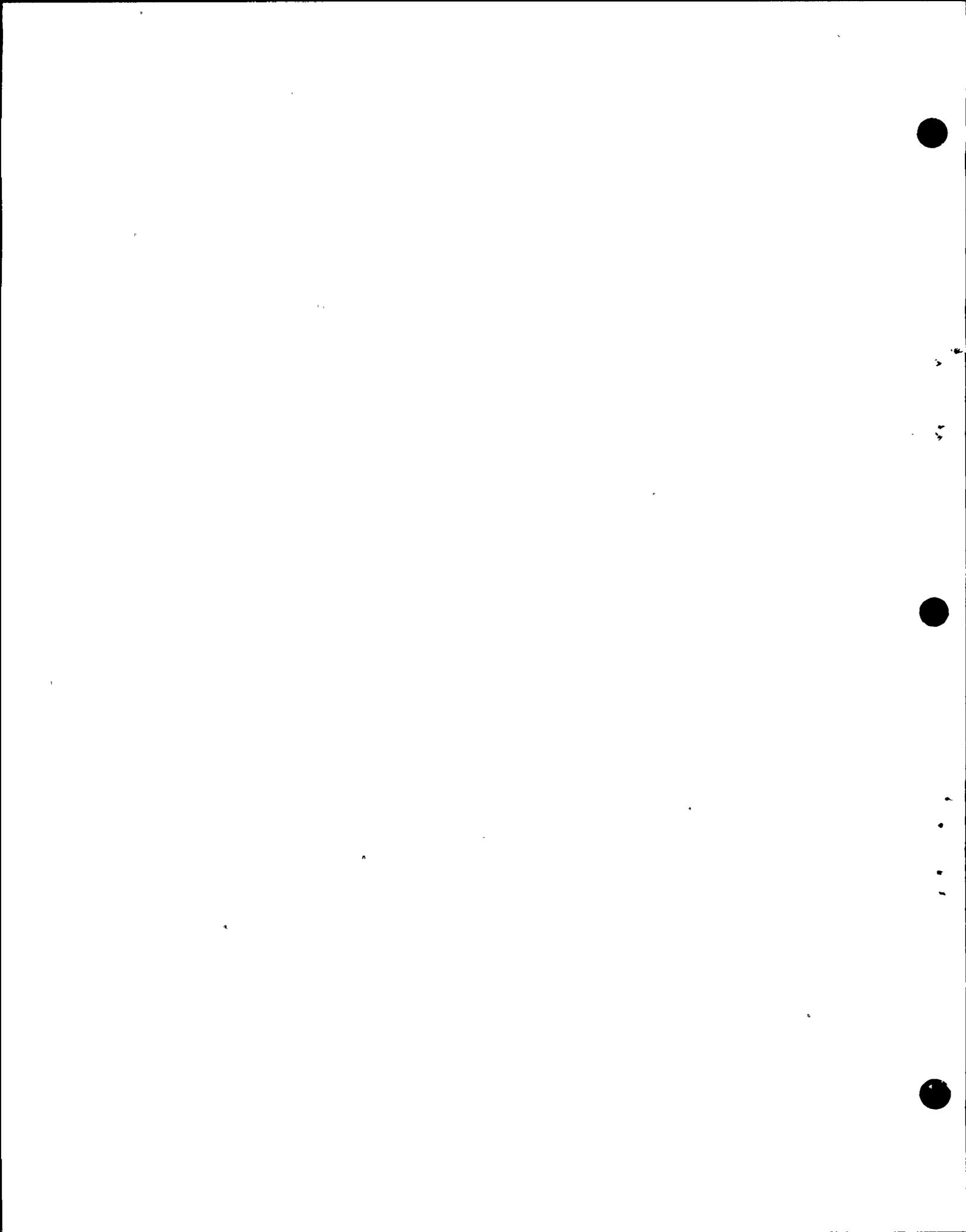
16 Mrs. Bowers, at this time, before we get started
17 on this panel, I have a couple of minor things:

18 One, Mr. Hanusiak, Mr. Sokoloff and Mr. Williams
19 are finished with those panels, and Mr. Malik. They would
20 like to be excused and leave. They were on panels yesterday.
21 Mr. Williams, of course, was just on this past panel.

22 MRS. BOWERS: Mr. Kristovich?

23 MR. KRISTOVICH: No objection.

24 MRS. BOWERS: Mr. Ketchen, Mr. Norton asked that
25 the four witnesses whom he doesn't intend to recall be



1 excused.

2 MR. KETCHUM: I have no problem with that.

3 MRS. BOWERS: All right. Then those witnesses
4 are excused.

5 MR. NORTON: Thank you.

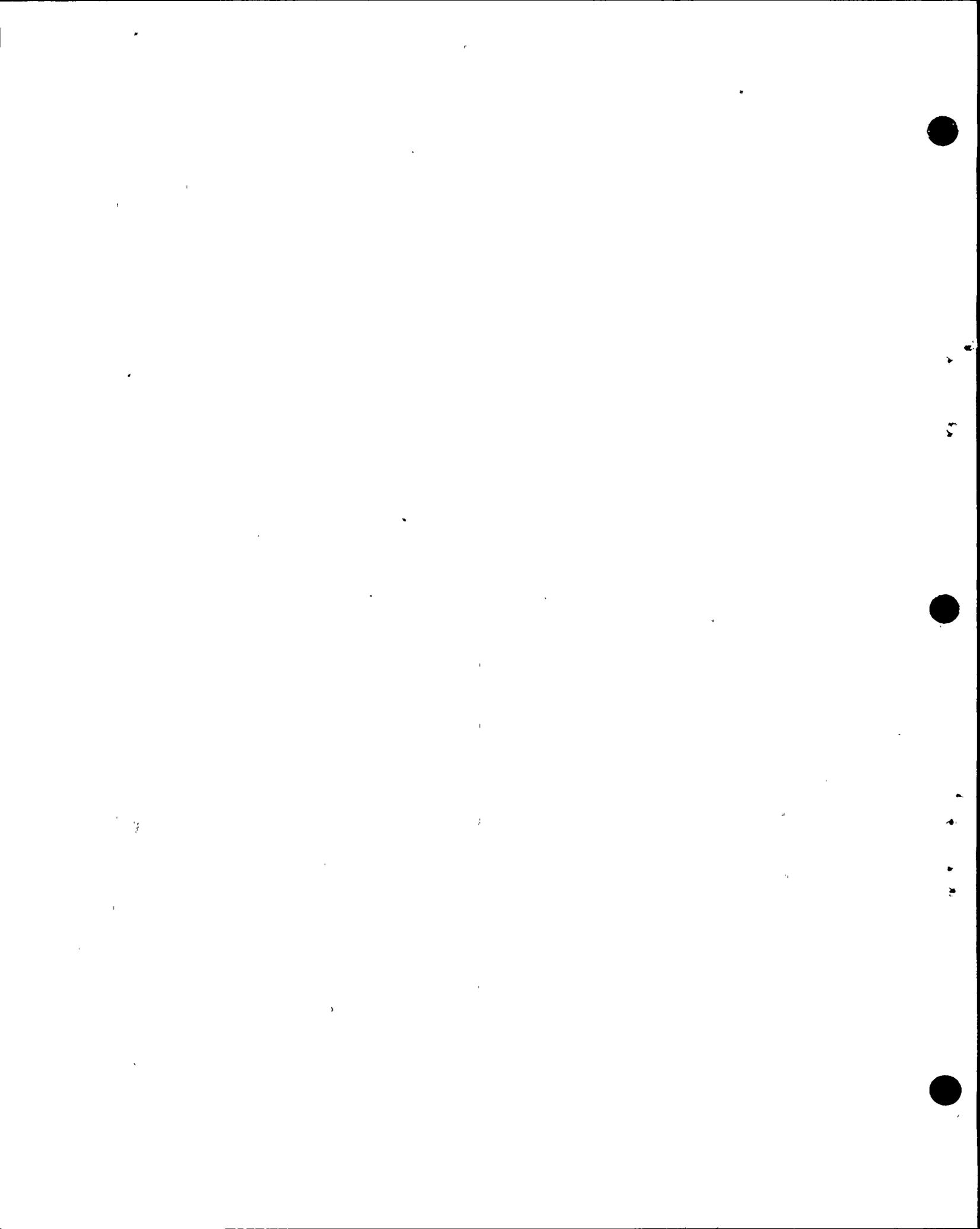
6 One other thing I thought I might ask, Mrs. Bowers,
7 is we have the witnesses reviewing the transcript each night,
8 witnesses that were on the stand that day, and there have
9 been a number of corrections to the transcript, ones that
10 are, you know, difficult words that the court reporter
11 didn't understand, or the typist didn't understand, but
12 somehow got it wrong, and so on.

13 I was going to ask what procedure you wanted to
14 use for submitting the corrections to the transcript,
15 because we are making a daily compilation of them.

16 MRS. BOWERS: As you know, the normal procedure
17 is to wait until you submit proposed findings of fact. But
18 also a normal procedure is for a party to bring up the
19 following day some error in the transcript that has
20 significance.

21 So I find it's a matter of if you don't feel that
22 there is real significance, then I would suggest letting it
23 go. But if you feel that --

24 MR. NORTON: Well, we do have somewhat of a
25 problem. The number of witnesses -- you know, we used a



wel 10

1 panel for each one of those, and the members of the panels,
2 particularly the first several weeks, would have to review
3 the transcript and we'd have that many transcripts.

4 So it would be very difficult to do on a day-by-
5 day, almost impossible to do. Because we always read the
6 transcripts between 9:00 and 10:00 at night, so it's almost
7 impossible to do on a day-by-day basis.

8 But I thought perhaps at the end of the case,
9 maybe before rebuttal or at some point in time like that,
10 corrections could be made that might be interpreted as
11 significant. You know, one person might think it was
12 significant, and another might not.

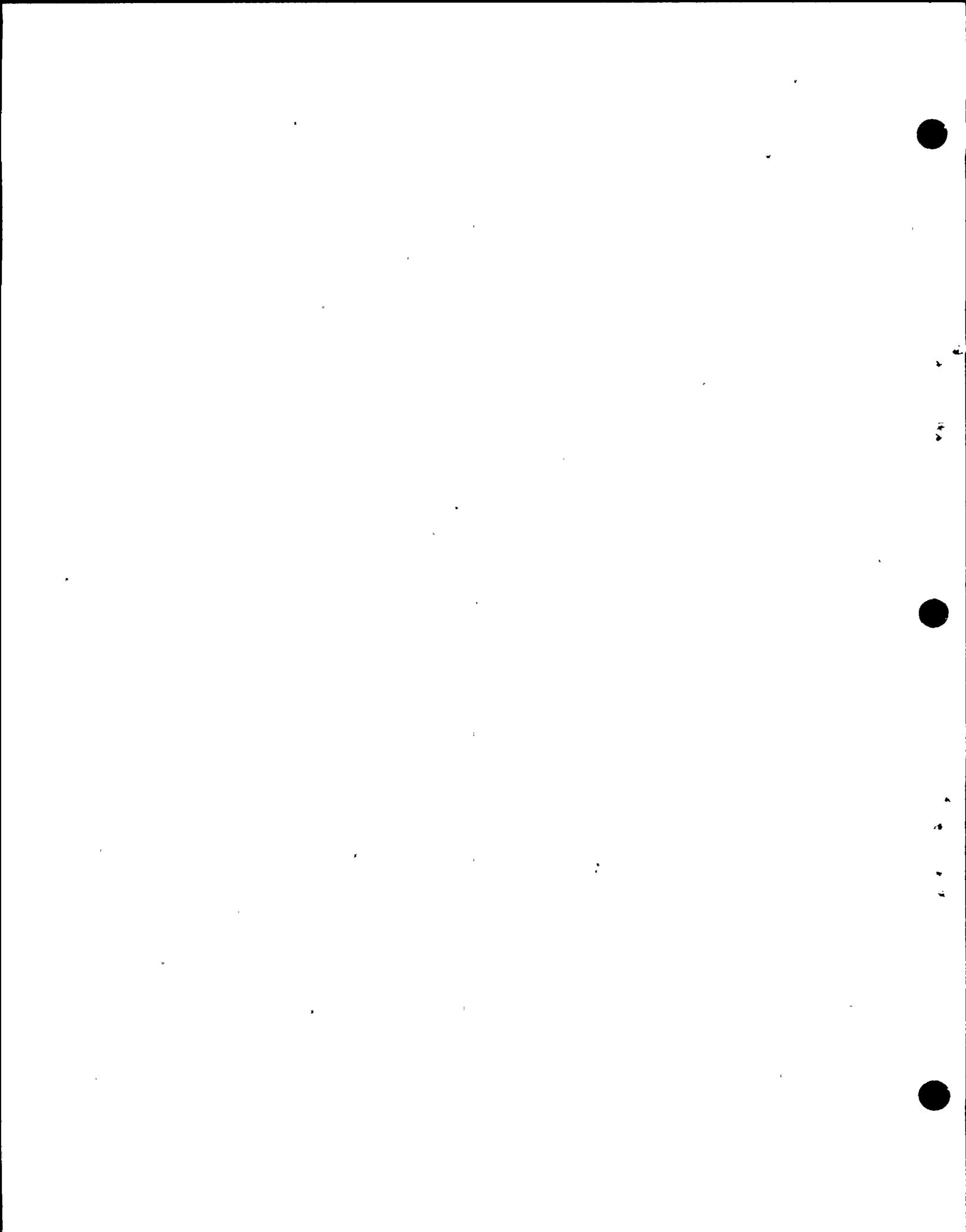
13 MRS. BOWERS: Let me say they could be submitted
14 at any time.

15 MR. NORTON: All right.

16 Now, the final thing I wanted to discuss was
17 scheduling.

18 I'm not sure -- I understood we were going to go
19 Saturday, but I wanted to check and make sure on that.

20 MRS. BOWERS: This is something that the Board
21 intended to raise today. Yesterday Mr. Hubbard, with tears
22 in his eyes, raised the question about Saturdays, and we
23 had an opportunity to discuss it further, prompted by that
24 inquiry, and we intend to go both Saturdays, the 6th and the
25 13th.



1 MR. NORTON: All right. That brings me into my
2 question of, it appears as if we will finish our case I
3 would say no later than tomorrow, at this pace. I see
4 Intervenor's counsel shaking his head "Yes."

5 I would expect we would finish. So that would
6 mean on Saturday that Intervenor's would begin to put on their
7 case, and that's what I wanted to know, is who they were
8 going to put on so we can prepare for cross-examination.

9 MR. KRISTOVICH: I understand that Dr. Brune is
10 not available from the 4th through the 8th, so it would be
11 Mr. Hubbard.

12 MR. NORTON: All right. Mr. Hubbard will be on
13 on Saturday, and then you'd have no one for Monday?

14 MR. KRISTOVICH: Monday is the 8th, and Dr. Brune
15 is not available until Tuesday.

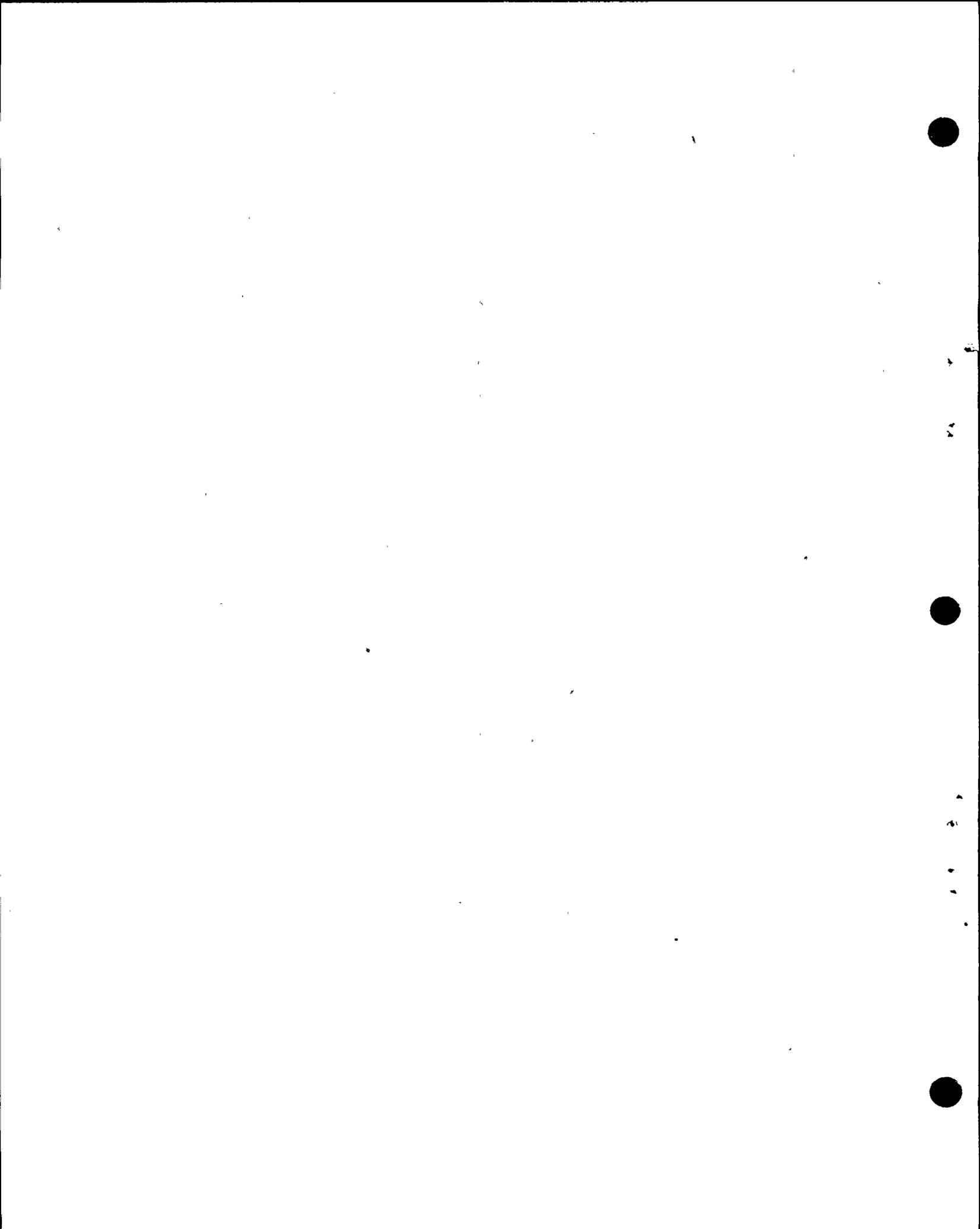
16 MR. NORTON: All right. So we can prepare our
17 cross-examination of their witnesses, that gives us some idea.

18 MRS. BOWERS: Well, but we don't know how long
19 Mr. Hubbard will be on the stand.

20 MR. NORTON: That's right.

21 MRS. BOWERS: And if it so happens that Mr. Hubbard
22 is not on the stand through Monday afternoon, does the Staff
23 have -- I mean what do the parties suggest?

24 MR. NORTON: There's a possibility that Mr.
25 Hubbard might be off the stand Saturday morning, also, which



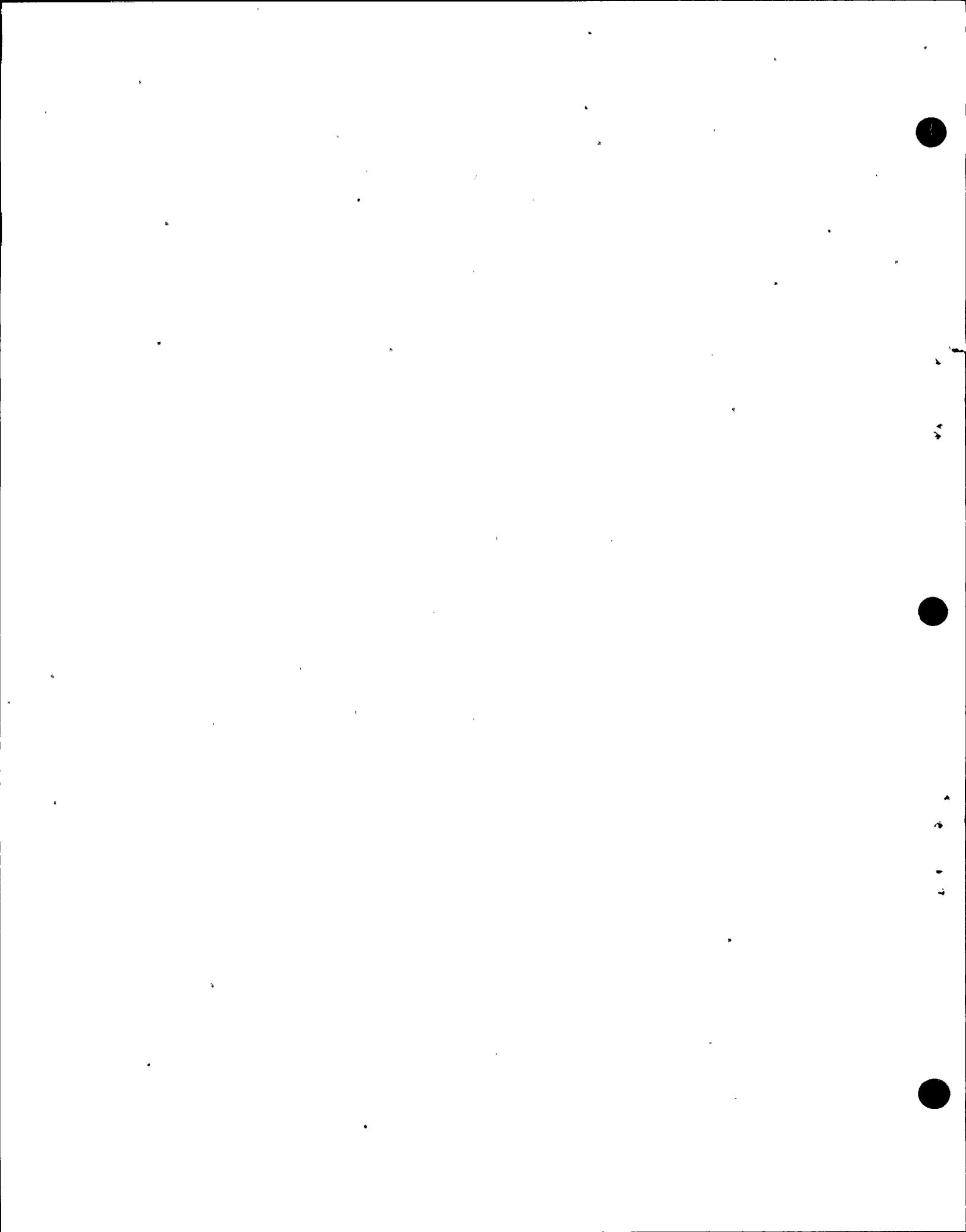
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is the same problem.

MRS. BOWERS: Mr. Ketchen, do you know if the Staff would be prepared to proceed with the understanding that Dr. Brune would be taken out of turn?

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1 MR. KETCHEN: Well, I would-- I would like to
2 have the Fifth on that one. I think I would like some dis-
3 cussion to see exactly what witnesses are going to be here
4 when.

5 But my initial reaction to the question is that
6 we will be prepared to start out with our direct case on the
7 8th. So I would like to double-check that with co-Counsel,
8 but I think we'll be ready to go whenever we finish this up.

9 MRS. BOWERS: Well, but I thought you said Dr.
10 Brune would not be available until after the 8th, is that
11 right?

12 MR. KRISTOVICH: That's my understanding. Mr.
13 Fleischaker will be here this afternoon and I think he's
14 been in touch with Dr. Brune and he may have more specific
15 information.

16 MR. NORTON: I believe we discussed among
17 Counsel, with Mr. Tourtellotte and Mr. Fleischaker and my-
18 self, that Dr. Brune would not be available until after the
19 8th. And frankly, if he were on Saturday I would need some
20 time to prepare cross-examination.

21 MR. KRISTOVICH: I'm pretty sure that that is
22 accurate, that he isn't available.

23 MR. NORTON: There's nothing we can do about it,
24 so that's the way it's going to be. But I'd like to be sure
25 that Mr. Hubbard is going to be here Saturday because I



mpb2

1 understood he wasn't going to be here Saturday.

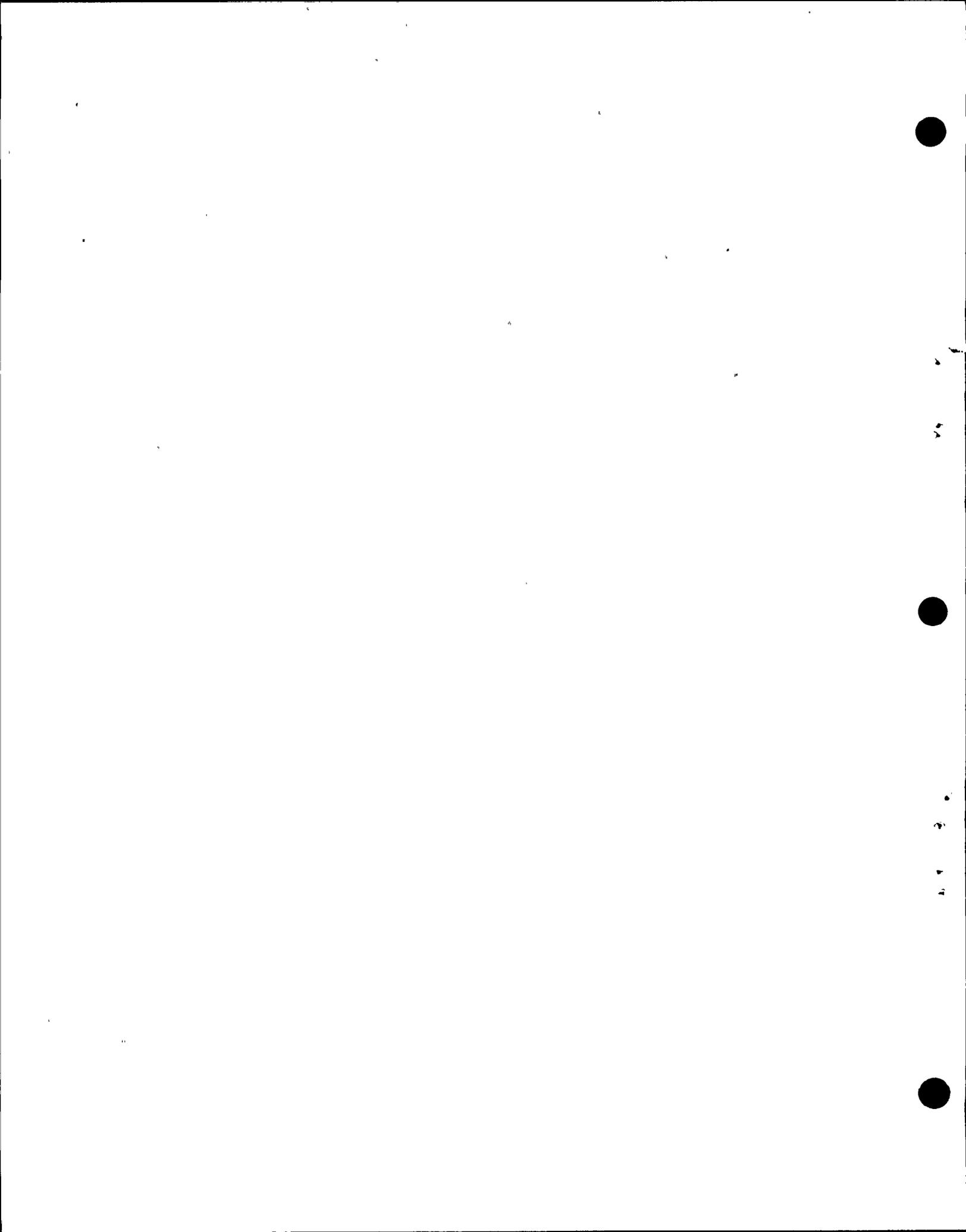
2 MRS. BOWERS: Well, Mr. Ketchen, we're kind of
3 back to where we were. And I realize you might want to consid-
4 er this over the luncheon break. But the question is if the
5 Intervenor's available witnesses, and right now Mr. Hubbard,
6 if his testimony concludes prior to the close of business
7 Monday, would the Staff be able to go out of town and put on
8 witnesses?

9 MR. KETCHEN: Our planning, as I understand it,
10 is to be prepared to go forward Monday. We were scheduling
11 for Monday.

12 MRS. BOWERS: Well, what about Saturday?

13 MR. KETCHEN: Saturday night create a problem,
14 if we finished early on Saturday. Our witnesses are scheduled
15 to -- as I understand our schedule, we would start out with
16 the geologists, and they are scheduled to be here ready to go
17 Monday morning first thing.

18 MR. NORTON: Mrs. Bowers, if we finished early
19 on Saturday it would not be lost time for the parties because
20 we have been busy preparing our direct case and we have some
21 preparation to do for cross-examination of Dr. Brune and Staff
22 witnesses too. So it wouldn't be lost time as far as we're
23 concerned. For example, if we finished Saturday at two o'clock
24 or something like that it wouldn't be lost time for us. We
25 would be able to use that time.



mpb: 3 1

MR. KRISTOVICH: Mrs. Bowers, we would agree with
2 that.

3

As you're well aware, we have the feeling that
4 use of all day Saturday is not lost time. We could prepare
5 for cross-examination.

6

MRS. BOWERS: Well, let me get back to Mr. Ketchen
7 for a minute now.

8

Do you understand -- if I followed what's been
9 said, your witnesses would start Monday morning, assuming
10 that Mr. Hubbard's testimony is concluded. But then there
11 would be the interruption when Dr. Brune is here Tuesday?

12

MR. KRISTOVICH: I believe Tuesday. All I know
13 is he will be available after the 8th. On which specific day,
14 I would have to talk to Mr. Fleischaker. We would attempt to
15 have him here Tuesday.

16

MRS. BOWERS: Which could well be the interrup-
17 tion of the Staff's case.

18

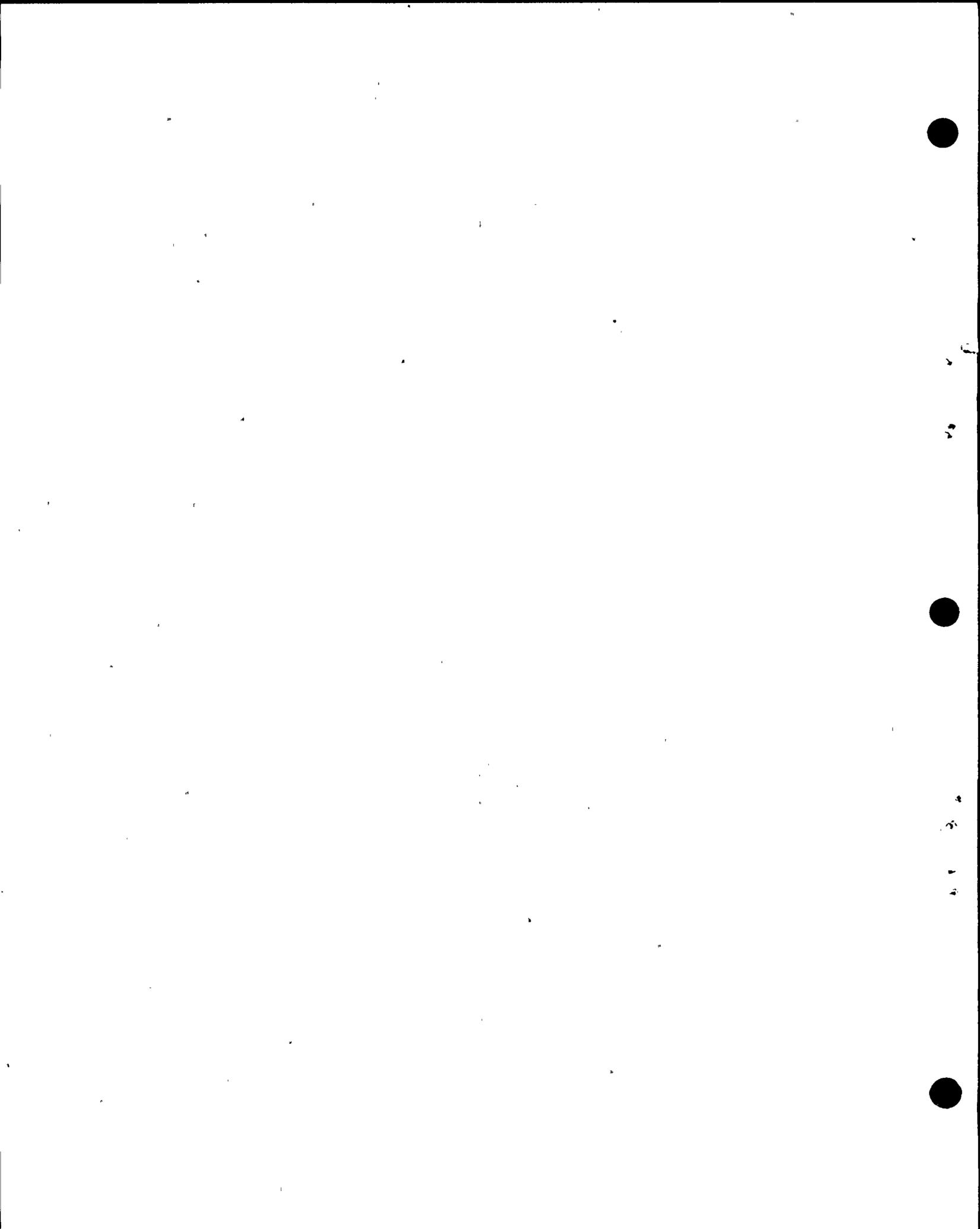
MR. KRISTOVICH: Well, whatever is available to
19 the other attorneys.

20

MR. NORTON: I would rather have Dr. Brune come
21 at some point in time where it isn't an interruption in the
22 middle of another panel or witnesses, at some natural break
23 in the Staff's case.

24

I don't think it's fair to the Staff to have a
25 witness on the stand, and then have someone come in, then put



mpbA

1 him back on again.

2 MR. KETCHEN: Well, I'm not sure, Mrs. Bowers,
3 we're talking about that kind of an interruption.

4 I assumed that you meant interruption in the
5 direct case as a whole, if that can be accommodated. I just
6 think if you're asking the Staff, Mrs. Bowers, I don't think
7 we have that much problem in scheduling and being prepared to
8 continue in a logical way with the hearing. I just don't
9 think we're going to have a break or any loss of time other
10 than Saturday, if we finish early.

11 So I don't think we have a problem with the
12 Staff's scheduling of witnesses.

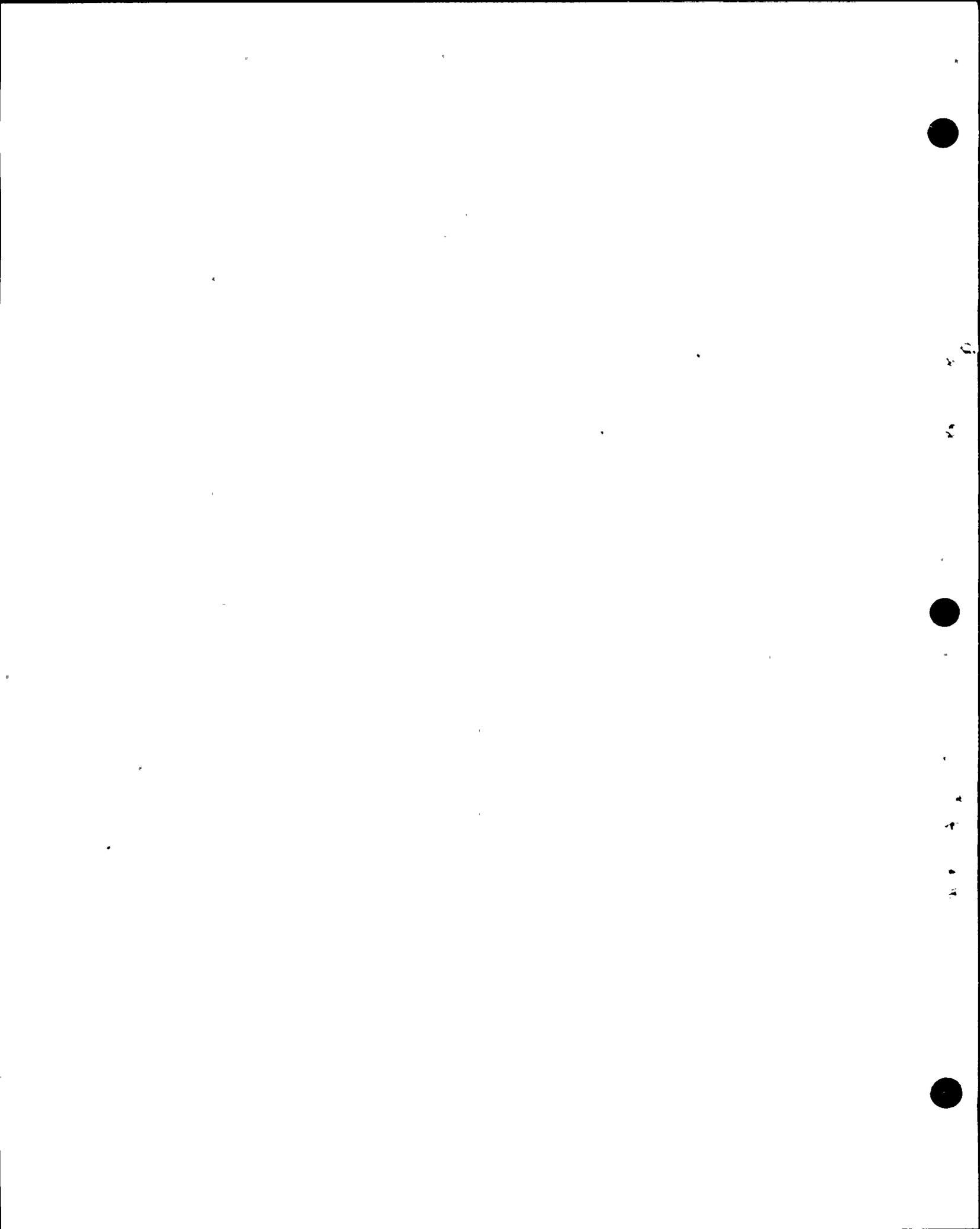
13 MRS. BOWERS: Okay.

14 I just wanted to make sure that there was full
15 communication because I thought that you intended to have
16 Dr. Brune here Tuesday morning to proceed, and that could
17 well run into interruption of the Staff's witnesses. And
18 that is not appropriate.

19 MR. KRISTOVICH: I guess I'm a little unclear,
20 then, when the Board and the other parties would want Dr. Brune
21 to be here.

22 MR. NORTON: I think we can probably much easier
23 decide that on Saturday when we've gotten to that point, and
24 see where we are.

25 MRS. BOWERS: Fine.



mpb5

1

... MR. NORTON: All right.

2

Whereupon,

3

JOHN A. BLUME,

4

VINCENT J. GHIO,

5

DILIP P. JHAVERI,

6

OSCAR A. ROCHA,

7

and

8

RALPH T. YOKOYAMA

9

resumed the stand as witnesses on behalf of the Applicants,

10

and, having been previously duly sworn, were examined and

11

testified further as follows:

12

DIRECT EXAMINATION

13

BY MR. NORTON:

14

Q Mr. Ghio, do you have corrections to the Hosgri
Analysis and Evaluation of the Outdoor Water Storage Tanks
testimony?

15

16

A (Witness Ghio) Yes, I do.

17

On page 3, line 1, remove the underlining of the
word "pressure".

18

19

Line 12, change the word "at" to "near".

20

Q Which "at", the first one?

21

A Excuse me. The first "at".

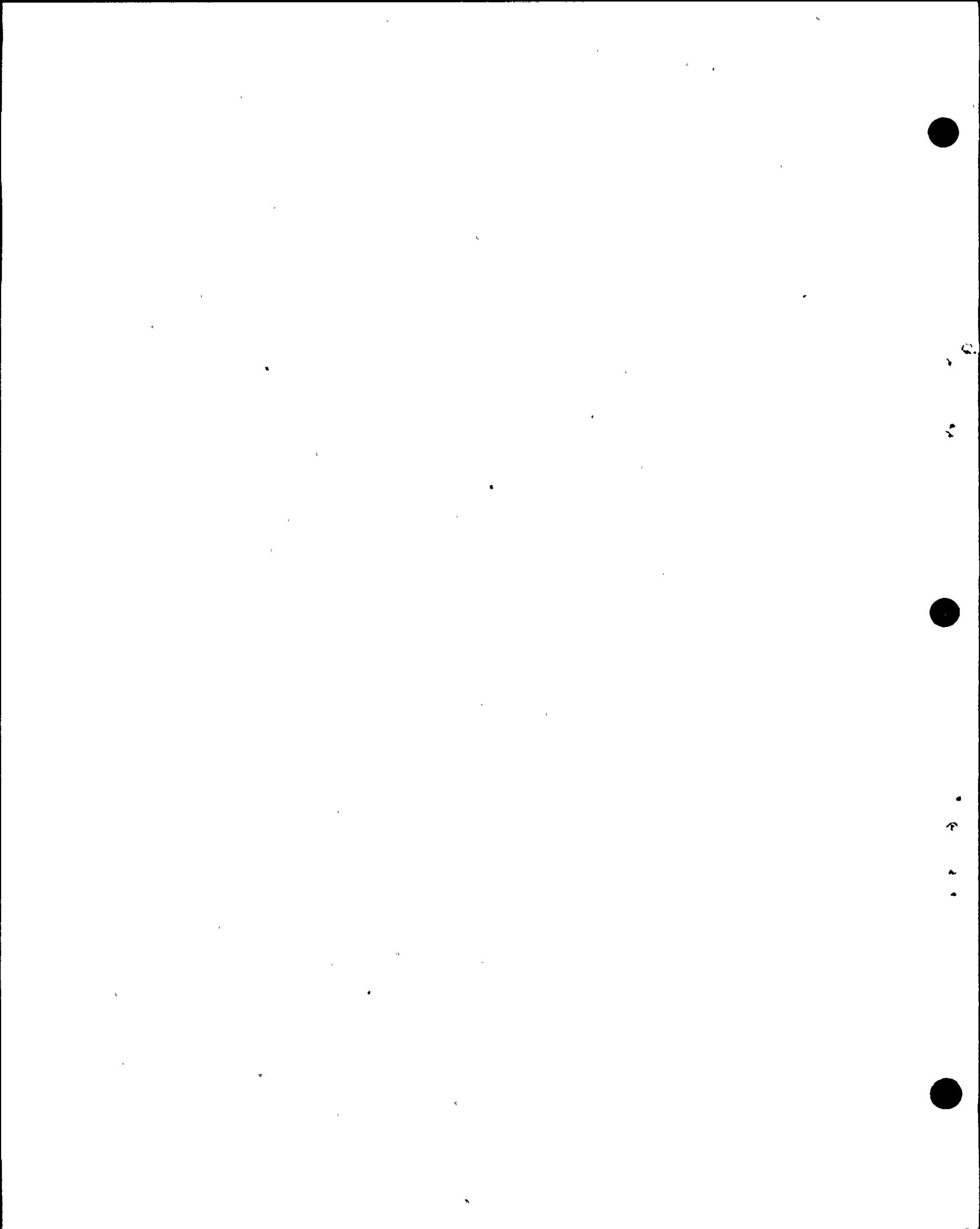
22

Insert a comma after the word "base". Remove
the word "to", t-o, the first one. Replace the words "at the
midheight to" -- that's the last "to" -- with the words

23

24

25



mpb6 1 "throughout the height, and".

2 Line 13, remove the words "the upper part includ-
3 ing".

4 MR. BRIGHT: Mr. Ghio, could I get you to read
5 through that?

6 WITNESS GHIO: Yes.

7 Would you like me to read the entire statement
8 the way it should read?

9 MR. BRIGHT: Yes, if you would.

10 WITNESS GHIO: Okay.

11 "Complete reinforced concrete encasement
12 of the original steel shell varying in thickness
13 from 36 inches near the base, 12 inches through-
14 out the height, and eight inches for the top dome."

15 MR. BRIGHT: Fine.

16 WITNESS GHIO: Okay.

17 Line 22, change the number 4 to 5.

18 Line 23, change the number 5 to 6.

19 Now there are some additional corrections
20 involving the tables that are attached to this piece of
21 testimony. There is a new table, number 5.

22 MR. NORTON: These were passed out I thought
23 when Mr. Ghio testified originally, and then we said that
24 we were going to make these corrections later. But we're
25 passing them out now again in case someone misplaced their



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mpb7

1 copy.

2 BY MR. NORTON:

3 Q You've got a new Table 5. What happened to the
4 old 5?5 A (Witness Ghio) What was the old Table 5 has been
6 renumbered Table 6.

7 Q Now what about Figure 3 that was passed out?

8 A Okay.

9 Figure 3, which precedes these tables, has been
10 revised. There is a new table that is included in that package,
11 or a new figure.12 MRS. BOWERS: What happens to Table 6? We now
13 have two Table 6s.14 MR. NORTON: No. We passed out a new Table 5 and
15 renumbered the previous Table 5 Table 6.

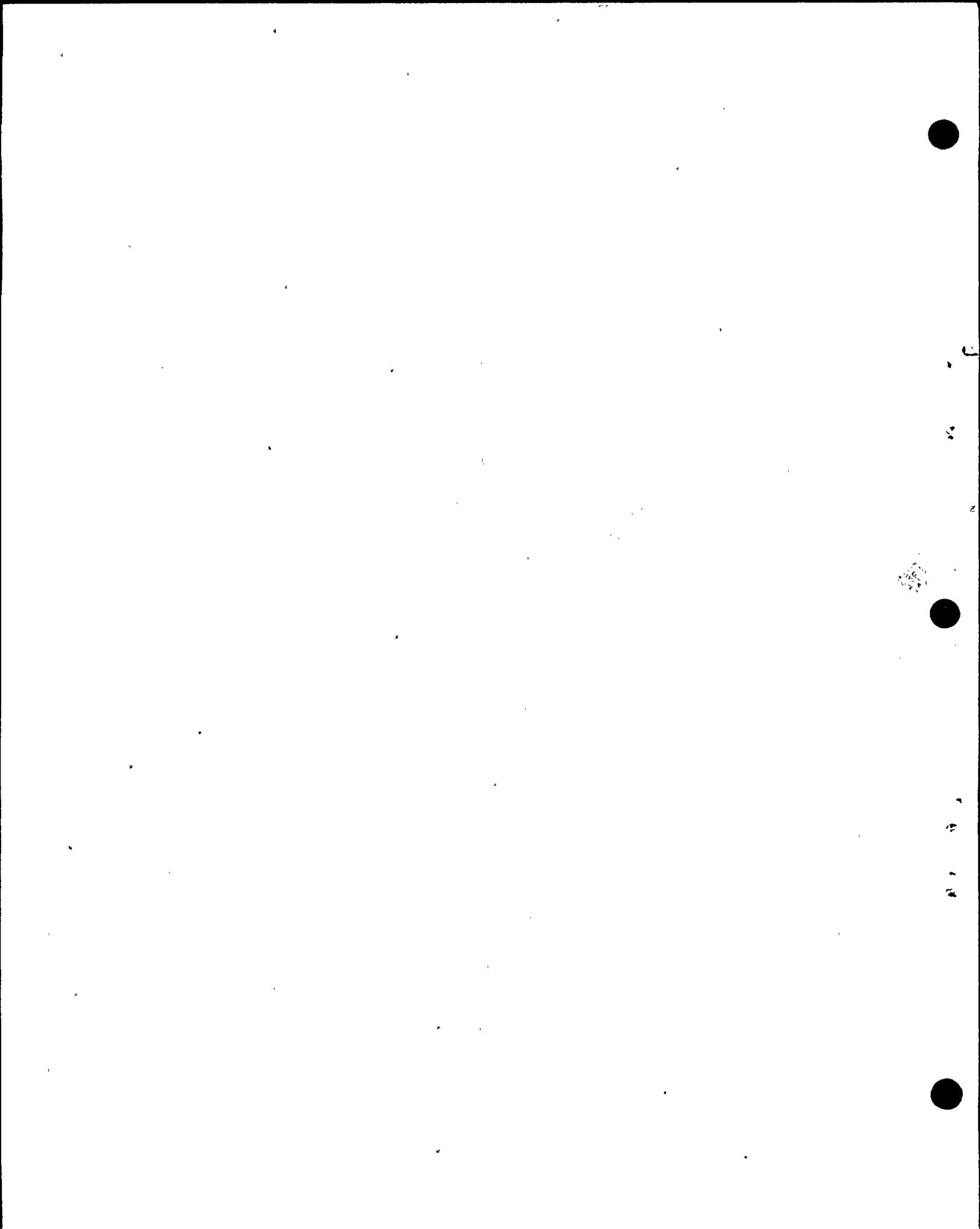
16 MRS. BOWERS: Okay.

17 MR. KRISTOVICH: I don't mean to interrupt, but
18 is this Figure 3 different from the previous Figure 3?

19 WITNESS GHIO: Yes. Figure 3 has been revised.

20 MR. KRISTOVICH: In what way?

21 WITNESS GHIO: In what way? Well, the dimensions.
22 If you look at the old figure, there are some dimensions given
23 for the thickness of some concrete encasement of these tanks
24 and those dimensions have changed, or at least one of the
25 dimensions has been eliminated.



mpb8

1 MR. NORTON: The only difference I see is if you
2 look at the upper right-hand portion of the figure, of the
3 original figure there is the eight inch demarkation, and in
4 your Figure 3 there is no eight inch demarkation.

5 BY MR. NORTON:

6 Q Is that the only change?

7 A (Witness Ghio) That's correct, that's the only
8 change.

9 MR. NORTON: Well, Mrs. Bowers, we would ask,
10 then, that everyone remove Figure 3, the original Figure 3
11 from the testimony, and insert the new Figure 3. And remove
12 the original Figure 5 from their original testimony and insert
13 the new Figures 5 and 6 -- Table 6. Excuse me. I said
14 "figure" and I meant "Tables" 5 and 6.

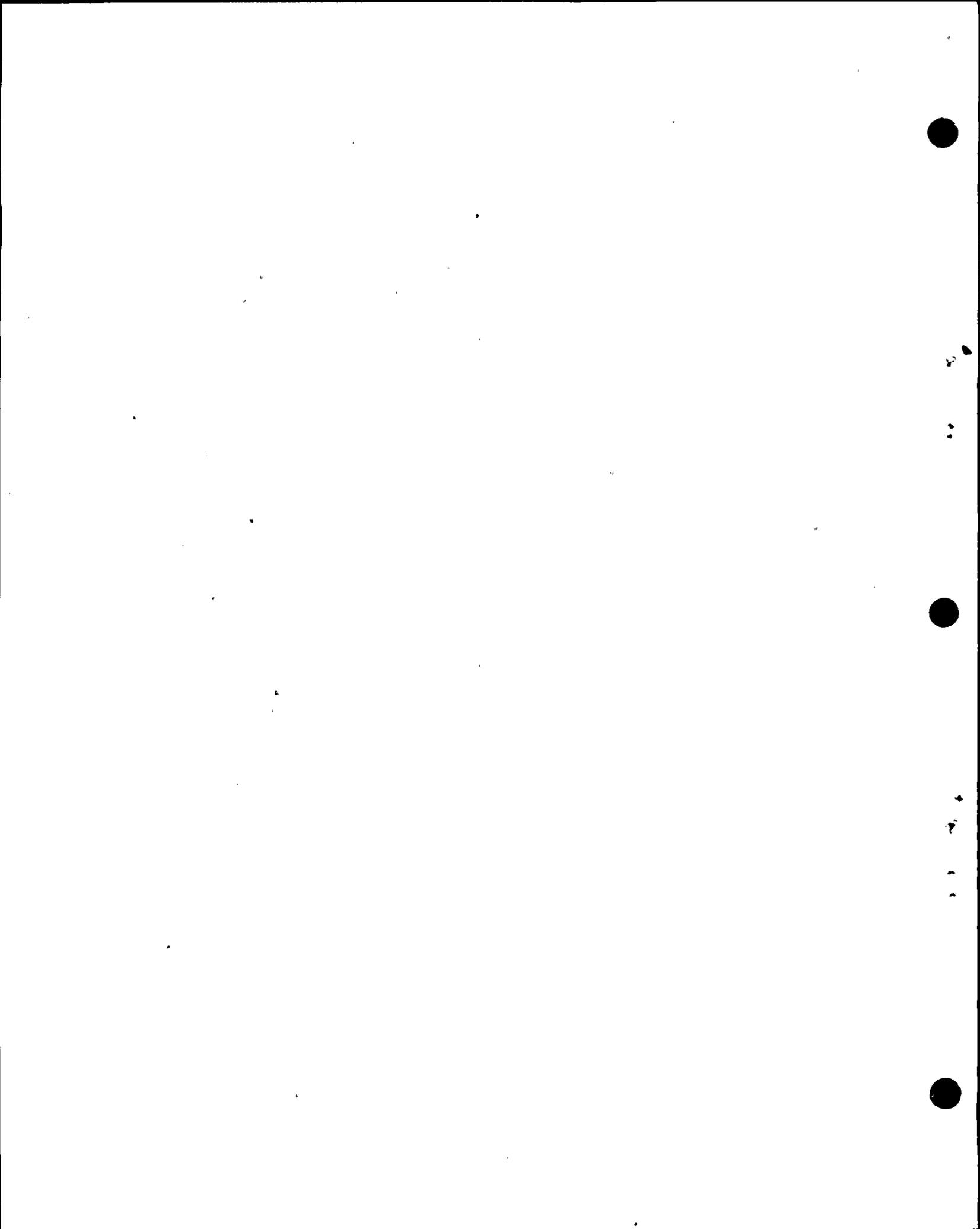
15 MRS. BOWERS: In the copies that you'll be hand-
16 ing to the Court Reporter, will those show the new -- the
17 substitutions?

18 MR. NORTON: Yes.

19 WITNESS GHIO: Excuse me, there is one additional
20 correction to be made on the newly numbered Table 6, the one
21 that you just received that was renumbered 6. It's entitled
22 Refueling Water Storage Tank Strength Comparison of Concrete
23 Elements.

24 BY MR. NORTON:

25 Q What's the change?



mpb9

1 A (Witness Ghio) The last column on the far right,
2 the very last column on the table, the first number in that
3 column is 92.18. It should be replaced by 51.6.

4 The next number in the table is 156.41, and it
5 should be replaced by 77.4. And that applies to the next two
6 entries in that column as well, that is the 156.41 is changed
7 to 77.4.

8 That is all the corrections.

9 MR. KETCHEN: Mrs. Bowers, may I interrupt?

10 I'm a little bit confused about Table 5 in the
11 original testimony which was renumbered Table 6. In the
12 original testimony is that the same as the Table 6 that was
13 in the handout?

14 MR. NORTON: Yes.

15 WITNESS GHIO: Yes, the content of the table is
16 the same. The only thing that is changed is the table number.

17 MR. KETCHEN: Thank you.

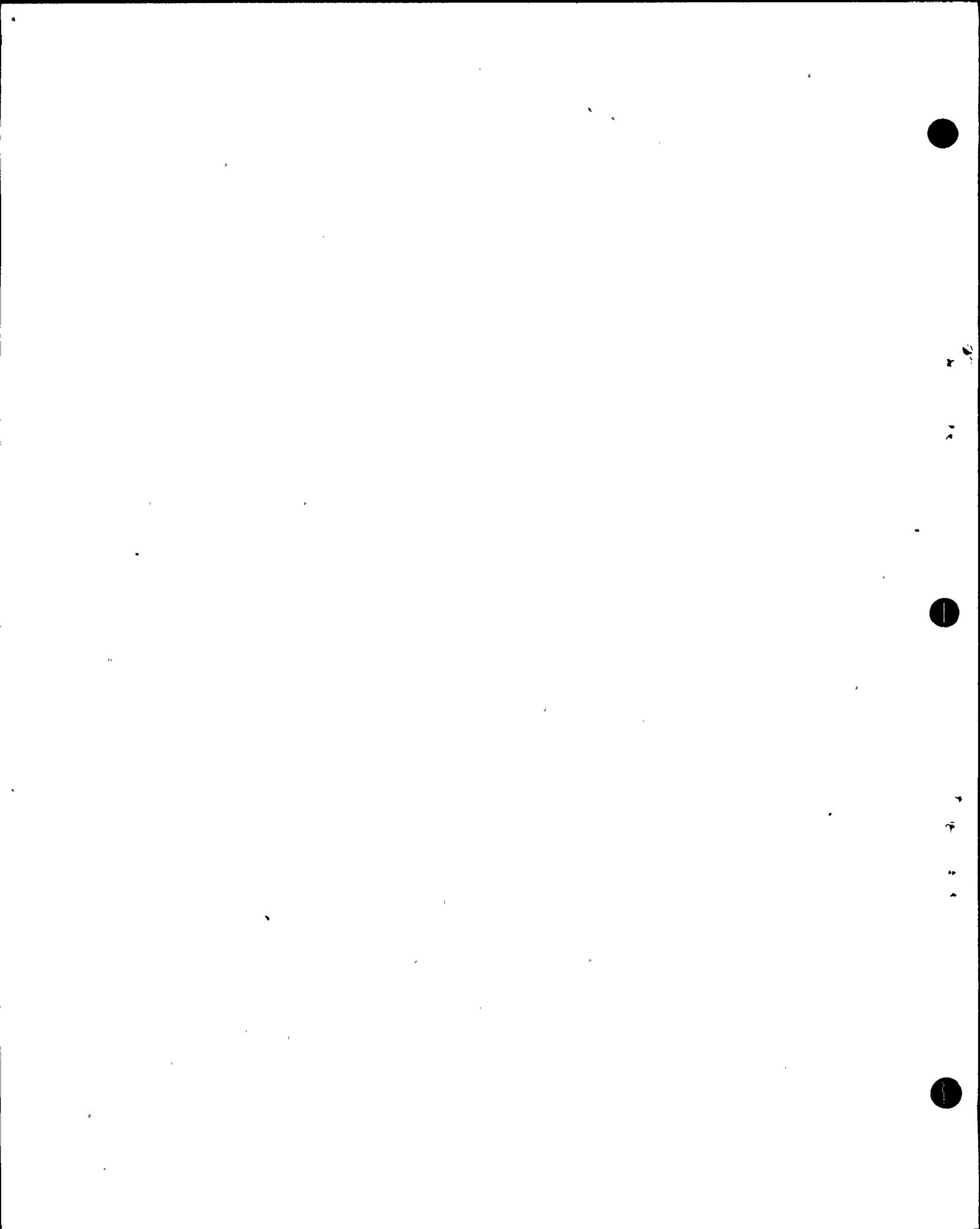
18 MRS. BOWERS: And then that last column of
19 corrections.

20 WITNESS GHIO: Yes, plus the corrections I just
21 made in the last column.

22 MR. NORTON: I'm almost afraid to ask this ques-
23 tion.

24 BY MR. NORTON:

25 Q Is the panel willing to adopt this testimony, as



mpbl0 1 corrected, as their own?

2 A (Chorus of yes.)

3 Q Mr. Ghio, would you now summarize, please?

4 A (Witness Ghio) Okay.

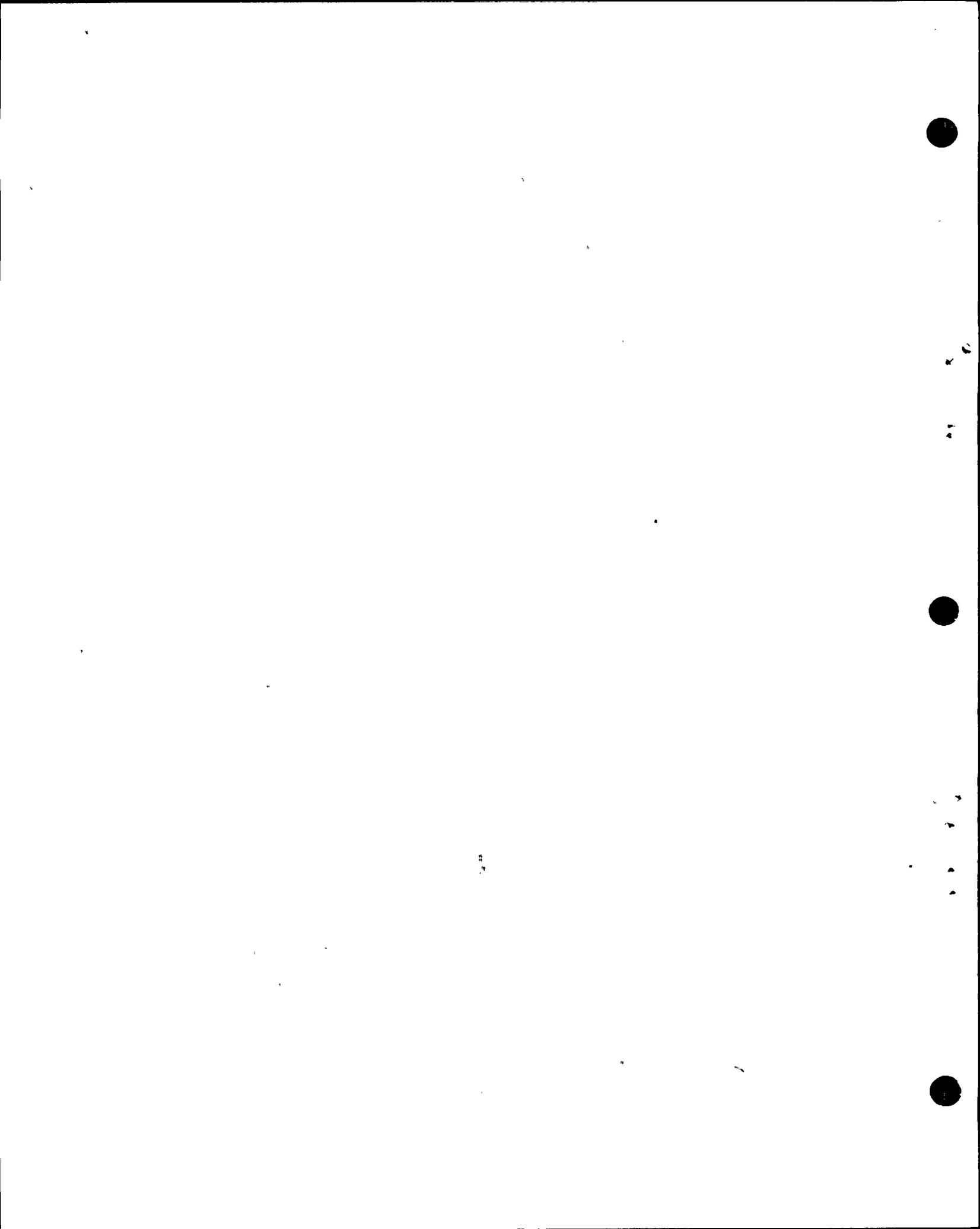
5 The outdoor tanks that are discussed in this
6 testimony consist of the refueling water storage tanks, con-
7 densate storage tanks, and a fire water and transfer storage
8 tank. The tanks are 40 feet in diameter and average 50 feet
9 in height, and were originally constructed as steel tanks
10 founded on a concrete foundation on an engineered fill.

11 These tanks were analyzed for the Newmark free-
12 field horizontal spectra, normalized to .75g, with no tau
13 adjustment. Vertical spectra were taken as two-thirds of the
14 horizontal spectra. Damping was taken as seven percent for
15 concrete and four percent for steel.

16 The effect of interaction between the tank and
17 the contained fluid was considered in the analysis. The
18 structure was analyzed for dead load and hydrostatic load in
19 addition to the earthquake loads.

20 Three components of earthquake forces were com-
21 bined by the square root sum of the squares procedure. The
22 analysis was made with the assumption of axisymmetry in the
23 structure using a finite element model.

24 The testimony goes on to discuss the models in
25 some detail, And then indicates that there were modifications,



mpbl1 1 fairly substantial in nature, required for these tanks. These
2 modifications were due to the higher seismic input and the
3 use of current methodology for the analysis.

4 The modifications consist of a complete reinforced
5 concrete encasement of the original steel tanks, the addition
6 of a reinforced concrete foundation ring surrounding the exist-
7 ing foundation, the complete removal of the existing engineered
8 fill from under the tank foundations and replacement with
9 concrete, the installation of prestressed rock anchors
10 around the tank circumference penetrating into bedrock.

11 With these modifications, which are shown in
12 Figure 3, the actual stresses or required strength for the
13 tank or tanks were less than the allowable stresses or design
14 strengths. Resistance to overturning or sliding were also
15 satisfactory for the Hosgri earthquake.

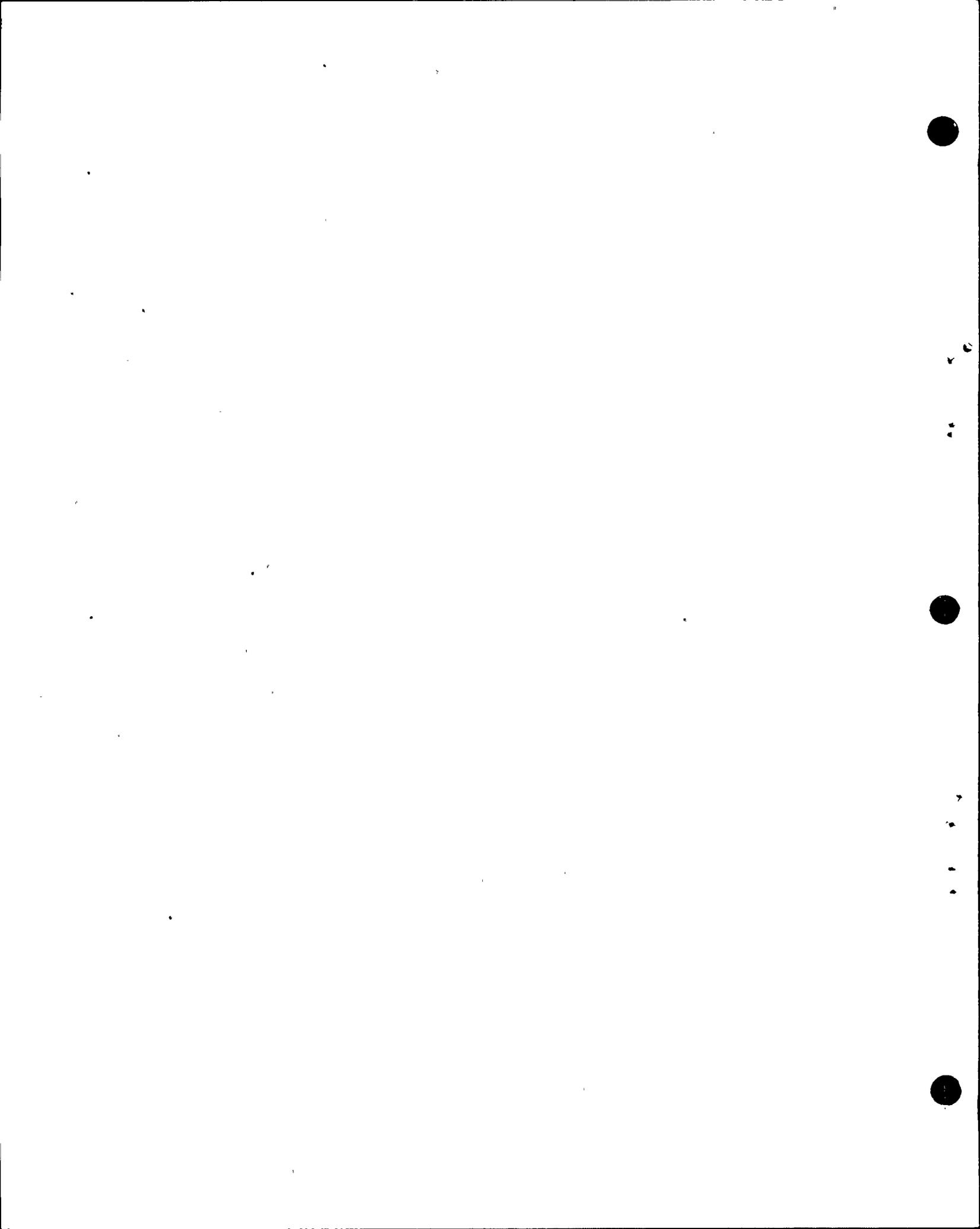
16 The conclusion of this testimony is that the
17 design class one outdoor tanks, with the modifications des-
18 cribed, are capable of withstanding the postulated magnitude
19 7.5 Hosgri earthquake.

20 That concludes my summary.

21 MR. NORTON: Mrs. Bowers, we would ask that the
22 testimony be placed in the record as though read at this time.

23 And I would assume we'd take a lunch break now
24 instead of passing for cross.

25 MRS. BOWERS: Any objection to the material being



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placed into the record as if read?

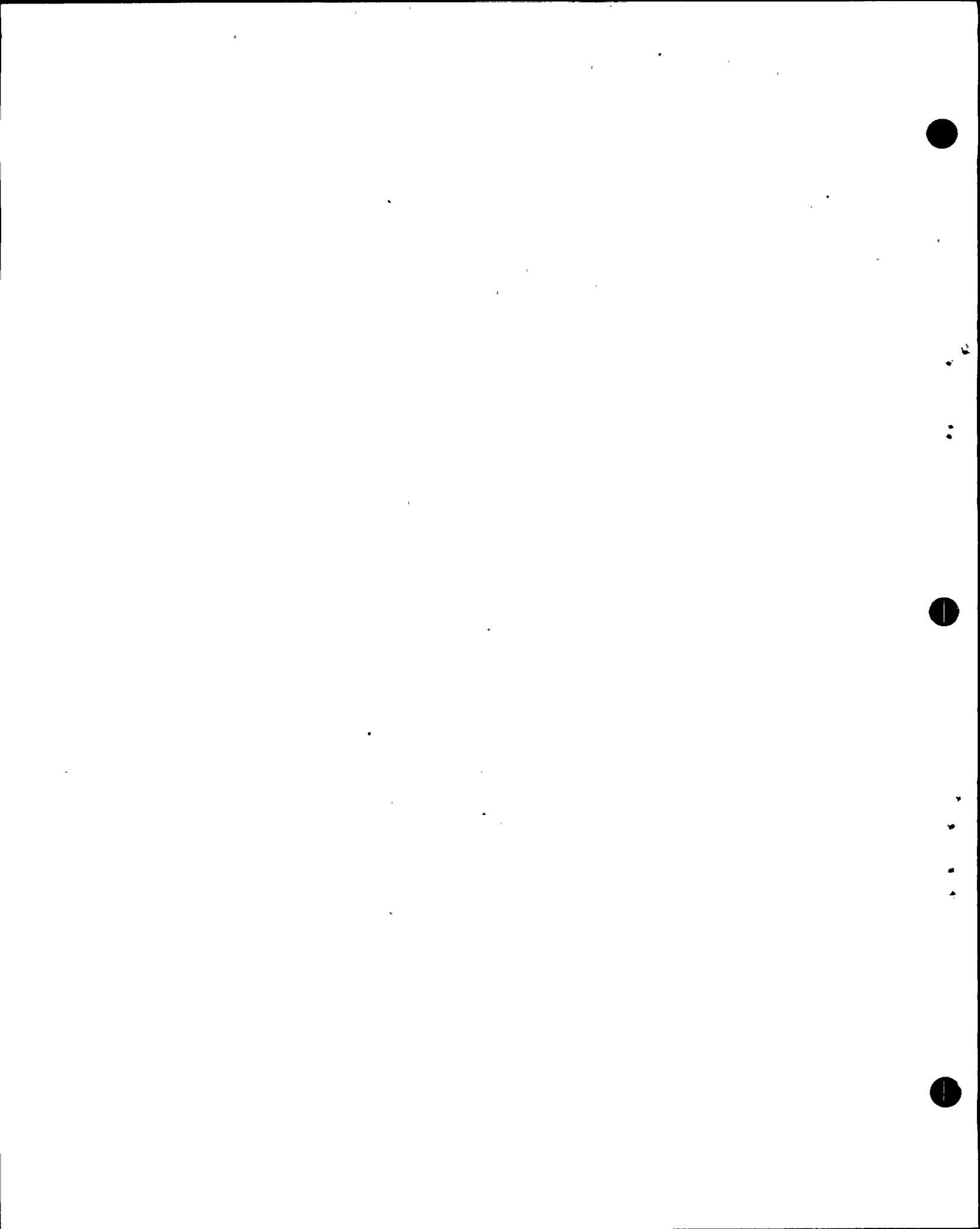
MR. KRISTOVICH: No objection.

MRS. BOWERS: Mr. Ketchen?

MR. KETCHEN: No objection.

MRS. BOWERS: Well, Mr. Norton, the testimony you have referred to will be placed into the record as if read, and it will be physically inserted into the transcript.

(The Hosgri Analysis and Evaluation of the Outdoor Water Storage Tanks follows:)



1 TESTIMONY OF
2 VINCENT J. GHIO
3 AND
4 DILIP JHAVERI
5 ON BEHALF OF
6 PACIFIC GAS AND ELECTRIC COMPANY
7 DECEMBER 4, 1978
8 DOCKET NOS. 50-275, 50-323

9 HOSGRI ANALYSIS AND EVALUATION
10 OF THE OUTDOOR WATER STORAGE TANKS

11 The Design Class 1 outdoor tanks consist of two
12 refueling water storage tanks and two condensate storage
13 tanks (one for each unit) and a firewater and transfer
14 storage tank common to both units (see Figure 1).

15 The tanks are 40 feet in diameter, average 50 feet
16 in height, and were originally constructed as steel tanks
17 anchored to a concrete foundation on an engineered fill of
18 varying depth.

19 The outdoor tanks were analyzed for the Newmark
20 free-field horizontal spectra (normalized to 0.75g) as input
21 which is generally higher than the Blume spectra for all
22 frequencies. No adjustment for foundation size effects were
23 taken as the tanks are relatively small in plan dimension.
24 The vertical spectra were taken as two-thirds the horizontal
25 spectra. Damping was assumed according to Regulatory Guide
26 1.61, i.e., 7% damping for concrete and 4% damping for
steel.



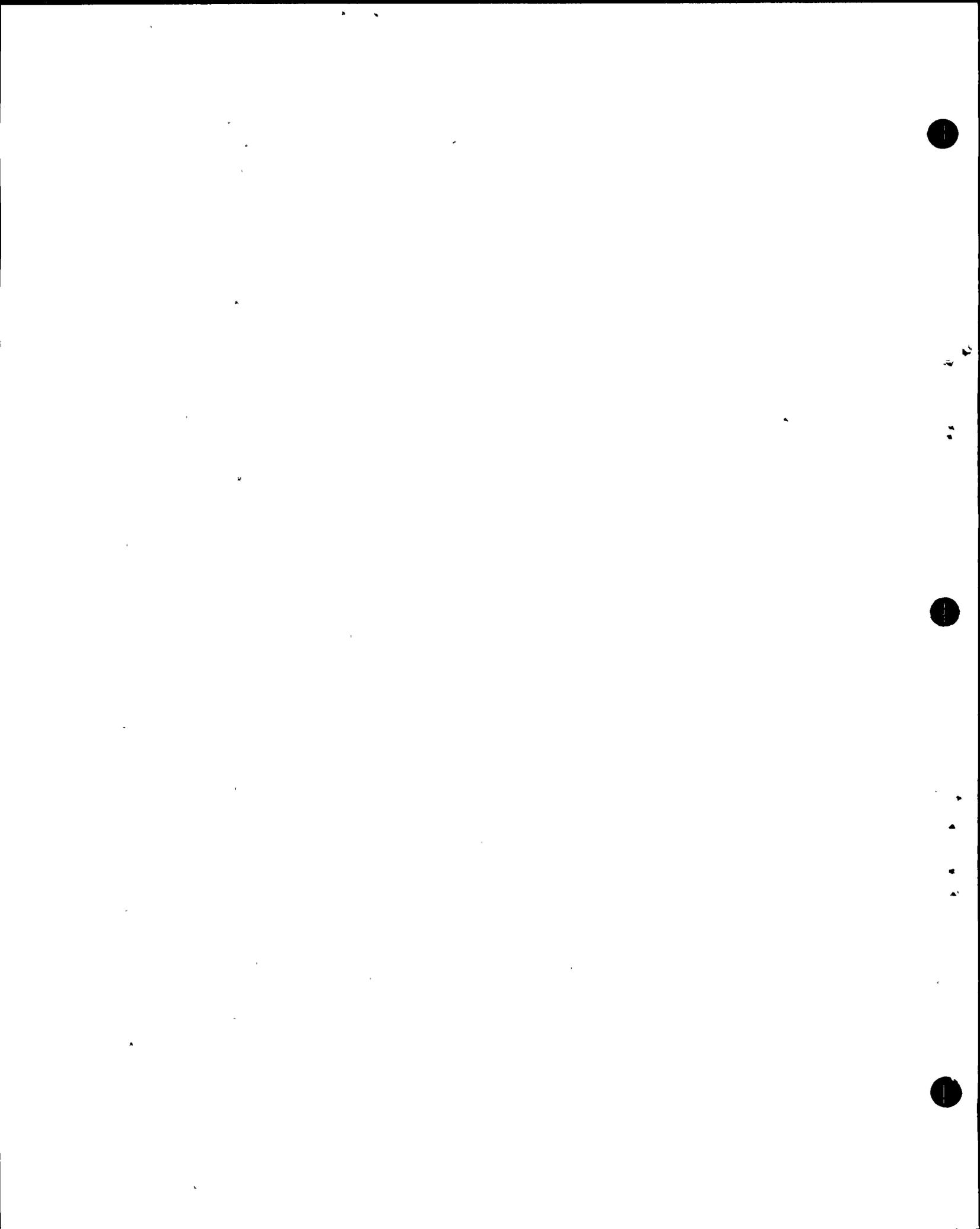
1 The effect of interaction between the tank and the
2 contained fluid under horizontal excitation was considered
3 in the analysis.

4 The structure was analyzed for the dead load and
5 hydrostatic load in addition to the earthquake loads. The
6 responses from the three components of earthquakes were
7 combined by the square-root-sum-of-squares procedure in
8 accordance with Regulatory Guide 1.92.

9 The analysis was made by a computer program which
10 assumes that the structure is axisymmetric. A finite element
11 model for the refueling water storage tank is shown in
12 Figure 2.

13 In each of the tanks, there is a vault opening at
14 the base on the east side. To determine the effects of such
15 an opening, one of the tanks - the refueling water storage
16 tank - was also analyzed using a 3-dimensional model without
17 using the assumption of axisymmetry. The earthquake effects
18 were computed using equivalent static loads based on the
19 dynamic response accelerations computed from the axisymmetric
20 model. As expected, the stresses around and near the opening
21 were different from those given by the axisymmetric analysis.
22 The stresses were checked for the more conservative of the
23 two analyses and modifications made as necessary to meet the
24 acceptance criteria.

25 The tanks were originally designed as steel tanks
26 capable of withstanding the Double Design Earthquake loading.



1 The hydrodynamic pressure exerted by the fluid on the tank,
2 due to horizontal earthquake motion, was calculated by a
3 method generally accepted at the time. This method assumes
4 that the tank is rigid. In the Hosgri analysis a currently
5 accepted methodology was utilized.

6 Because of the increase in calculated seismic
7 loads, due to the higher seismic input and the use of current
8 methodology major modifications have been specified for the
9 tanks. These modifications consist of the following:

10 1. Complete reinforced concrete encasement of
11 the original steel shell varying in thickness from 36 inches
12 at the base to 12 inches at the midheight to 8 inches for
13 the upper part including the top dome.

14 2. Addition of a 2 foot wide by 4-1/2 foot deep
15 reinforced concrete foundation ring.

16 3. Complete removal of existing engineered fill
17 from under the tank foundations and replacement with concrete.

18 4. Installation of 46 prestressed rock anchors
19 around the tank circumference penetrating into bedrock.

20 With these modifications, shown in Figure 3, the
21 maximum stresses are shown together with allowable stresses
22 in Tables 1 through 4 for the steel plate elements of each
23 tank. Table 5 presents required strength versus design
24 strength comparisons for the concrete elements of the re-
25 fueling water storage tank. Similar results were determined
26 for the concrete elements of the other tanks. In all cases

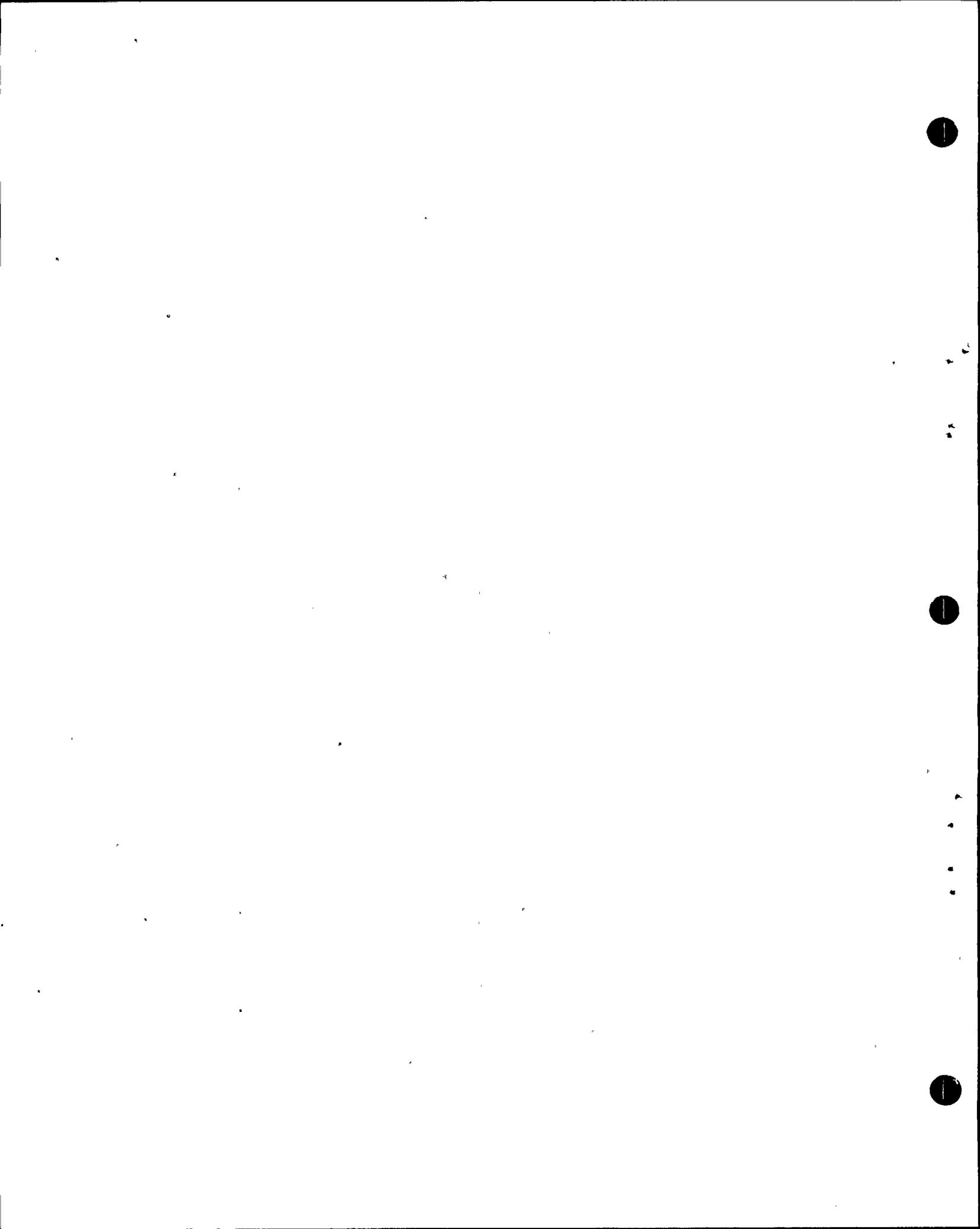


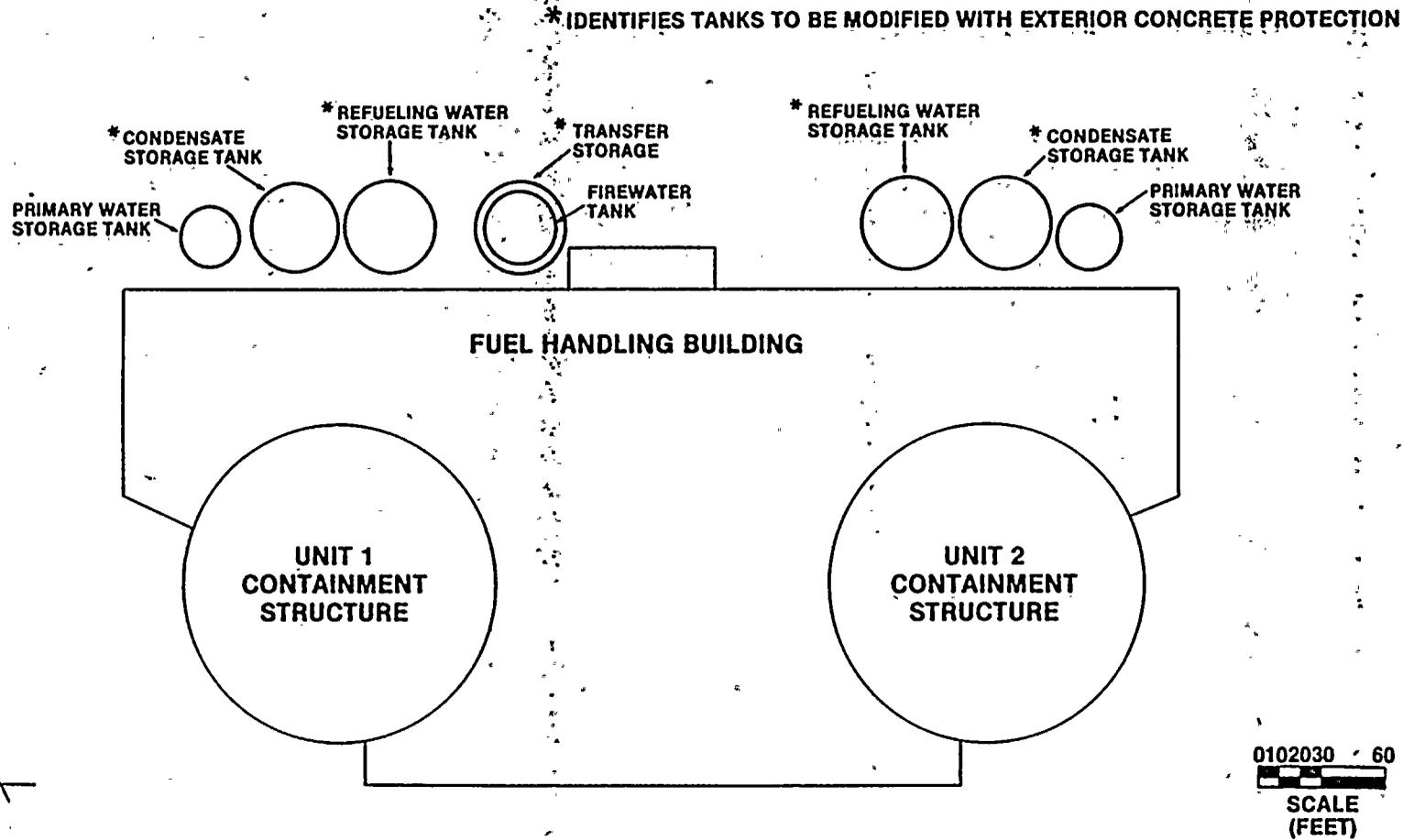
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the actual stresses or required strengths were less than the allowable stresses or design strengths.

Resistance to overturning and sliding were also determined to be satisfactory for the Hosgri earthquake.

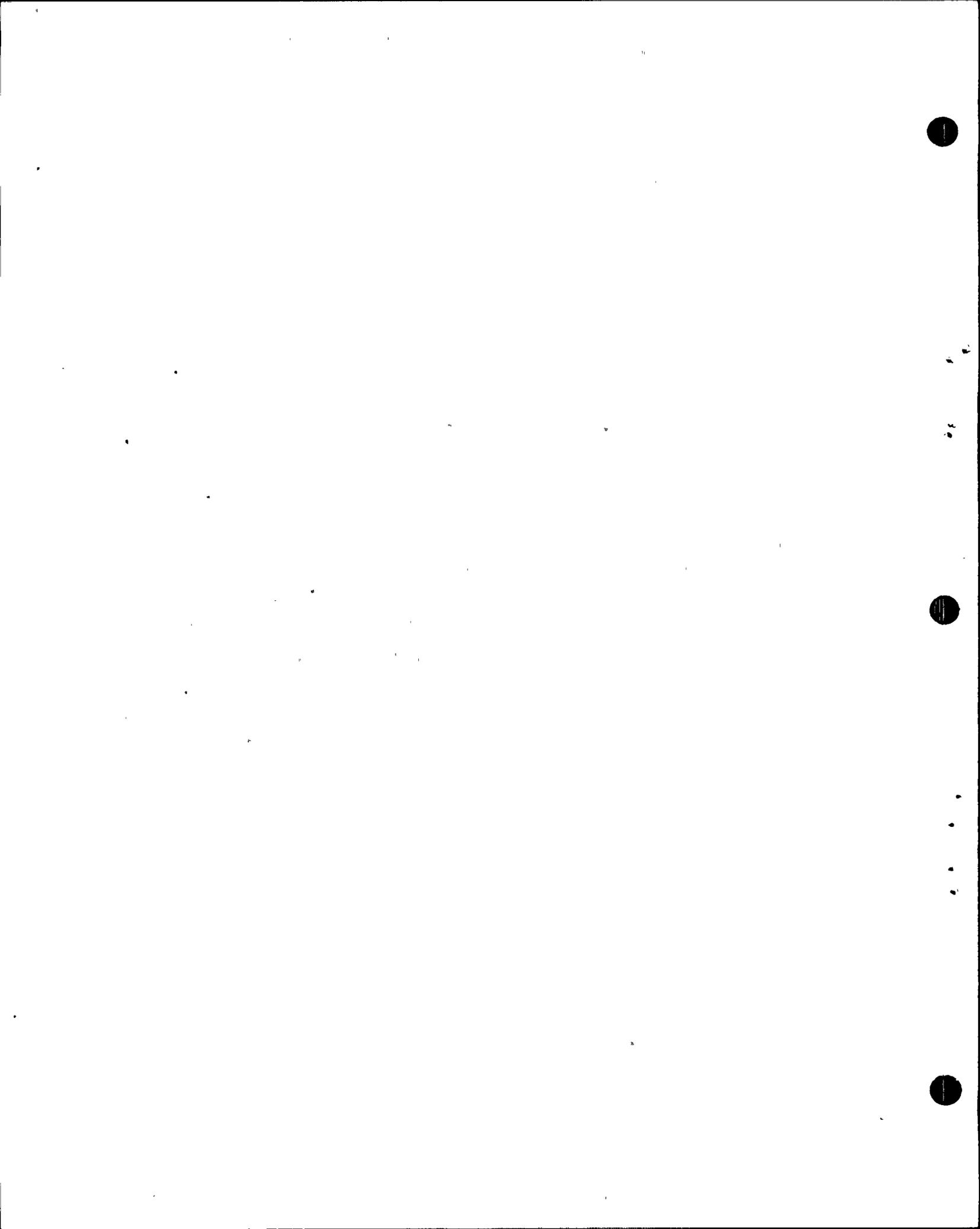
Thus we conclude that the Design Class I Outdoor Tanks, with the modifications described, are capable of withstanding the postulated Hosgri earthquake.



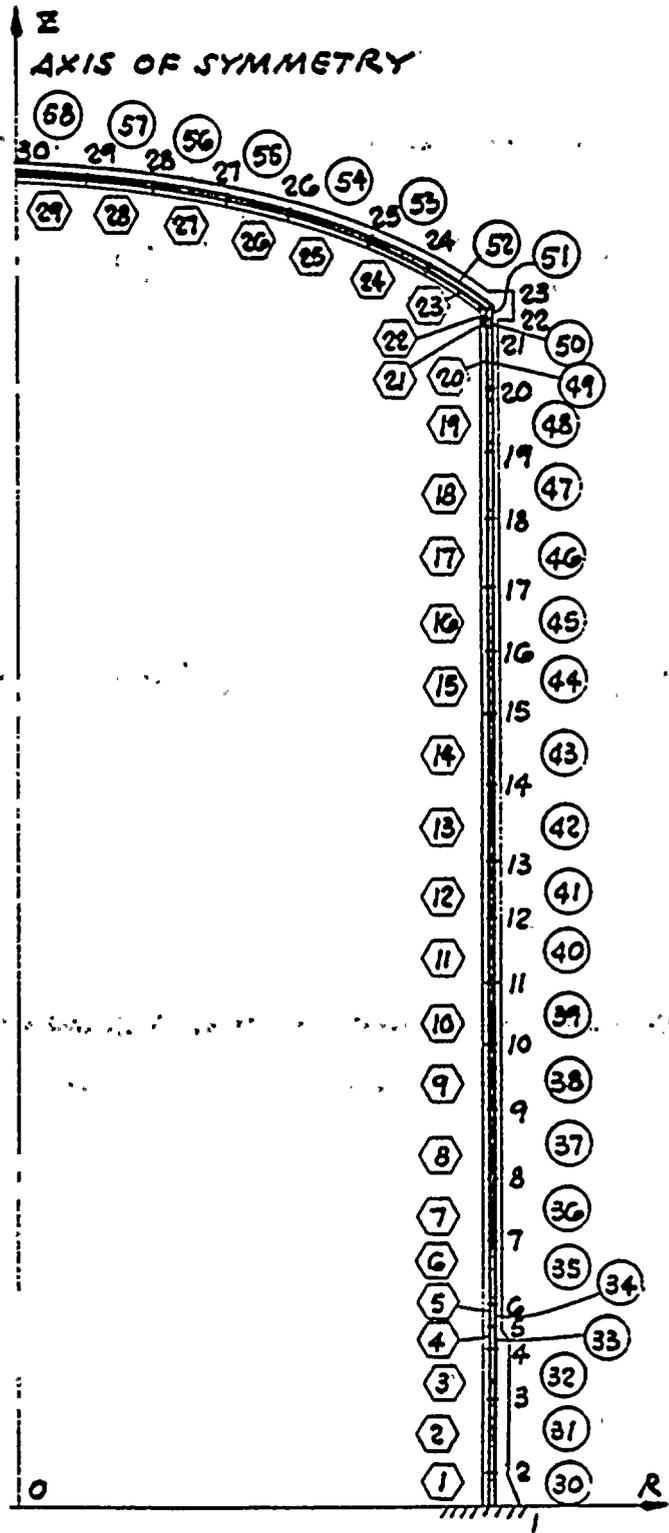


**DIABLO CANYON UNITS 1 & 2
OUTDOOR WATER STORAGE TANKS**

FIGURE 1

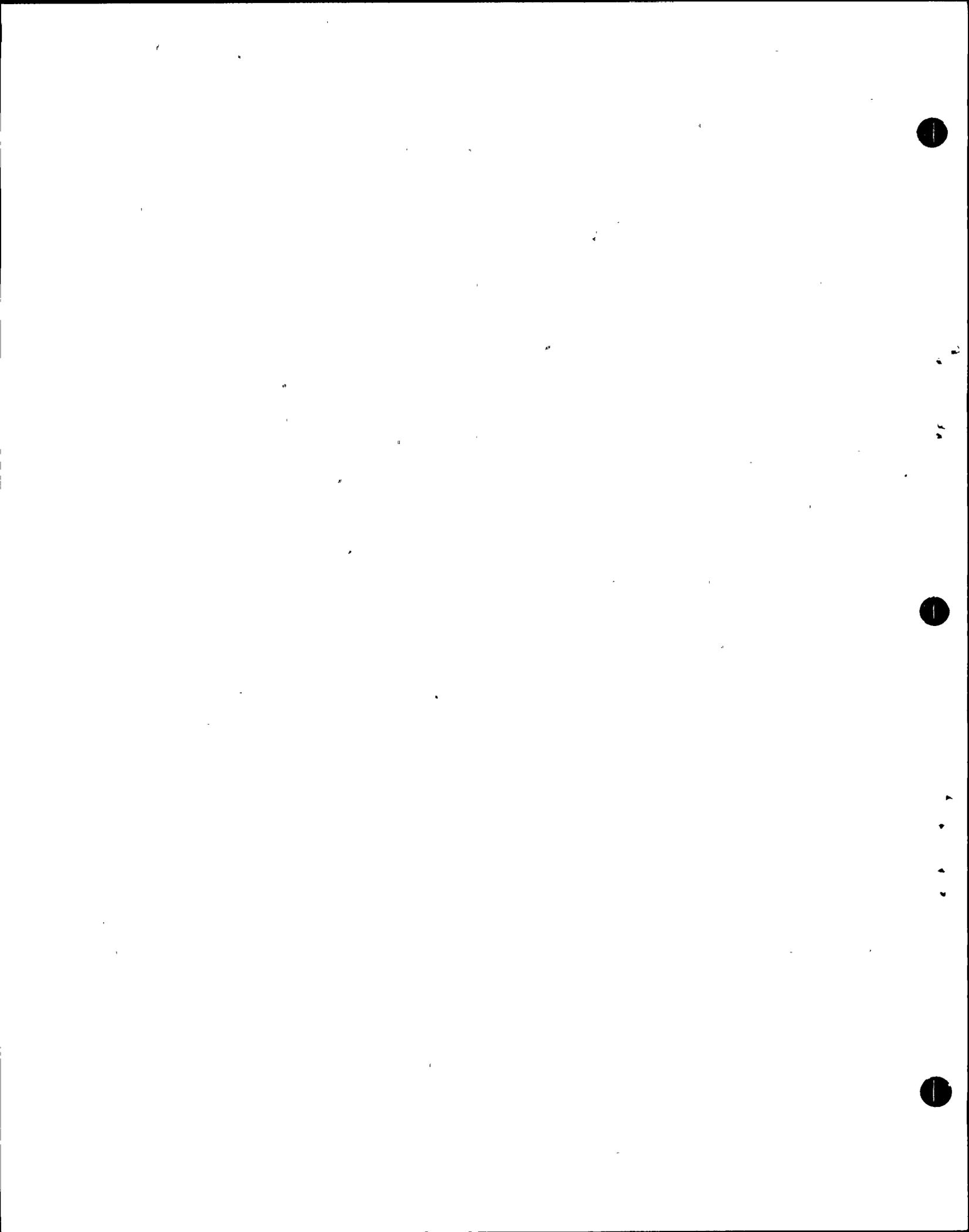


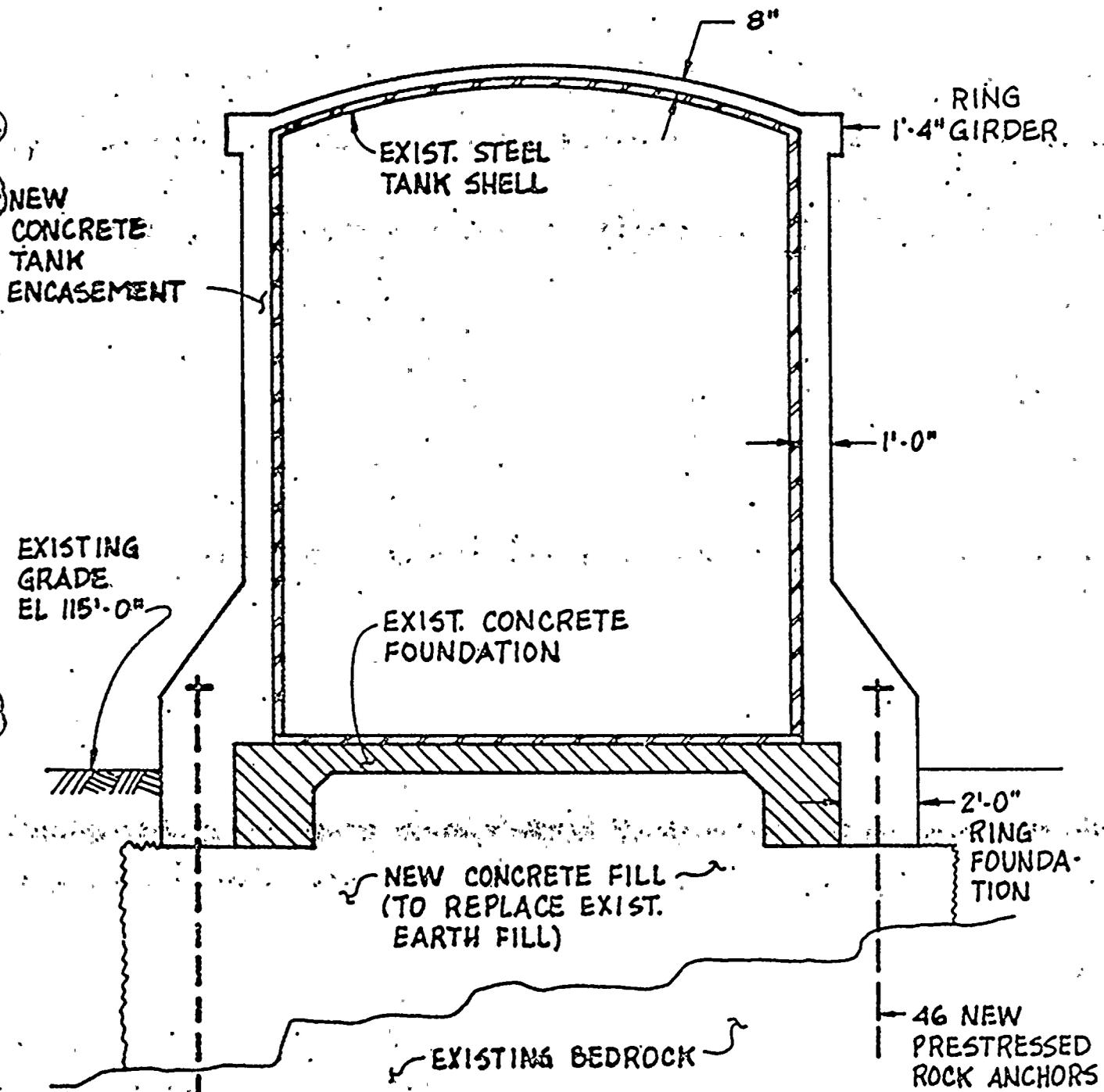
- LEGEND**
- N NODAL POINT
 - (N) CONCRETE SHELL ELEMENT
 - (N) STEEL SHELL ELEMENT



DIABLO CANYON UNITS 1 & 2
REFUELING WATER STORAGE TANK
AXISYMMETRIC FINITE ELEMENT MODEL

FIGURE 2





TYPICAL MODIFIED TANK SECTION

DIABLO CANYON UNITS 1 & 2
 OUTDOOR STORAGE TANKS
 FIGURE 3



TABLE 1
 DIABLO CANYON UNITS 1 AND 2
 REFUELING WATER STORAGE TANK:
 MAXIMUM STRESS INTENSITIES IN STEEL ELEMENTS
 (AXIDYN ANALYSIS, AXISYMMETRIC MODEL)

NODAL POINTS	PLATE THICKNESS, INCHES	MAXIMUM STRESS INTENSITY, KSI		ALLOWABLE STRESS INTENSITY, KSI	
		DL + HS	DL + HS + HE + VE	DL + HS	DL + HS + HE + VE
1 - 6	0.578	3.58	18.40*	16.7	25.05
6 - 9	0.490	4.52	19.63*	16.7	25.05
9 - 12	0.356	4.59	13.33	16.7	25.05
12 - 15	0.275	3.64	17.25	16.7	25.05
15 - 30	0.250	2.17	12.12	16.7	25.05

NOTE: DL - DEAD LOAD

HE - HORIZONTAL EARTHQUAKE COMPONENT

HS - HYDROSTATIC PRESSURE

VE - VERTICAL EARTHQUAKE COMPONENT

* ON THE BASIS OF ANALYSIS OF A NON-AXISYMMETRIC MODEL OF THE REFUELING TANK USING THE SAP IV COMPUTER PROGRAM, THE PLATE WILL BE REINFORCED TO REDUCE STRESSES TO BE WITHIN ALLOWABLE STRESS INTENSITY (SEE TABLE 5).

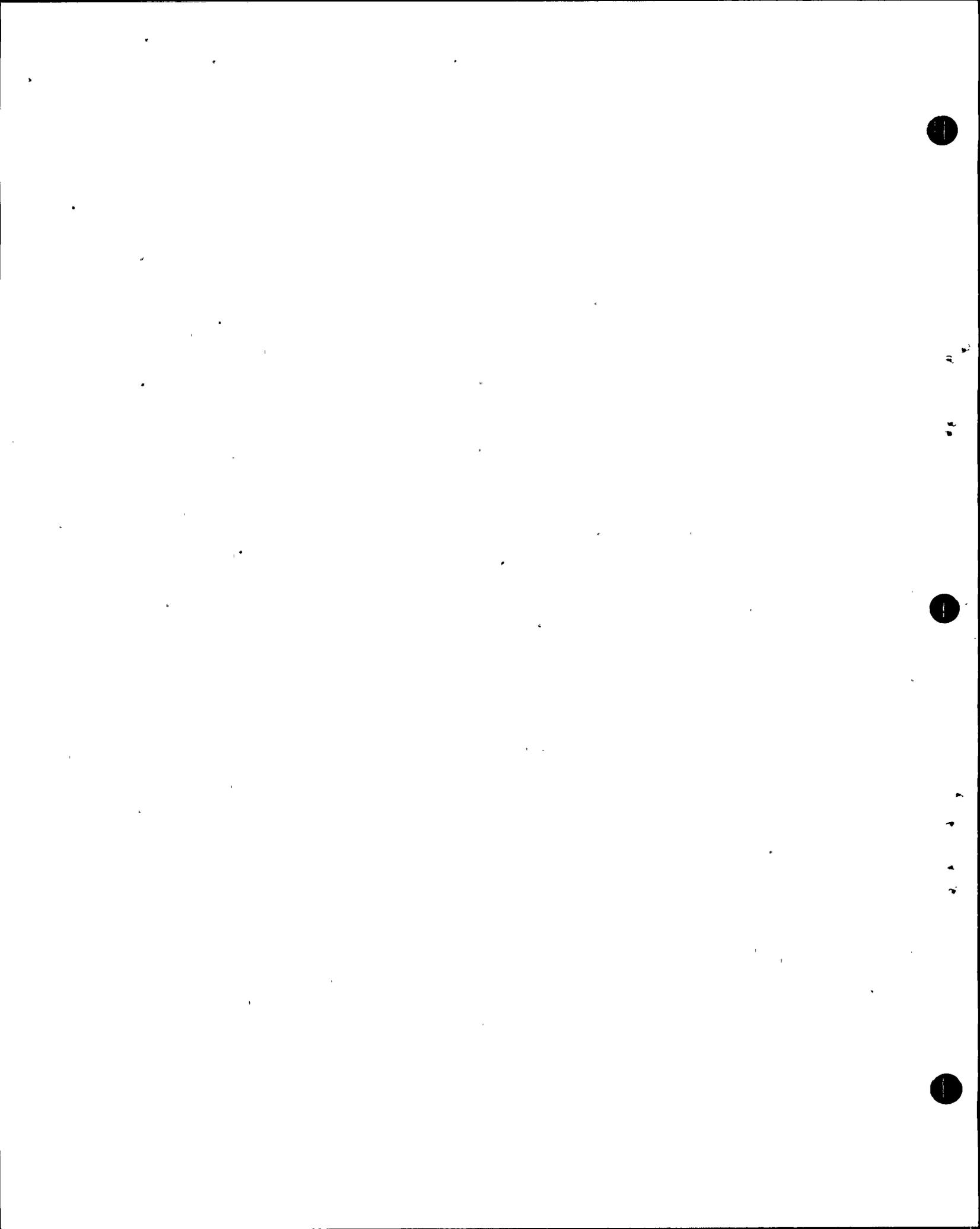


TABLE 2
 DIABLO CANYON UNITS 1 AND 2
 FIREWATER TANK:
 MAXIMUM STRESS INTENSITIES IN STEEL ELEMENTS
 (AXIDYN ANALYSIS, AXISYMMETRIC MODEL)

NODAL POINTS	PLATE THICKNESS, INCHES	MAXIMUM STRESS INTENSITY, KSI		ALLOWABLE STRESS INTENSITY, KSI	
		DL + HS	DL + HS + HE + VE	DL + HS	DL + HS + HE + VE
46 - 43	0.813	8.20	21.38	18.3	27.45
43 - 40	0.688	5.59	20.87	18.3	27.45
40 - 37	0.625	5.20	19.77	18.3	27.45
37 - 34	0.531	4.59	18.48	18.3	27.45
34 - 28	0.438	3.89	17.04	18.3	27.45
28 - 22	0.375	3.17	24.93	18.3	27.45

NOTE: DL - DEAD LOAD

HE - HORIZONTAL EARTHQUAKE COMPONENT

HS - HYDROSTATIC PRESSURE

VD - VERTICAL EARTHQUAKE COMPONENT

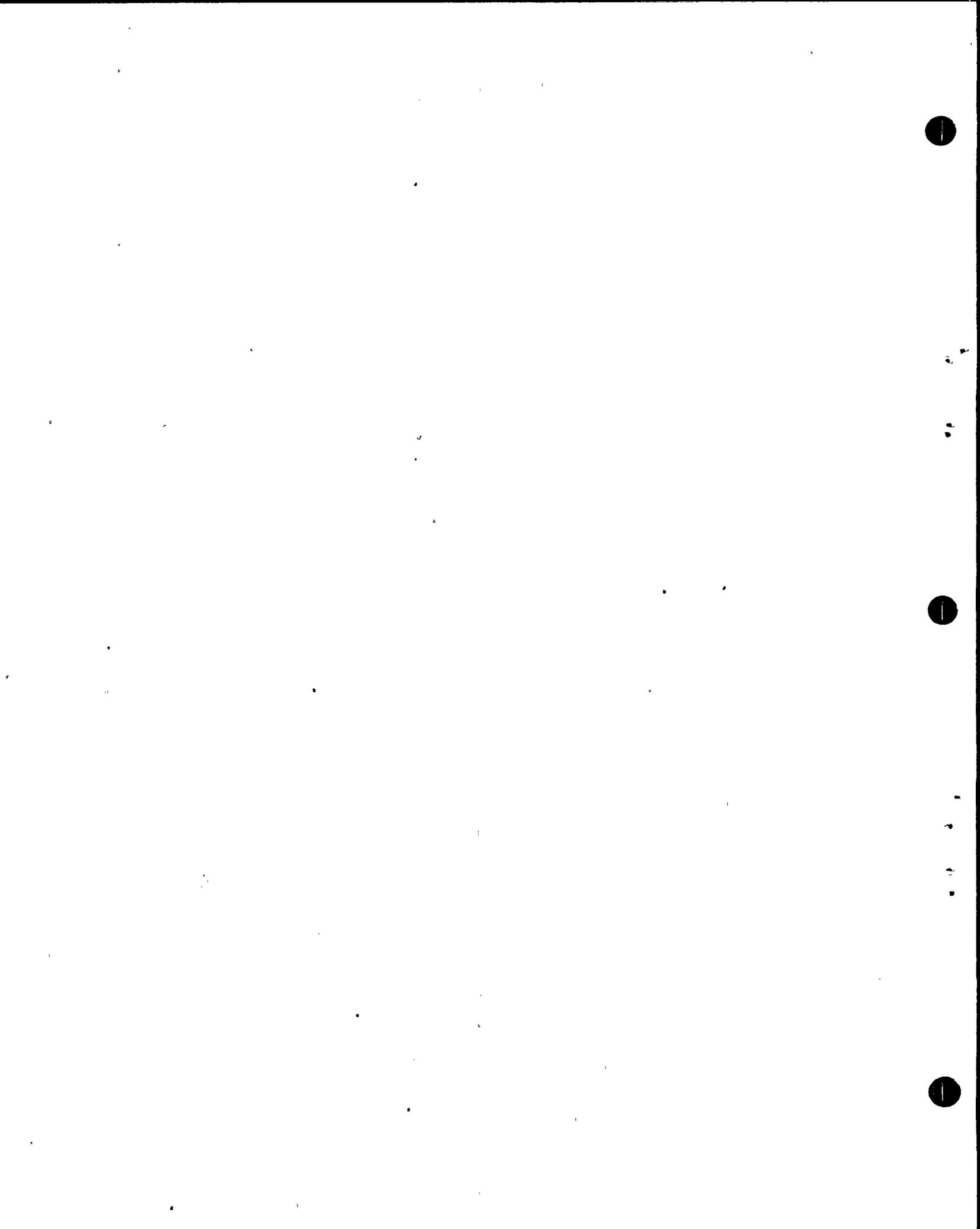


TABLE 3
 DIABLO CANYON UNITS 1 AND 2
 TRANSFER TANK:
 MAXIMUM STRESS INTENSITIES IN STEEL ELEMENTS
 (AXIDYN ANALYSIS, AXISYMMETRIC MODEL)

NODAL POINTS	PLATE THICKNESS, INCHES	MAXIMUM STRESS INTENSITY, KSI		ALLOWABLE STRESS INTENSITY, KSI	
		DL + HS	DL + HS + HE + VE	DL + HS	DL + HS + HE + VE
1 - 6	0.627	3.63	15.36*	18.3	27.45
6 - 9	0.522	3.55	16.06*	18.3	27.45
9 - 12	0.417	3.39	14.46	18.3	27.45
12 - 15	0.313	2.70	11.92	18.3	27.45
15 - 33	0.250	1.60	9.39	18.3	27.45

NOTE: DL - DEAD LOAD

HE - HORIZONTAL EARTHQUAKE COMPONENT

HS - HYDROSTATIC PRESSURE

VE - VERTICAL EARTHQUAKE COMPONENT

* ON THE BASIS OF ANALYSIS OF A NON-AXISYMMETRIC MODEL OF THE REFUELING TANK USING THE SAP IV COMPUTER PROGRAM, THE PLATE WILL BE REINFORCED TO REDUCE STRESSES TO BE WITHIN ALLOWABLE STRESS INTENSITY (SEE TABLE 5).

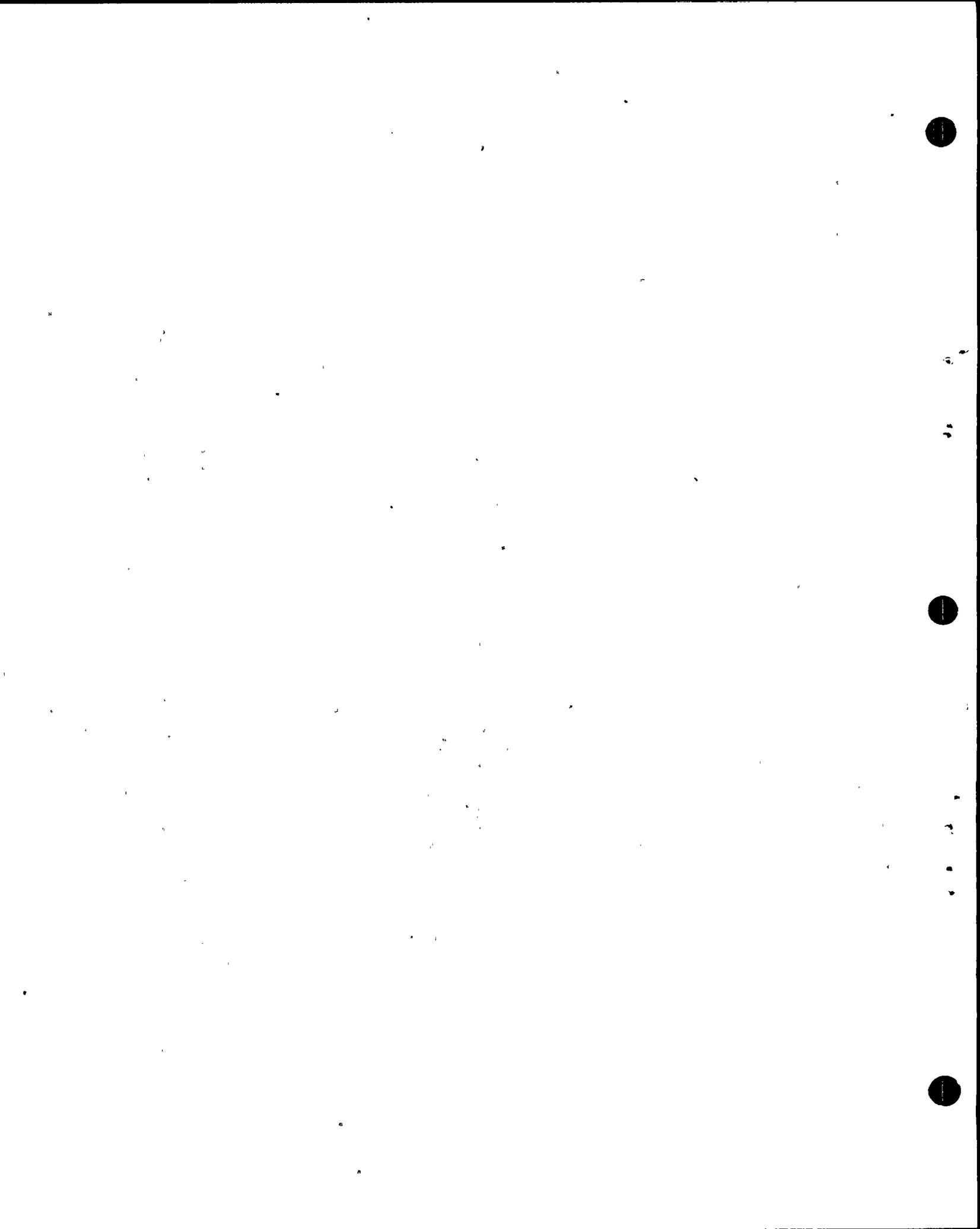


TABLE 4
 DIABLO CANYON UNITS 1 AND 2
 CONDENSATE TANK:
 MAXIMUM STRESS INTENSITIES IN STEEL ELEMENTS
 (AXIDYN ANALYSIS, AXISYMMETRIC MODEL)

PLATE THICKNESS, INCHES	MAXIMUM STRESS INTENSITY, KSI		ALLOWABLE STRESS INTENSITY, KSI	
	DL + HS	DL + HS + HE + VE	DL + HS	DL + HS + HE + VE
0.600	3.84	18.13*	18.3	27.45
0.500	5.07	20.80*	18.3	27.45
0.398	4.87	18.83	18.3	27.45
0.297	4.26	17.29	18.3	27.45
0.250	2.89	13.24	18.3	27.45

NOTE: DL - DEAD LOAD

HE - HORIZONTAL EARTHQUAKE COMPONENT

HS - HYDROSTATIC PRESSURE

VE - VERTICAL EARTHQUAKE COMPONENT

* ON THE BASIS OF ANALYSIS OF A NON-AXISYMMETRIC MODEL OF THE REFUELING TANK USING THE SAP IV COMPUTER PROGRAM, THE PLATE WILL BE REINFORCED TO REDUCE STRESSES TO BE WITHIN ALLOWABLE STRESS INTENSITY (SEE TABLE 5).

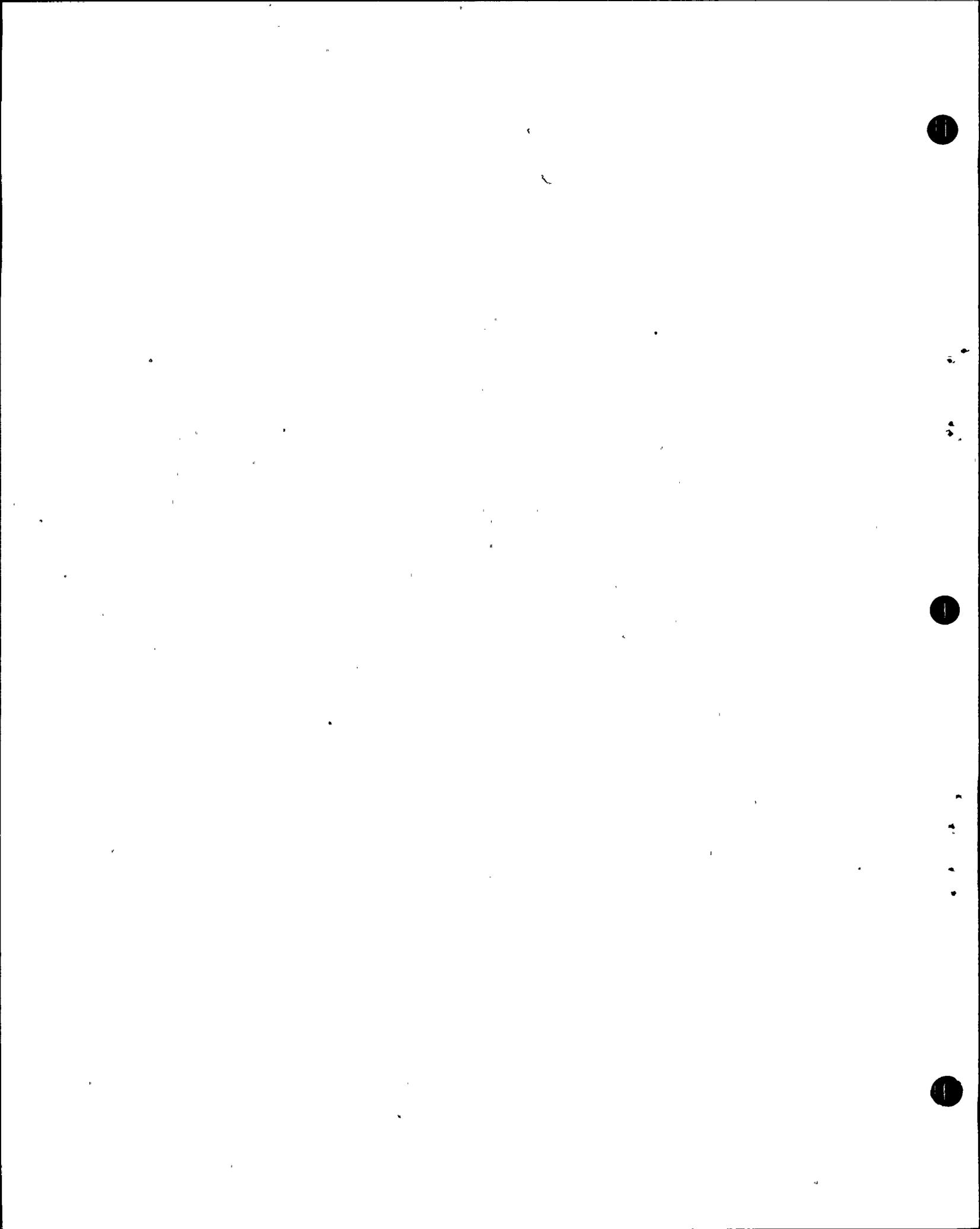


TABLE 5
 DIABLO CANYON UNITS 1 AND 2
 REFUELING WATER STORAGE TANK:
 MAXIMUM STRESS INTENSITIES IN STEEL ELEMENTS
 (SAP IV ANALYSIS, NON-AXISYMMETRIC MODEL)

ELEMENT NUMBER	PLATE THICKNESS, INCHES	MAXIMUM STRESS INTENSITY, KSI		ALLOWABLE STRESS INTENSITY, KSI	
		DL + HS	DL + HS + HE + VE	DL + HS	DL + HS + HE + VE
49	0.578	11.12	23.86*	16.7	25.05
65	0.490	12.22	26.56*	16.7	25.05
156	0.356	2.59	10.50	16.7	25.05
196	0.275	2.82	11.90	16.7	25.05
231	0.250	2.05	8.62	16.7	25.05

NOTE: DL - DEAD LOAD

HE - HORIZONTAL EARTHQUAKE COMPONENT

HS - HYDROSTATIC PRESSURE

VE - VERTICAL EARTHQUAKE COMPONENT

* THE PLATE WILL BE REINFORCED TO REDUCE STRESSES TO BE WITHIN ALLOWABLE STRESS INTENSITY.

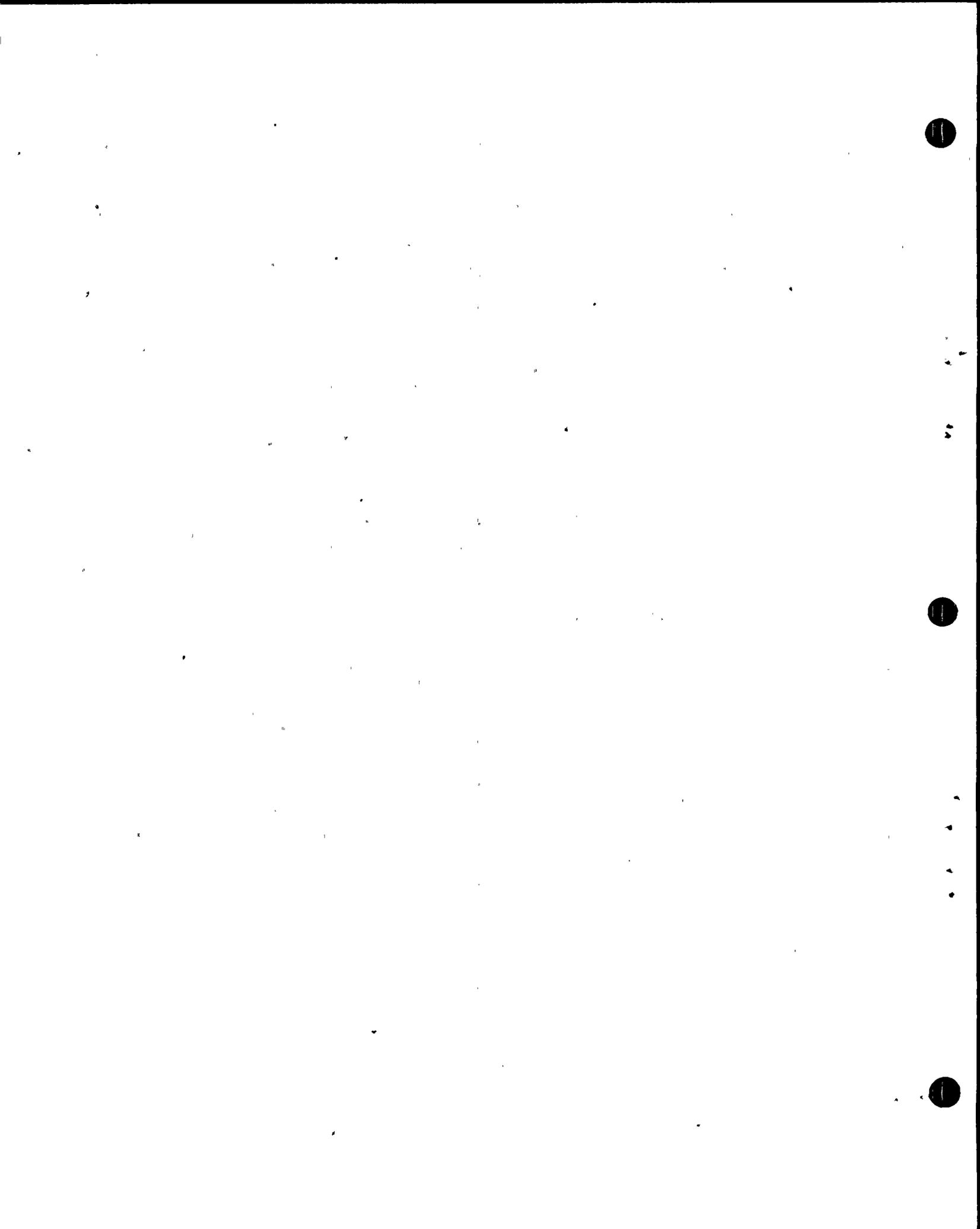
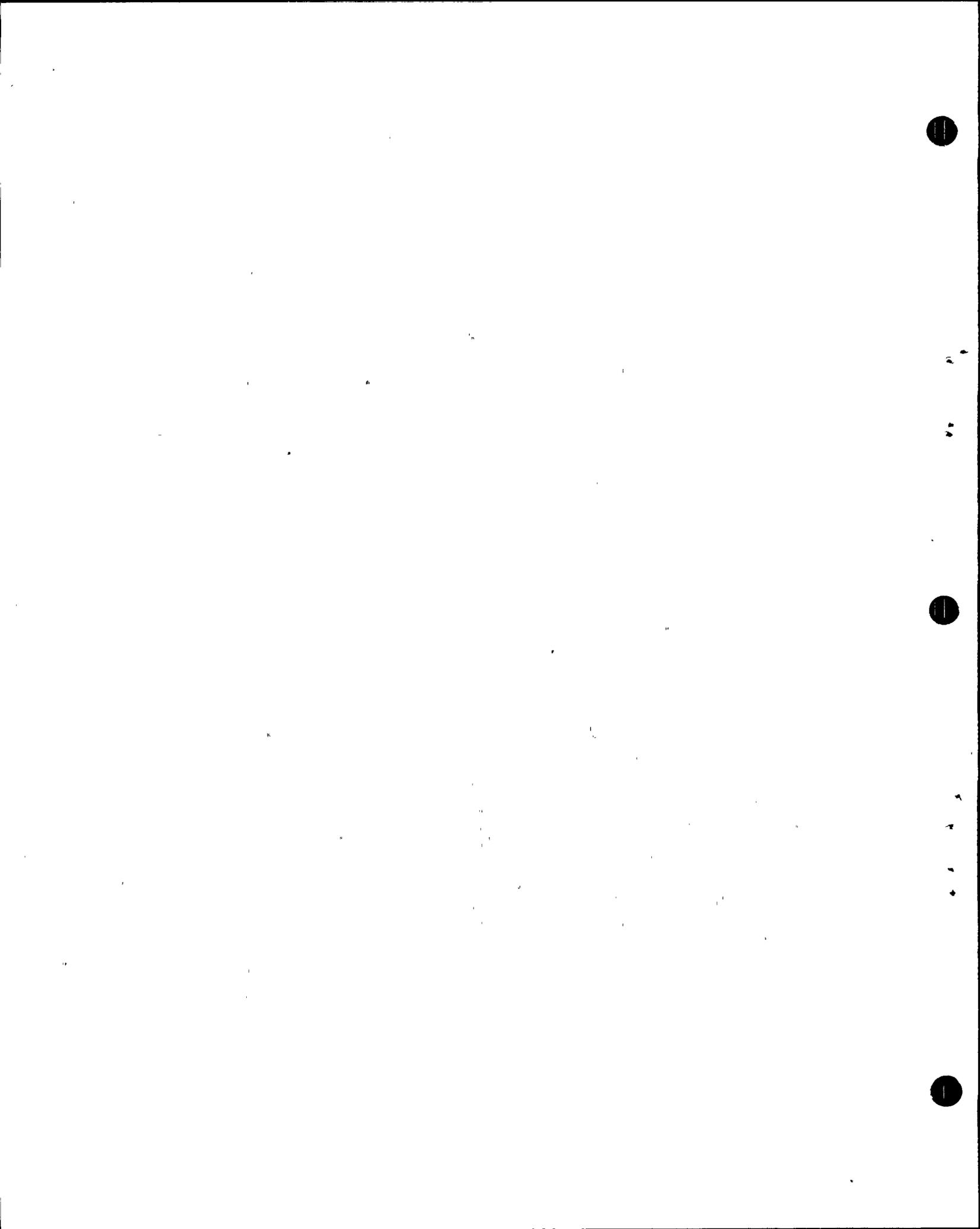


TABLE 6
DIABLO CANYON UNITS 1 and 2
REFUELING WATER STORAGE TANK:
STRENGTH COMPARISON OF CONCRETE ELEMENTS
(SAP IV ANALYSIS; NON-AXISYMMETRIC MODEL)

ELEMENT NUMBER	MOMENT, KIP-FT/FT				FORCE, KIP/FT				SHEAR, KIP/FT	
	LONGITUDINAL		CIRCUMFERENTIAL		LONGITUDINAL		CIRCUMFERENTIAL		REQUIRED STRENGTH	DESIGN STRENGTH
	REQUIRED STRENGTH	DESIGN STRENGTH								
534	0.97	19.72	0.80	19.72	35.78	238.57	56.01	238.57	50.22	92.18 57.6
463	0.86	97.30	1.15	35.56	68.30	492.24	72.42	329.96	60.88	156.41 77.4
386	0.76	71.78	3.84	35.56	102.10	400.96	41.79	329.96	65.16	156.41 77.4
375	4.08	71.78	20.21	35.56	107.15	400.96	25.23	329.96	60.46	156.41 77.4

NOTE: CALCULATIONS BASED ON 1-FT-WIDTH BEAM.



mpbl

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MRS. BOWERS: And we'll take the luncheon break

2

now.

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(Whereupon, at 12:05 p.m., the hearing in the

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above-entitled matter was recessed, to reconvene at

5

1:00 p.m., this same day.)

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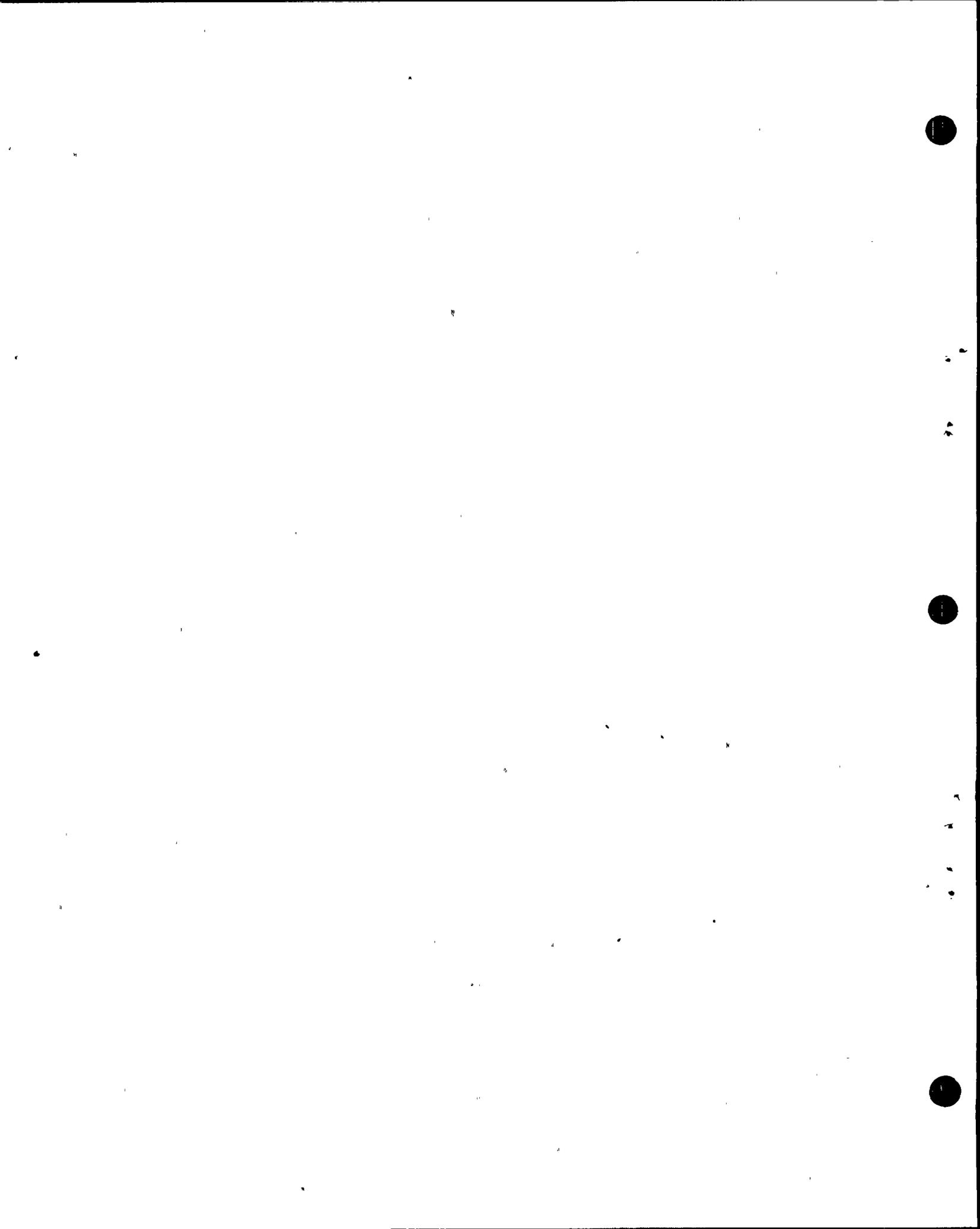
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AFTERNOON SESSION

WRB/wbl

(1:00 p.m.)

3 MRS. BOWERS: Are we ready to begin?

4 Whereupon,

5 DILIP P. JHAVERI

6 VINCENT J. GHIO

7 JOHN A. BLUME

8 OSCAR A. ROCHA

9 RALPH T. YOKOYAMA

10 resumed the stand as witnesses for and on behalf of the
11 Applicant and, having been previously duly sworn, were examined
12 and testified further as follows:

13 MR. NORTON: We're ready to pass the panel for

14 CROSS.

15 MRS. BOWERS: Mr. Kristovich?

16 CROSS-EXAMINATION

17 BY MR. KRISTOVICH:

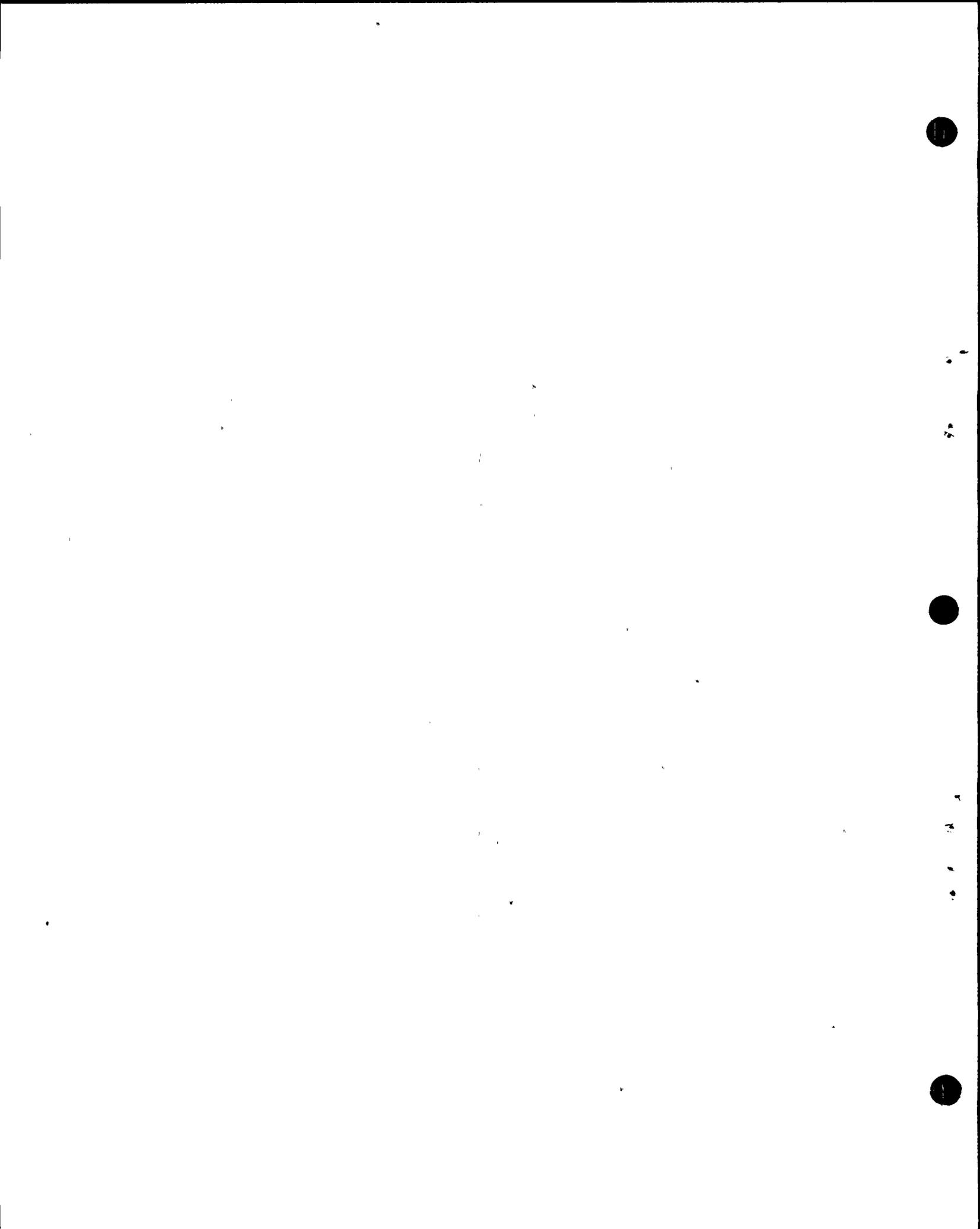
18 Q Mr. Ghio, were the outdoor water storage tanks
19 originally designed as Category 2 structures?

20 A (Witness Ghio) No, they were not. They were
21 design Category 1.

22 Q Turning to page 3 of your written testimony, at
23 line 8 you state that "Major modifications have been specified."
24 Have these modifications been accomplished?

25 A The modifications are in progress.

16 XXXXXXXX



1 Q You have a list of four modifications on that
2 page. Are each of these still in progress?

3 A Let's see: I think I'll ask Oscar Rocha to
4 answer that question.

5 A (Witness Rocha) Quite a bit of the prescribed
6 modifications are under way. Basically what has been
7 accomplished at this time is replacing the earth fill that
8 was under those tanks with new concrete. That's completed.
9 There are several stages of these. Like we have partial
10 reinforcement in place, other preparations have been performed.
11 But the work is under way.

12 Q Okay.

13 Can you explain how Modification No. 3, the
14 removal of the existing fill from under the tank foundations
15 was accomplished?

16 A Yes. We drilled piers around the perimeter of
17 the existing tank, little holes in the ground, and we poured
18 those holes with concrete, reinforced concrete. Then those
19 piers served as shoring while the excavation was performed
20 by hand.

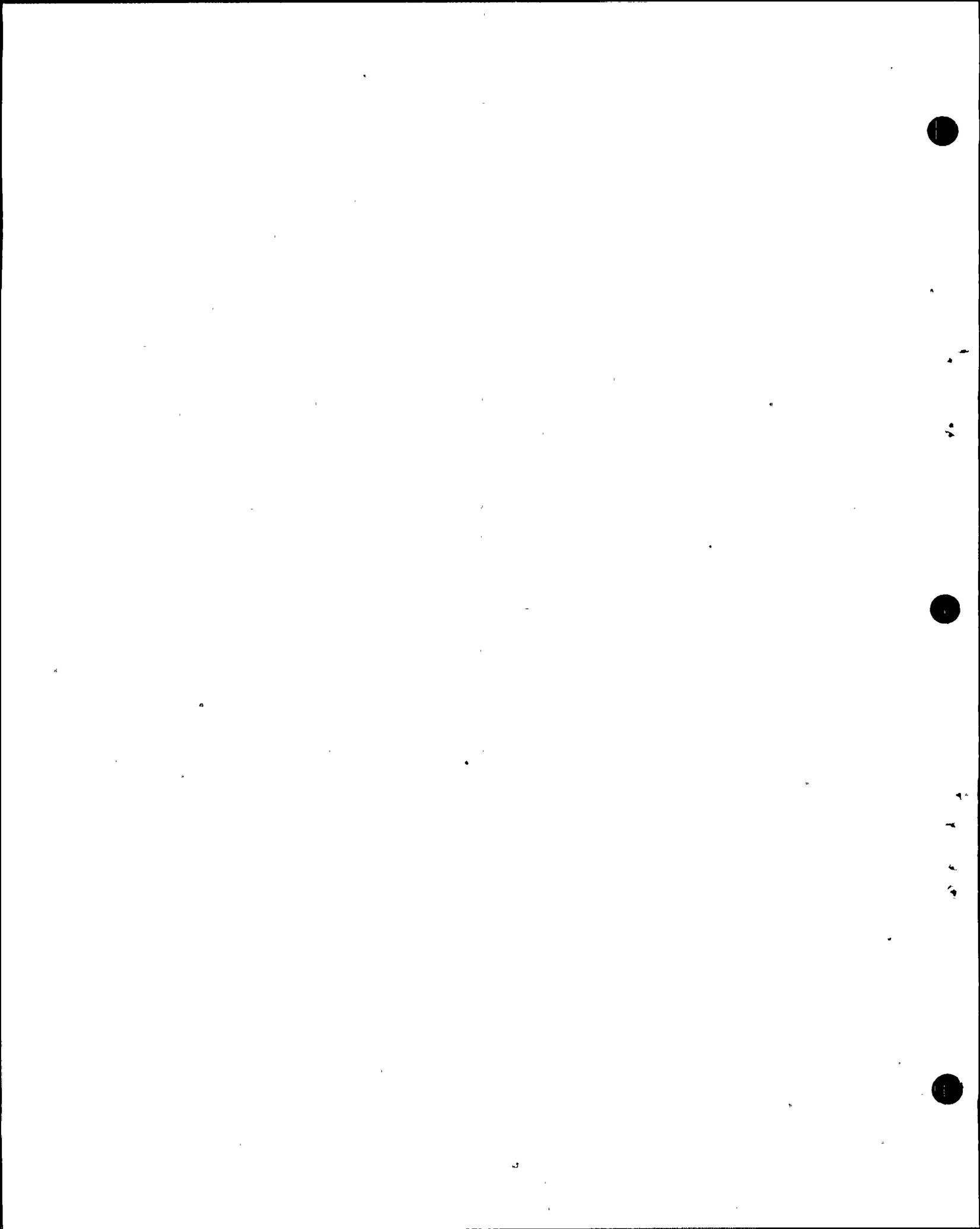
21 Q So the fill was removed by hand?

22 A The fill was removed by hand.

23 Q Directing your attention to page 2, line 10 and
24 line 17, could you describe an axisymmetric analysis?

25 A (Witness Ghio) I'll have Dr. Jhaveri respond to

WRR/wb2



1 that question.

2 A (Witness Jhaveri) The axisymmetric analysis
3 refers to the symmetry of the structure about a vertical
4 axis. The assumption is made that the structure is symmetric
5 about a vertical axis. An analysis made based on that assump-
6 tion is called an axisymmetric analysis.

7 Q Okay.

8 Could you describe a non-axisymmetric analysis?

9 A An analysis that does not assume that the struc-
10 ture is axisymmetric about the vertical axis is a non-
11 axisymmetric analysis.

12 Q Did you do both types of analysis?

13 A Yes.

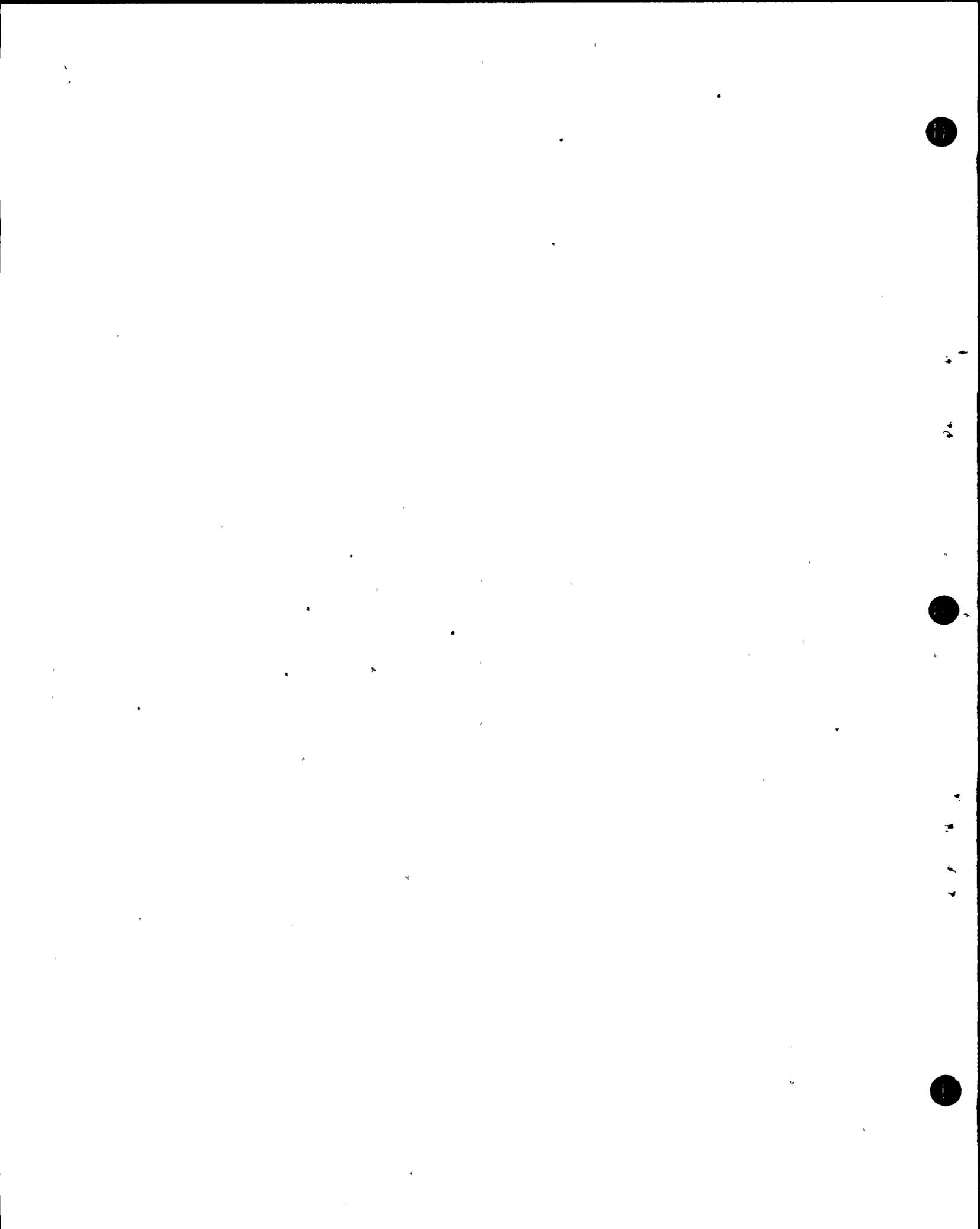
14 Q And why did you do both?

15 A Well basically this tank is -- The tanks are
16 axisymmetric, but in some, maybe all of the tanks, there is
17 an opening at one point which is significant, and we wanted
18 to check the effect of that opening, which is a non-axisymmetric
19 feature of the tank.

20 Q Which method gave more limiting stress values?

21 A I'm not sure of all the details, but around the
22 opening -- near the opening I would assume that the non-
23 axisymmetric analysis would be the governing one.

24 Q Directing your attention to page 1, Mr. Ghio, at
25 lines 22 to 24 you discuss damping. But before you did



1 the damping analysis the peak instrumental acceleration of
2 1.15g was reduced to effective acceleration of .75g, correct?

3 A (Witness Ghio) That's correct.

4 Q And was there a tau factor considered?

5 A No. Earlier on in that paragraph the testimony
6 indicates tht no tau reduction was used for these tanks.

7 Q What is your justification for 7 percent damping
8 for concrete, for the tanks, the outdoor water storage tanks?

9 A It stems from simply applying the prescription
10 of Regulatory Guide 1.61.

11 Q Dr. Blume, does Regulatory Guide 1.61 apply to
12 tanks?

13 A (Witness Blume) 1.61 refer to materials, steel
14 and concrete, and certainly it would apply to the concrete
15 in these tanks. The justification for the 7 percent is not
16 only in the Guide but it was covered by me in direct testi-
17 mony, in Reports 9 and 49C, I believe.

18 Q Well, Dr. Blume, is it your understanding that
19 Reg. Guide 1.61 applies to metal tanks?

20 A I see no reason why it shouldn't. It applies to
21 anything under extreme earthquake conditions, which these
22 tanks certainly are for this earthquake criterion.

23 Q Could you describe how damping would occur in a
24 steel tank such as these?

25 A Yes. The walls that are added to the outside of

WRB/wb4



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1 the steel walls -- I think Figure No. 3 that has been distri-
2 buted today, the revised figure, shows that there is essenti-
3 ally a concrete tank being built around and in conjunction
4 with an existing steel tank, so due to the rigidity of these
5 concrete walls they're going to act like shear walls in the
6 event of a severe earthquake, so they're going to act like
7 shear walls just like the exterior walls of the containment
8 structure or any other structure.

9 Q Is this reinforced concrete?

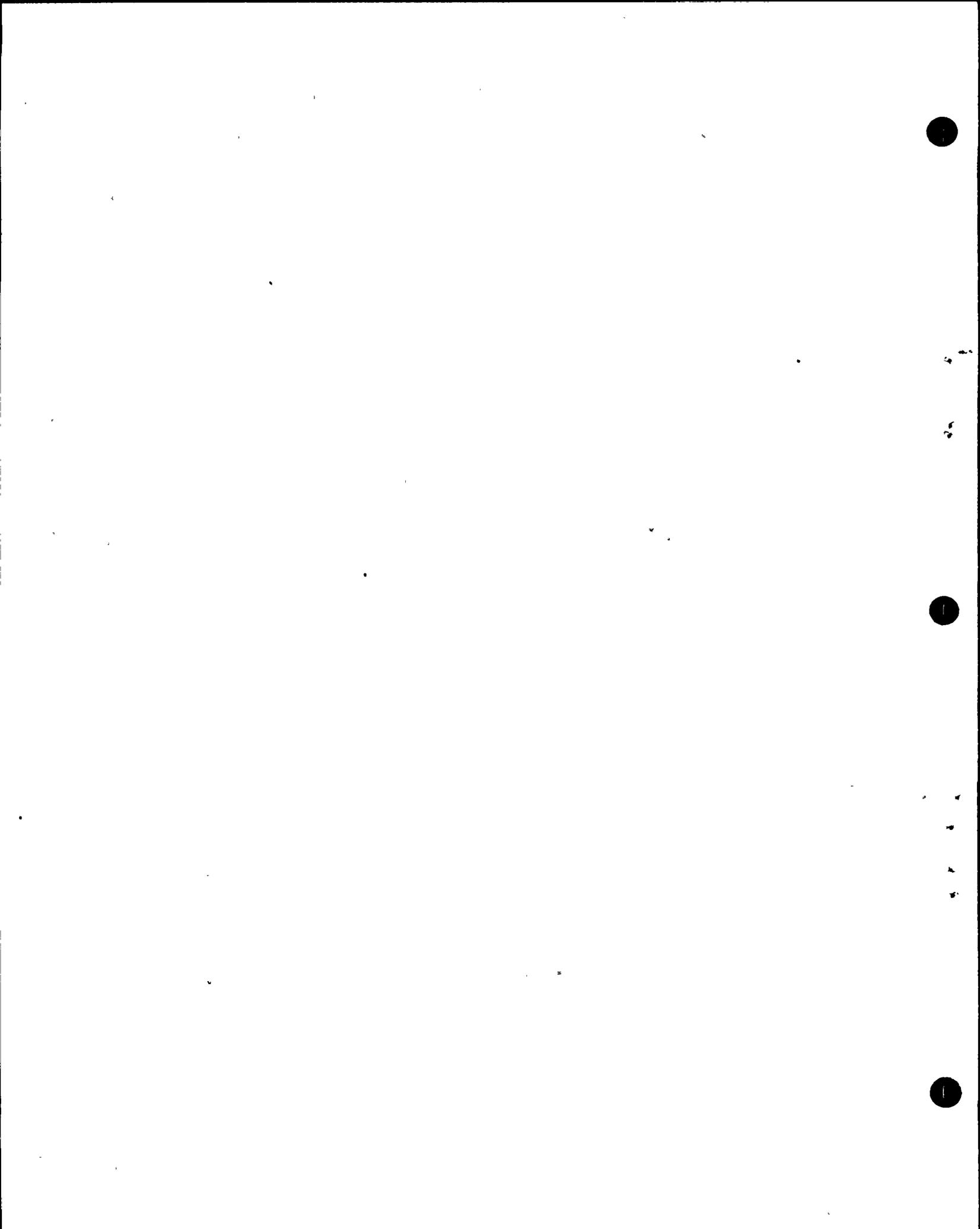
10 A Yes. It's also tied to the steel tank with
11 dowels or lugs.

12 Q How would the steel of the steel tanking experience
13 damping?

14 A How would it experience damping? Due to the
15 stress in the material, the steel and the concrete will share
16 the shear and the other forces in accordance with their
17 relative rigidities. So to the extent that they participate
18 they will feel strain and therefore they will experience
19 damping.

20 Q Mr. Ghio, what is the justification for using
21 4 percent damping for the steel with regard to the tank?

22 A (Witness Ghio) I believe Regulatory Guide 1.61
23 prescribes damping of 4 percent for welded steel structures.
24 The original tank is a welded steel structure, now encased
25 in a reinforced concrete structure.



wrb/agbl
flws WRB/wbs

1 Q Mr. Ghio, directing your attention to Page Two,
2 Lines Two and Three, did you look at the effective inter-
3 reaction between the tank and the contained fluid under
4 vertical excitation?

5 A I'll ask Dr. Jhaveri to answer that question.

6 A (Witness Jhaveri) No.

7 Q And why is that?

8 A We believed that, given the soil conditions,
9 there will not be significant interaction in the vertical
10 direction.

11 Q I'd like to refer you to Page 11-5 of the
12 Hosgri Report, Volume Three.

13 MR. NORTON: Are you sure it's Volume Three?

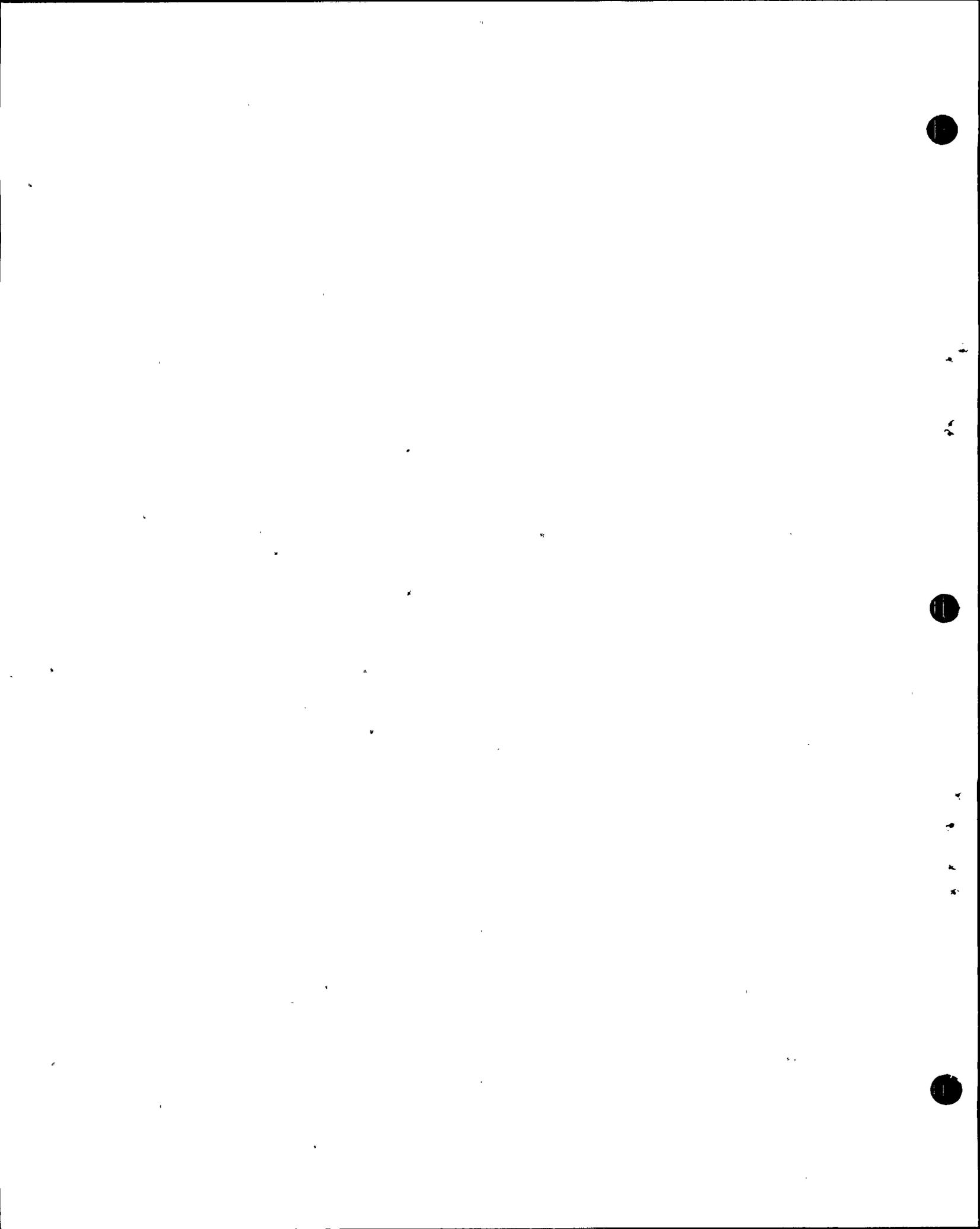
14 Dr. Jhaveri doesn't have that with him. Could
15 you read what you're referring him to, please.

16 BY MR. KRISTOVICH:

17 Q I'll read the two relevant paragraphs on 11-5
18 in Volume Three.

19 "It was found that the fundamental
20 mode of the empty refueling water storage tank
21 in the vertical direction is 0.033 second." Thus,
22 it was assumed initially that the tank and the
23 fluid act as a rigid mass during vertical motion."

24 "So effects of vertical earthquake were
25 obtained by scaling the stresses caused by gravity



wrb/agb2

1 load and hydrostatic pressure by 0.5 (2/3rds of
2 the maximum ground acceleration, that is, 2/3rds
3 times 0.75g equals 0.50g). This assumption was
4 used in the axisymmetric phase of this investi-
5 gation.

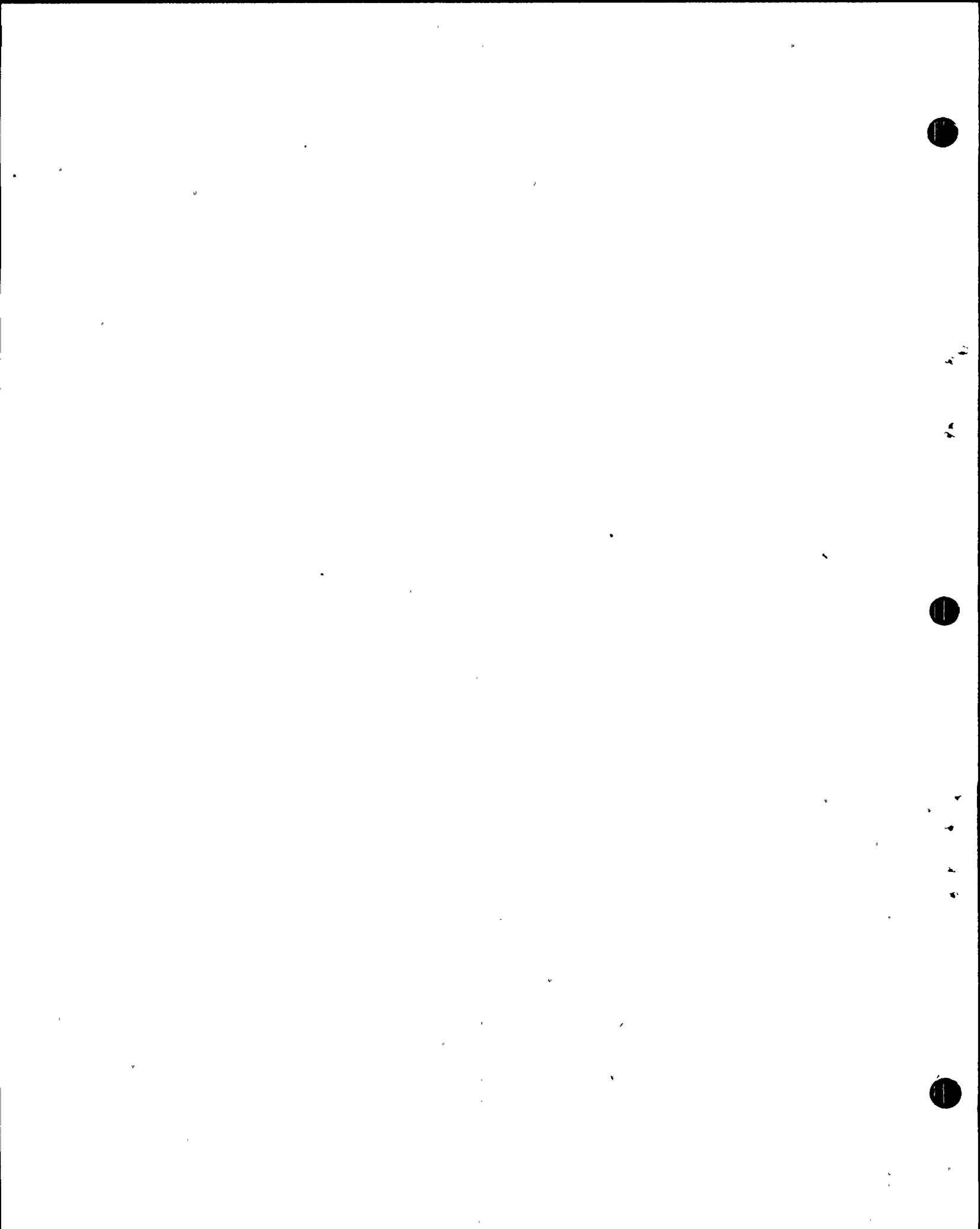
6
7 "At the present time, there is no accepted
8 procedure to analyze the fluid motion in a tank due
9 to a vertical earthquake. To consider the possi-
10 bility that the fluid may not act as a rigid mass
11 during vertical motion, an amplification factor
12 of 2.0, that is, the acceleration at zero period
13 of 0.5g is amplified to a value of 1.0g, was used
14 in the non-axisymmetric phase of this investi-
15 gation. Effects of vertical earthquake were
16 than obtained by scaling the sum of the dead load
17 and the hydrostatic pressure stresses by 1.0."

18 Does that mean that the effects of a vertical
19 earthquake were analyzed?

20 A (Witness Jhaveri) These paragraphs describe the
21 way we considered the effect in the vertical direction,
22 amplification in the vertical direction.

23 Q I thought I understood you to say that you did
24 not look at the effect of interaction between the tank and
25 the contained fluid under vertical excitation.

A I'm sorry, I understood your question to mean



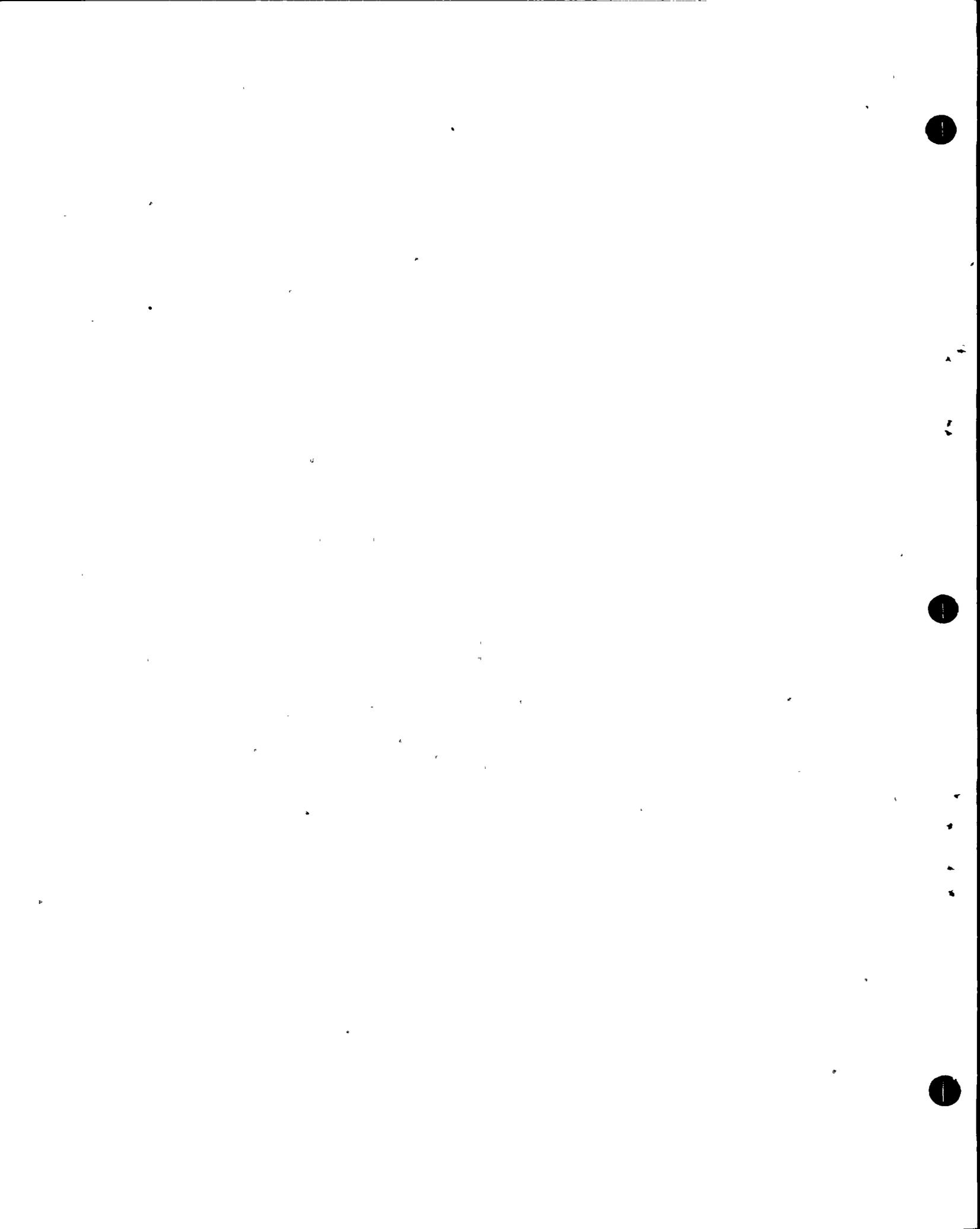
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interaction, soil-structure interaction. I stand corrected.

flws

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C9

1

Q So then you did look at the interaction between
the tank and the containment for the vertical excitation?

2

A In the approximate manner described in that
paragraph.

3

4

5

Q What was the basis of this analysis?

6

A Judgment. Literature search.

7

A (Witness Blume) The dynamic amplification factor
of 2 is quite a generous value for such a situation, using
liquid. I think it was a conservative assumption based upon
judgment which, in turn, is based upon the study of a great
many -- I'd say literally hundreds -- of response spectra,
and getting average dynamic amplification factors.

8

9

10

11

12

13

Q Is there an NRC Regulatory Guide for this?

14

A I don't think so. Not to my knowledge.

15

Q Is this in the Standard Review Plan?

16

A I don't know, personally.

C9

17

Q Mr. Ghio, directing your attention to page 3,
lines 4 and 5, you state:

18

19

"In the Hogri analysis the currently accepted
methodology was utilized."

20

21

What currently accepted methodology were you
referring to?

22

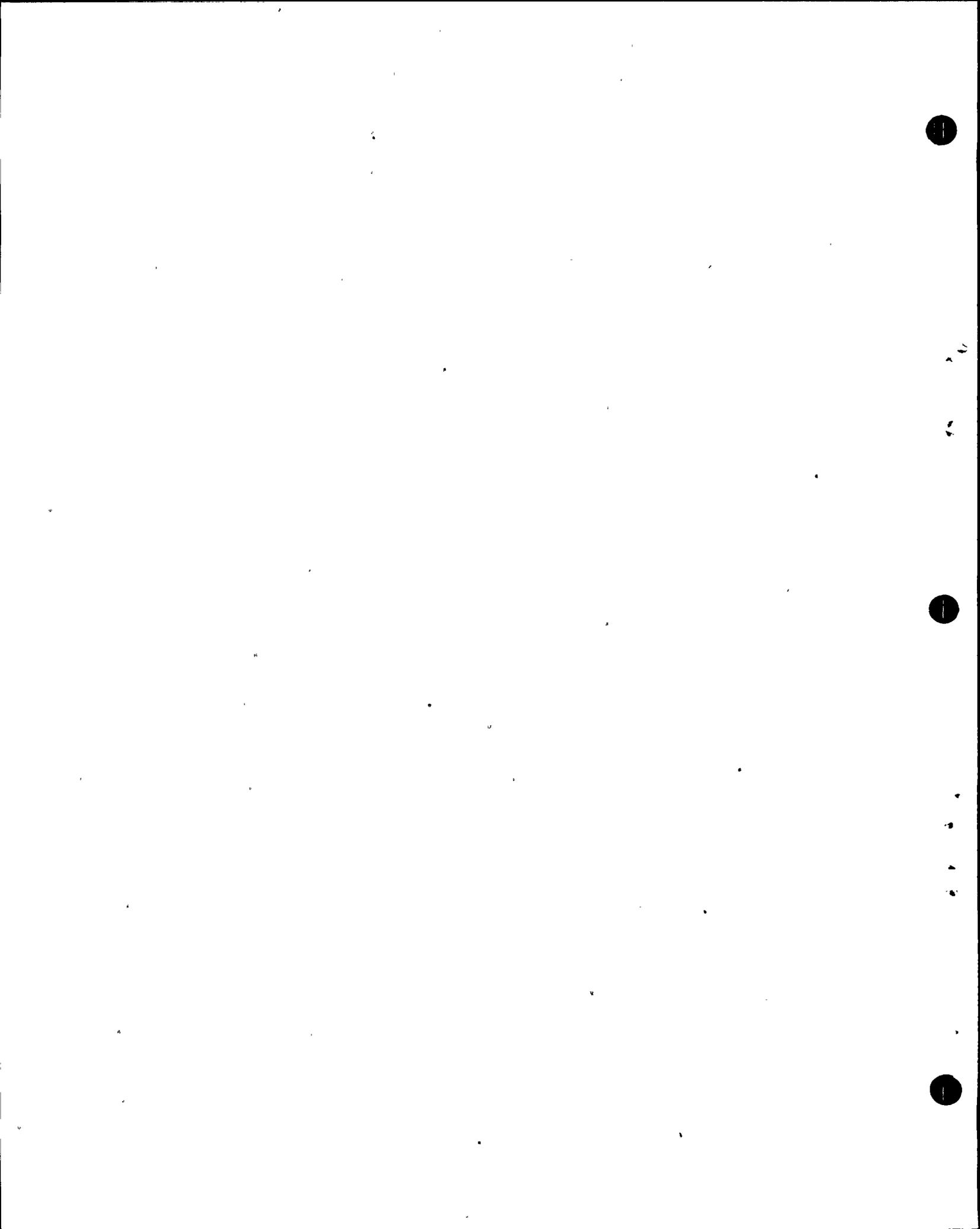
23

A (Witness Ghio) I'll have Dr. Jhaveri respond to
that.

24

25

A (Witness Jhaveri) It's described in a reference



1 in that Hosgri report you cited, reference number 7, I think.

2 Q I'm sorry, I didn't hear. Reference number --

3 A Reference number 7. Valetsos and Yang are the
4 authors.

5 Q Well, reference number 7 . . .okay, I believe
6 you're referring to reference number 6.

7 A Okay.

8 A (Witness Blume) We don't have a copy.

9 Q Right, that's Valetsos and Yang.

10 A (Witness Jhavari) Okay.

11 Q Still on page 3, lines 7 and 8, you state that
12 the use of current methodology led to major modifications,
13 as well as a higher seismic input.

14 Does that mean that the earlier methodology would
15 not have required major modifications?

16 A Earlier methodology?

17 Q Yes.

18 A I'm not sure. I don't recall.

19 Q Well, could you explain the difference between
20 the current methodology and the earlier methodology?

21 A Yes. In the computation of impulsive pressures
22 exerted by the fluid on the tank, the earlier methodology
23 used the assumption that the tank would move as a rigid
24 body, laterally.

25 The current methodology does not make that



wel 3

1 assumption. It assumes a deformed shape for the tank and
2 computes the pressures based on that deformed shape.

3 Q And why does it not make that assumption?

4 A What was that again?

5 Q Why does it not make the assumption that it will
6 move as a rigid body?

7 A It was found that that assumption is not valid,
8 the assumption of rigidity is not valid.

9 Q Referring to page 3, line 23 through page 4, line
10 2, how were the allowable stresses for reinforced concrete
11 structural members determined?

12 A I'd ask Mr. Yokoyama to respond to that.

13 A (Witness Yokoyama) The same as the other
14 structures we've been using, in this particular case ACI.

15 Q And for structural steel?

16 A For structural steel we used ASME pressure vessel
17 code.

18 Q Were average actual strengths used?

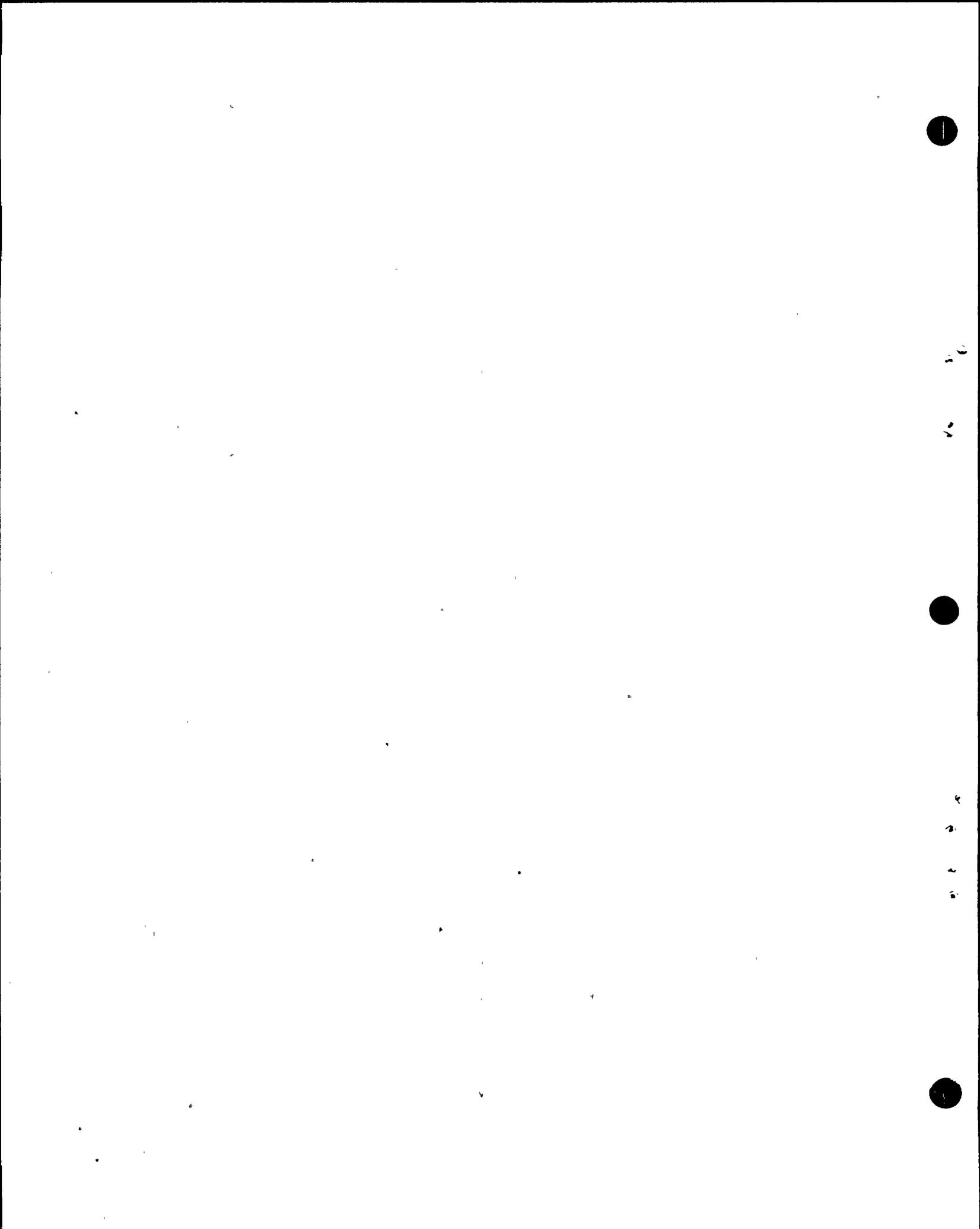
19 A Yes.

20 Q For both concrete and steel?

21 A Concrete is new. That has -- we had used the
22 specified minimum strength.

23 Q And what is that?

24 A 4000 psi for the 12-inch thick portion. I guess
25 it's the entire portion. Everything but the concrete fill



1 I think is 4000. Yes, 4000 minimum specified.

2 Steel minimum specified is 60 KSI.

3 A (Witness Rocha) The concrete fill is 3000, only
4 for that portion.

5 A (Witness Blume) I think to avoid confusion here,
6 it has to be noted that they are talking now about new
7 materials, new concrete and new reinforcing steel, for which
8 they used the specified values and usual reductions, as
9 contrasted to what we've been talking about all morning as
10 existing materials.

11 Q In the ASME code where does it explain how actual
12 minimums are used, actual material values?

13 A (Witness Yokoyama) We used what the ASME standard
14 calls design stress intensity, and instead of using -- I
15 think Dr. Jhaveri can back me up -- I think we used, instead
16 of 1.2 we used 1.5. I think that was in the report, the
17 Hosgri report.

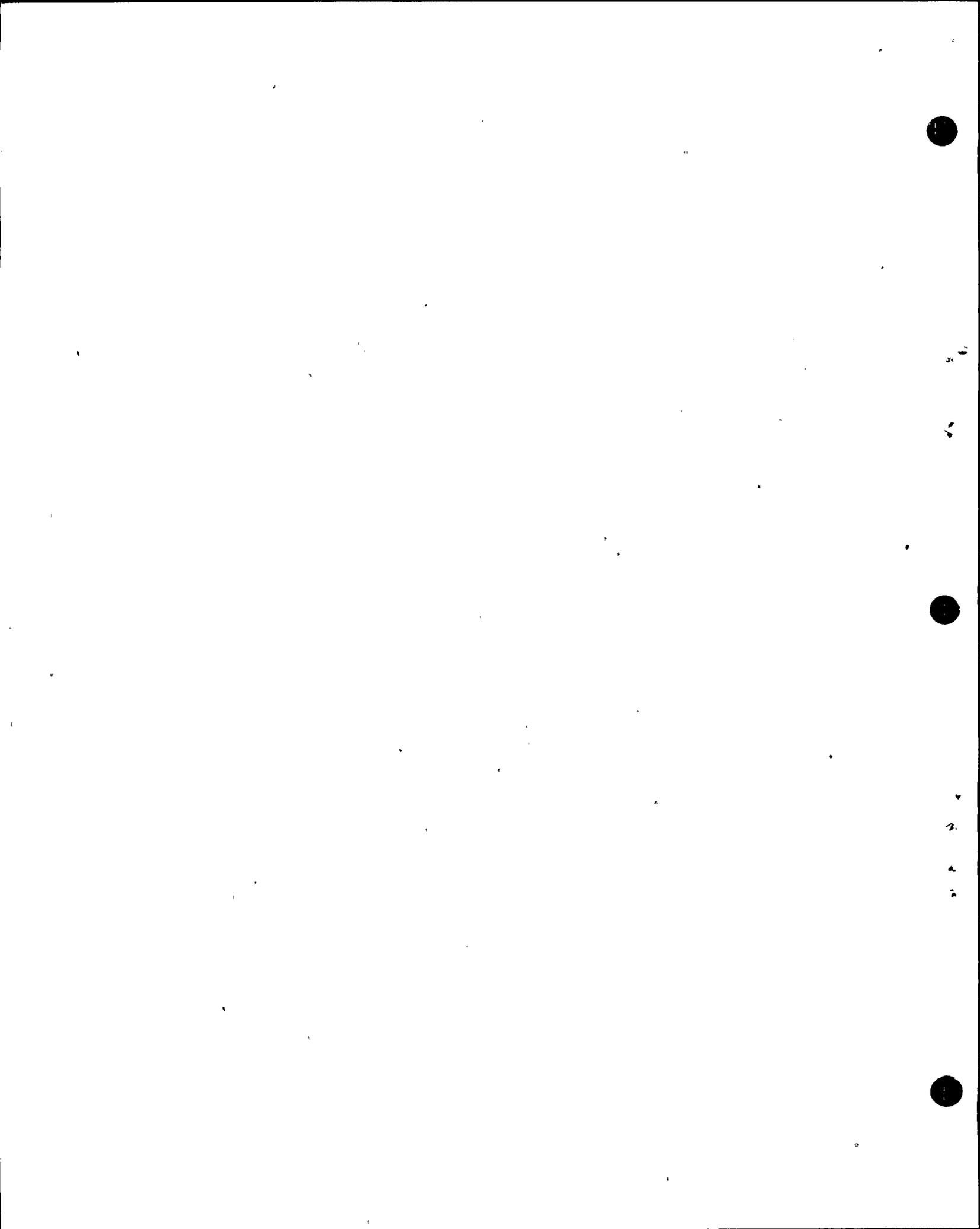
18 A (Witness Jhaveri) I think the question, as I
19 understood it, was where does the ASME code specify using
20 actual material strength.

21 A (Witness Yokoyama) Oh, I'm sorry. Was that the
22 question?

23 Q That's correct.

24 A (Witness Yokoyama) I do not know.

25 Q Does any member of the panel know?



vel 5

1 MR. NORTON: Excuse me. I'm going to have to
2 object and ask now, is this question going to the question
3 of specifications for concrete not poured, or does this
4 question go to concrete that has been poured in a structure
5 that exists?

6 MR. KRISTOVICH: We're talking about steel.

7 MR. NORTON: Or steel. Is this talking about
8 steel as it exists, or steel that's to be specified?

9 MR. KRISTOVICH: I'm talking about the steel the
10 panel members were talking about.

11 MR. NORTON: Well, I'm not clear what you're
12 referring to.

13 Are you referring to the tank itself that's
14 already there? Is that what you're talking about?

15 MR. KRISTOVICH: Yes.

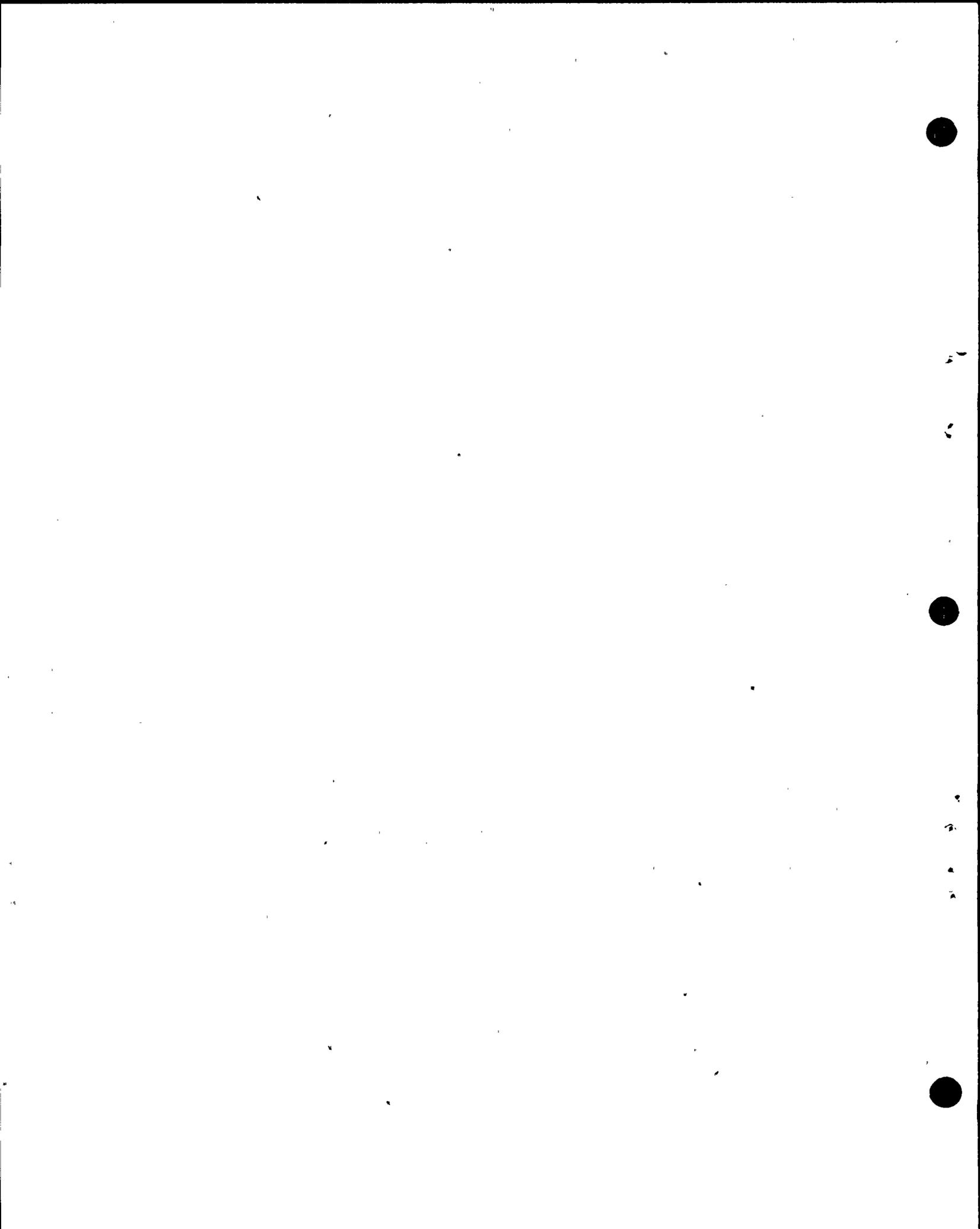
16 MR. NORTON: All right.

17 MRS. BOWERS: Do you withdraw your objection?

18 MR. NORTON: Well, I think the question ought to
19 be rephrased in order that the panel knows what the question
20 is. It ought to be rephrased to include what he's talking
21 about, the specific item he's talking about, as opposed to
22 the question as it was originally phrased, which could apply
23 to anything.

24 BY MR. KRISTOVICH:

25 Q Were actual material values used in the ASME . . .



1 evaluation of the steel tank?

2 A (Witness Yokoyama) The average values, test values
3 have been used as in all other existing structures, as far
4 as I know.

5 Q Is there anywhere in the ASME code that describes
6 how to use actual material values?

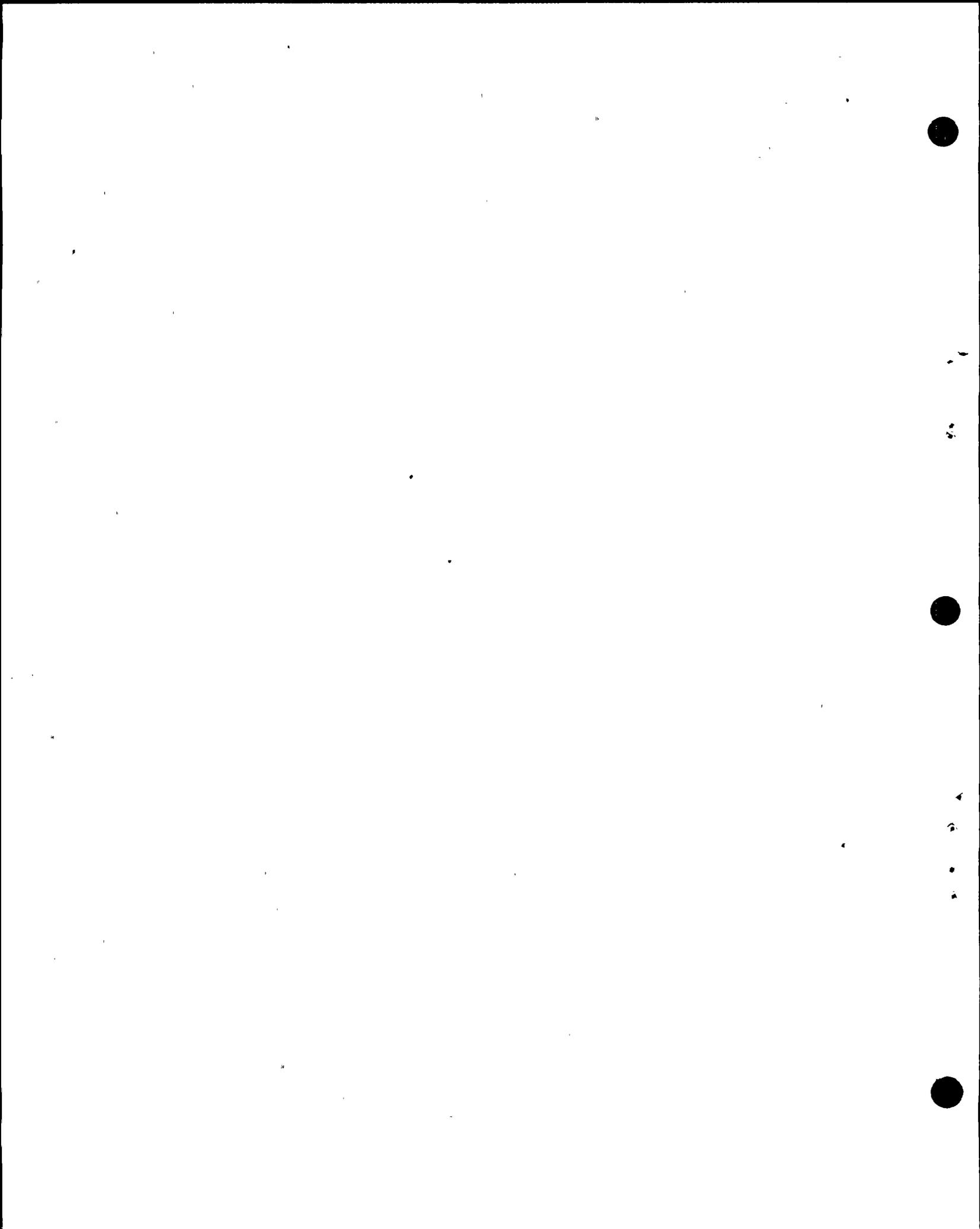
7 A I'm not that familiar with it.

8 A (Witness Blume) I think the situation is just
9 like we were talking about this morning with these other
10 codes, that they do not contemplate redoing or adding to
11 structures. Here we are wrapping a new concrete tank
12 around an existing steel tank. This would certainly not be
13 contemplated in the ASME code.

14 So I think the situation is, again, this basic
15 one that we know what the steel is by tests, and there would
16 be no valid reason in the world to use a value that is much
17 lower just because it's in the specification.

18 A (Witness Rocha) I want to emphasize the use of
19 the ASME code allowable stresses at the design of the original
20 tanks. It was chosen because it has lower allowables than
21 say American Waterworks Association, which is the code
22 normally used for water tanks. But being this is a nuclear
23 site we decided we'd choose the lower allowable values in
24 the design of the original tank.

25 Now, the structure has been modified in order to



1 check the effects on that assisting metal there, and we are
2 using the actual test values to verify that those values are
3 not exceeded.

4 Q You previously mentioned a factor of 1.2 and a
5 factor of 1.5. What exactly were you referring to?

6 A (Witness Yokoyama) In the ASME pressure vessel
7 code for what they consider code earthquake forces or wind
8 forces. They use a factor of 1.2 times the design intensity,
9 and instead of the 1.2 we have used 1.5 for the 7.5 Bosgri
10 earthquake. Is that correct?

11 A (Witness Jhaveri) Yes. We have used a design
12 stress intensity of 1.5. 1.5 times the --

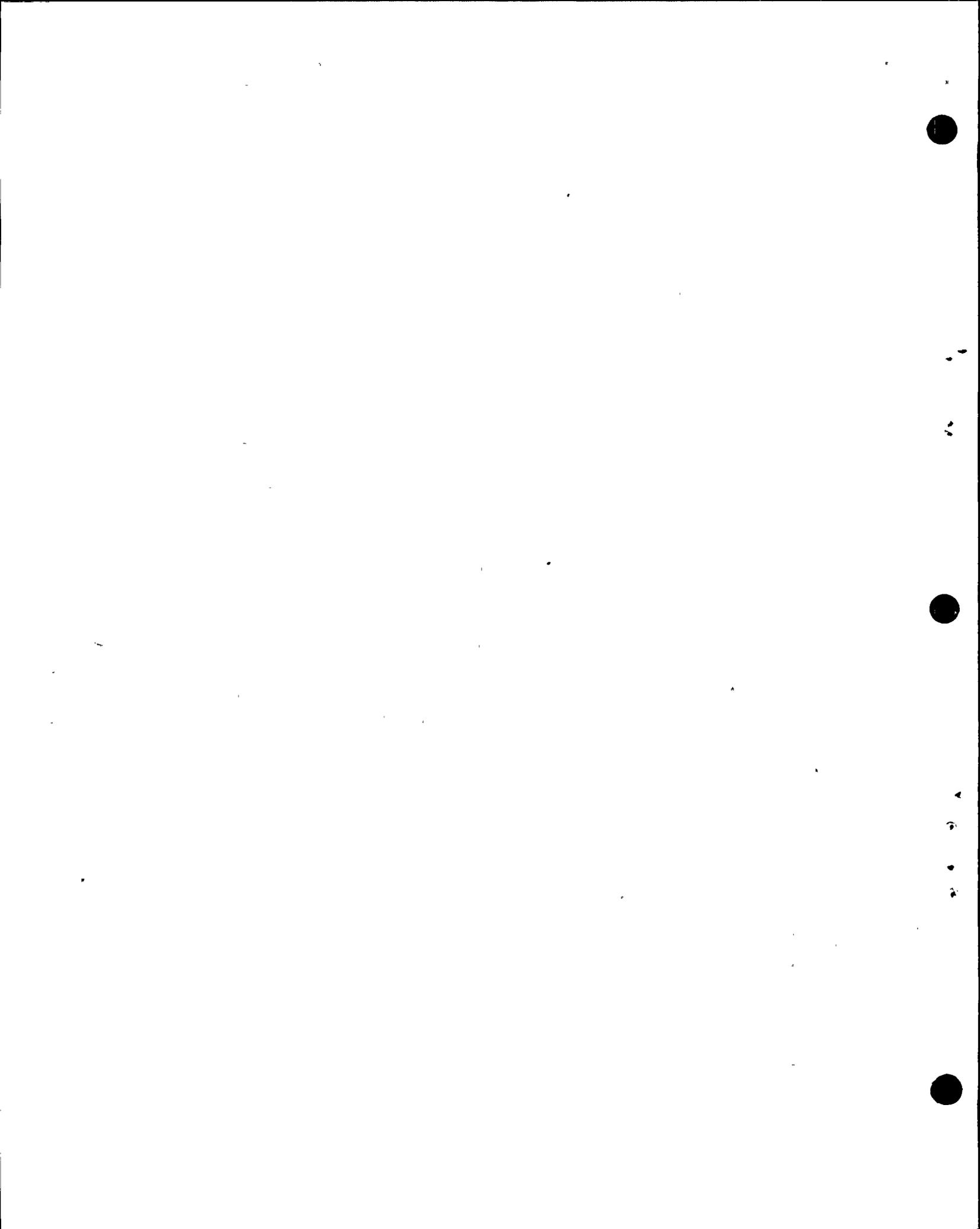
13 A (Witness Yokoyama) -- design intensity specified
14 in the ASME pressure vessel code.

15 The design intensities are in that code for various
16 stainless steel materials, whatever, with the various yield
17 stresses. And those are the ones that we used -- I think I
18 recollect that there was one that had a minimum yield strength
19 of 35 KSI, and it gave you some value. And for the 25 KSI
20 yield strength they gave you another value.

21 And those are the values we used. If our in-place
22 steel was 35 KSI, that's the number we used.

23 Q Well, why don't you use 1.5 rather than 1.2?

24 A Because of the great magnitude of this earthquake.
25 The earthquake they have in the ASME pressure vessel code is



wel 8

1 for the building design code type of earthquake.

2 Q Directing your attention to Tables 1, 3 and 4 --

3 MR. NORTON: Can we direct our attention to just
4 one at a time?

5 MR. KRISTOVICH: Yes.

6 BY MR. KRISTOVICH:

7 Q For each of these tables -- you can take the time
8 to look at them -- each of the tables has a footnote at the
9 bottom which says:

10 "See Table 5."

11 MR. NORTON: Those should all read now, I take
12 it, "See Table 6."

13 WITNESS JHAVERI: No, it is Table 5 it is
14 referring to.

15 MR. NORTON: Oh, it is the new Table 5 that it's
16 referring to? All right.

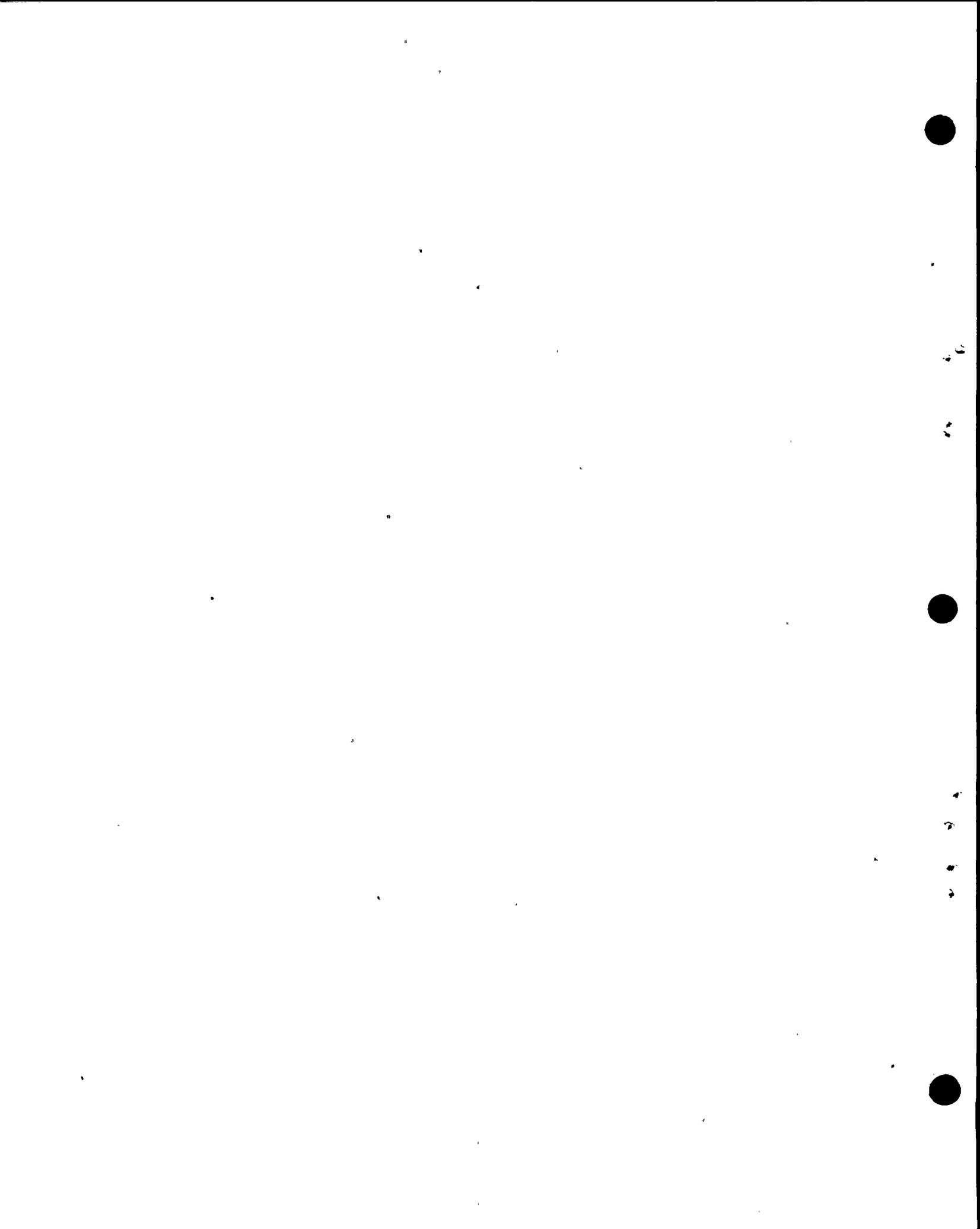
17 BY MR. KRISTOVICH:

18 Q On Table 1, the footnote following the asterisk
19 states:

20 "On the basis of analysis of a non-axisymmetric
21 model of the refueling tank using the SAP-4 computer program,
22 the plate will be reinforced to reduce stresses to be within
23 allowable stress intensities."

24 And then it says: "See Table 5."

25 Could one of the panel members explain why we



wel 9

1 are seeing Table 5, or how Table 5 ties in with this?

2 A (Witness Yokoyama) Do you want me to answer that?

3 On Table 5 you'll notice that there's an asterisk -- I don't

4 have the Table here. . .

5 (Document handed to the witness.)

6 In the non-axisymmetric model you'll notice that

7 there is one --

8 Q Are we on Table 5 now?

9 A Yes. There is one that asterisked, 26.56. That's

10 the fourth column from the left. That is higher than the

11 allowable.

12 Q Wait, there were two numbers that have asterisks,

13 right?

14 A Yes. Well, one of them is above the allowable

15 stress, and the other is still within allowable. However,

16 in the field you just wouldn't reinforce that little portion

17 there, you would -- it would be impractical just to reinforce

18 that one little area. So if the area we're talking about

19 here is the opening, concrete opening around the tank, in

20 the tank shell. So if we're going to fix something, we're

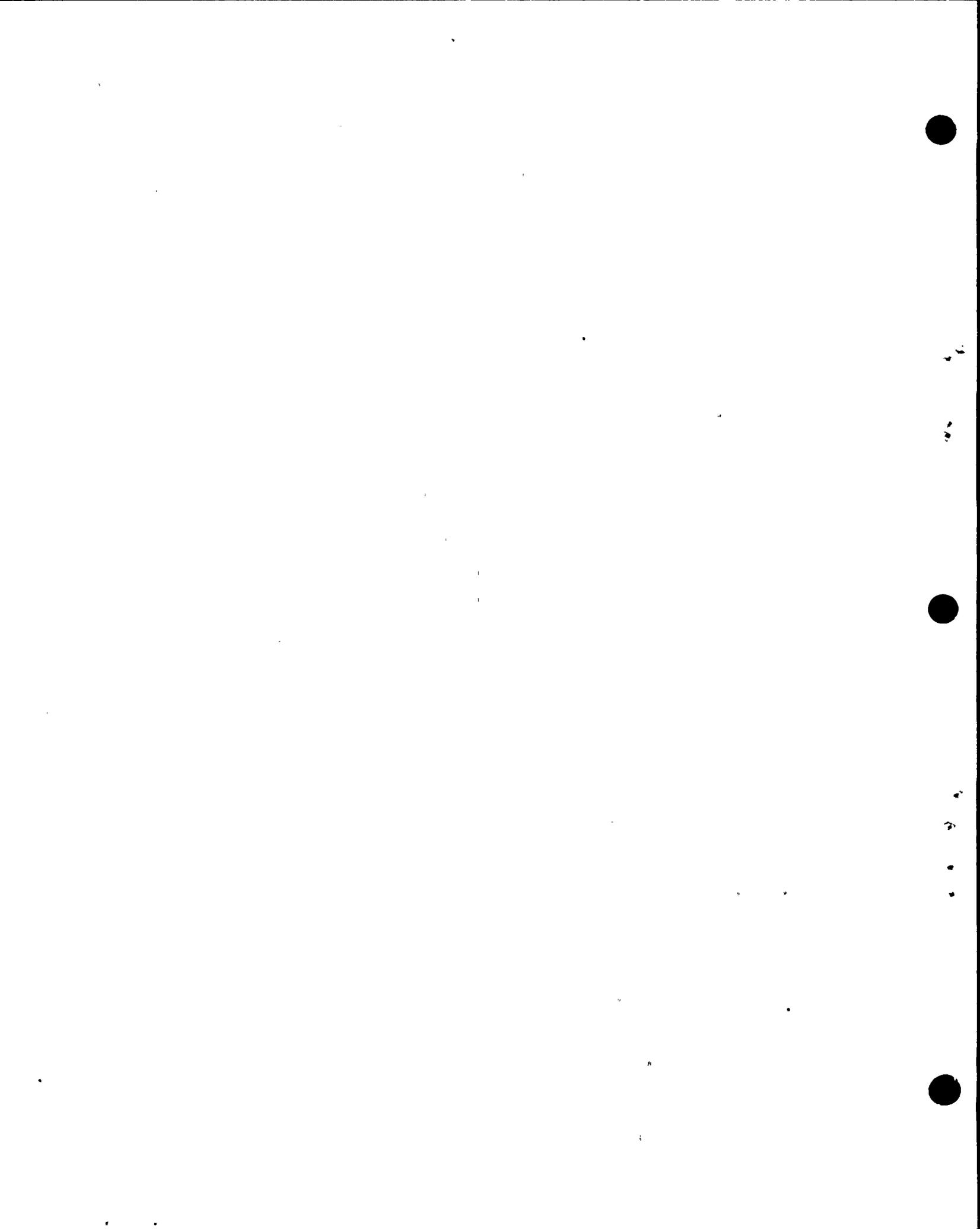
21 not just going to fix that one little area. We decide to

22 fix everything in the area within the opening in the concrete

23 shell. The steel within the opening of this concrete shell

24 has been reinforced.

25 Q So these are the numbers before the modification?



1 A That's right. That number is before the modifica-
2 tion.

3 Q Do you know what the numbers after the modification
4 will be?

5 A They're much less.

6 Q How much less?

7 A I'd have to look that up. I don't have the
8 calculations here.

9 What we're talking about right now, what is that,
10 1.56 over 26, and anything we do is going to be within
11 allowable, practically. Anything practicable we do will be
12 within allowable.

13 Q Well, what value is this table in analyzing the
14 modified tank?

15 A It pinpoints the part that we would have to
16 reinforce, to be within the acceptable criteria.

17 A (Witness Rocha) I want to emphasize that even
18 though the use of the values there are slightly higher than
19 the allowable, they do not exceed the yield stress of that
20 metal. We have chosen to modify the area to bring those
21 areas within allowable, as specified by the ASME code.

22 Q Mr. Ghio, did you do an OBE analysis of the
23 reactor water storage tanks?

24 A (Witness Ghio) Yes. An OBE analysis was performed.

25 Q And where was the OBE analysis limiting?



1 A I don't believe it was limiting anywhere in the
2 original tanks.

3 Q Was a vertical dynamic analysis made for the CBS?

4 A I'll ask Mr. Rocha to answer that.

5 A (Witness Rocha) We took just two-thirds of the
6 horizontal response, and used that as a vertical response.

7 Q Two-thirds of .2 g?

8 A That's correct.

9 Q Any why did you do that?

10 A Eight years ago when this was designed, that was
11 the accepted methodology.

12 Q Would it be acceptable today?

13 A I believe so.

14 Q Why?

15 A Well, it's a sound methodology. More new methods
16 are being found to analyze tanks that are more sophisticated,
17 and these methods have been put into practice as they are
18 developed.

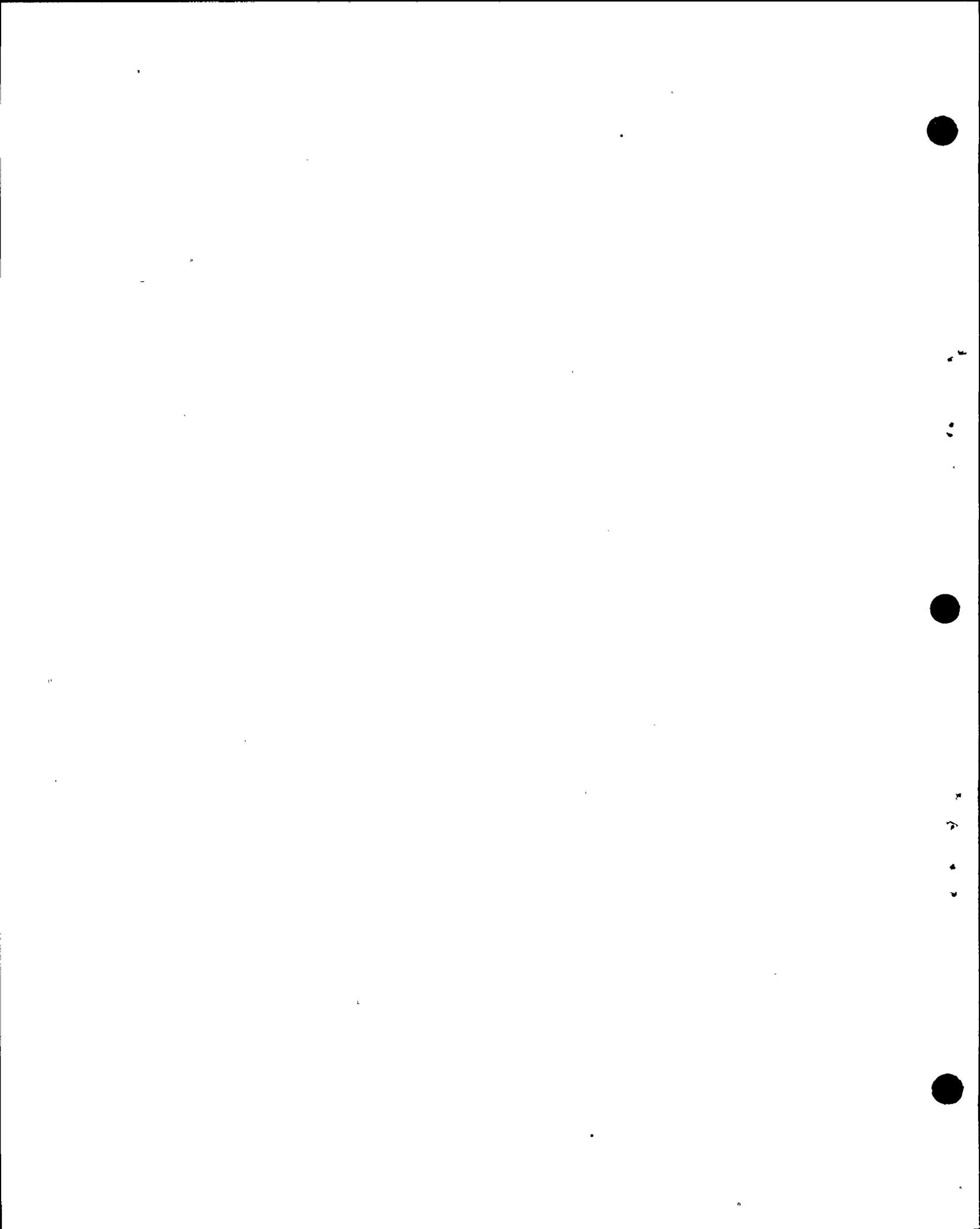
19 Q For the SSE did you use a constant vertical?

20 A I believe so, yes.

21 Q Okay.

22 Turning to Table 6, in the last column under
23 Shear KIP/foot, then under that the last column is Design
24 Strength you made some corrections to the figures there.

25 What is the basis for those corrections?



1 A (Witness Jhaveri) According to the code the design
2 strength for shear is governed by a formula that was described
3 by Mr. Lang earlier.

4 The initial figures were based on that, but there
5 is also a limiting value to that expression, and that is
6 10 square root of F sub C prime, and we hadn't checked against
7 that. The new values are 10 square root of F sub C prime.

8 Q And when did you discover that you hadn't done
9 that?

10 A I'll ask Mr. Yokoyama to --

11 A (Witness Yokoyama) When Dr. Jhaveri turned his in,
12 he had the wrong sheet. That was about two months ago.

13 MR. NORTON: I'm sorry, I didn't understand that
14 answer. Would you repeat it, please? Or rephrase it? I
15 didn't follow it..

16 MR. KRISTOVICH: The question was: When did you
17 discover that you had the wrong figures?

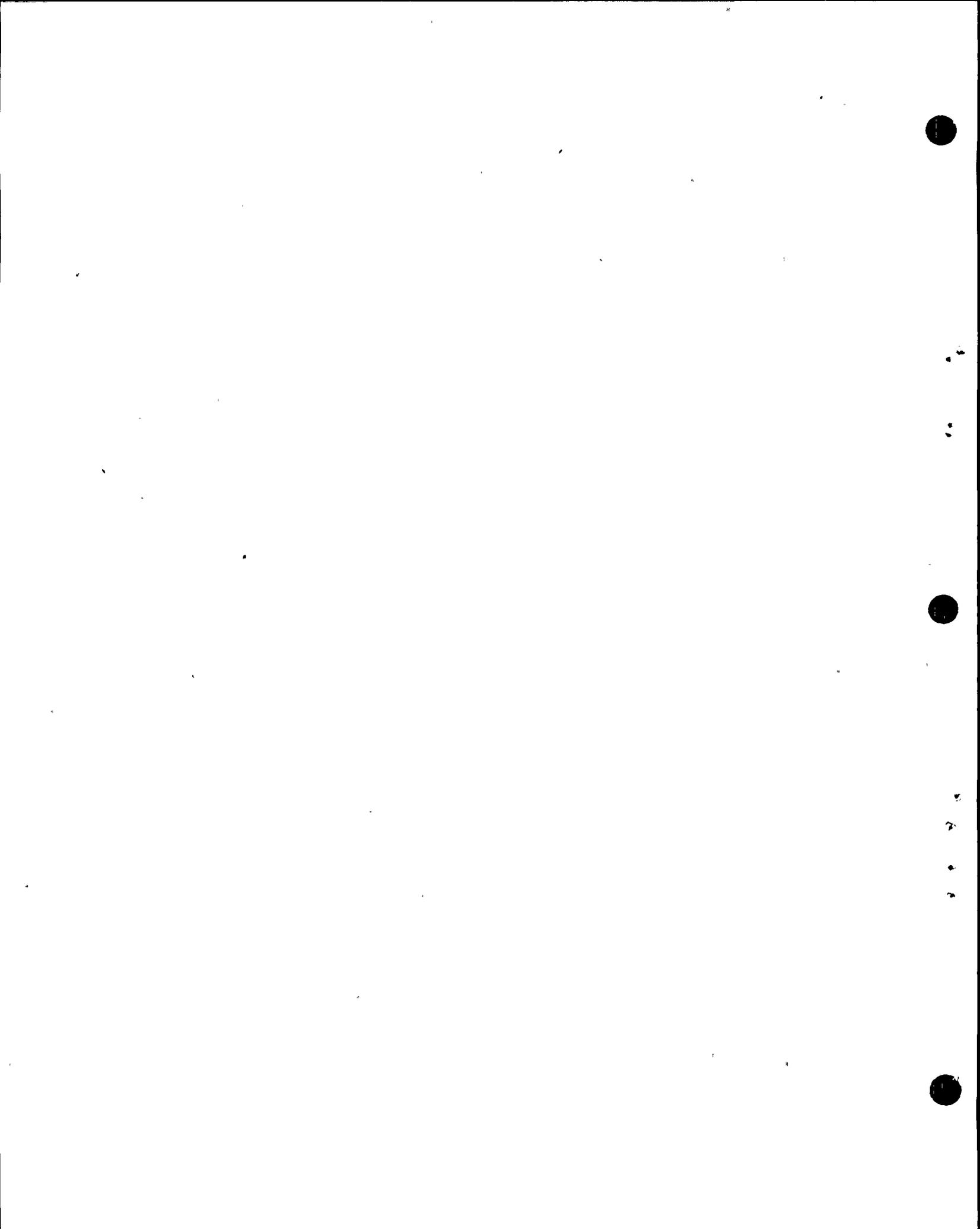
18 WITNESS YOKOYAMA: And the answer was that Dr.
19 Jhaveri had the wrong table, and we did have those numbers
20 changed early in November.

21 MR. NORTON: Yes, but I don't know that that's an
22 answer to the question.

23 I'm not clear.

24 BY MR. KRISTOVICH:

25 Q Well, when did you discover that you had not



1 looked at the most limiting condition?

2 MR. NORTON: Object. That assumes a fact not in
3 evidence.

4 MRS. BOWERS: Do you want to respond to the
5 objection?

6 MR. KRISTOVICH: Well, I thought Dr. Jhaveri
7 testified that they had done an original calculation, and
8 then later did a new calculation to arrive at the second
9 figures, which we added to the sheets today.

10 And I'm asking, when did they do the second
11 calculations?

12 MR. NORTON: I have no objection to that question.

13 WITNESS BLUME: Let me see if I --

14 MR. NORTON: Excuse me, Dr. Blume, I think we have
15 to get a ruling from the Board.

16 WITNESS BLUME: Oh, pardon me.

17 MRS. BOWERS: I think the question was rephrased
18 and you had no objection to the rephrased question.

19 MR. NORTON: That's correct.

20 MRS. BOWERS: So the witnesses can proceed on the
21 rephrased question.

22 WITNESS BLUME: I'll try to clarify it, as I
23 understand the question and the situation.

24 Apparently in November it was discovered that
25 one of the limiting criteria had not been taken into account.



10



10



wel 14

1 It was not a calculation as such for stresses. It was a
2 matter of determining all of the limiting criteria.

3 Apparently this was corrected in November, but
4 due to some accident with the tons of paper we've been
5 handling, I guess Dr. Jhaveri didn't pick up the right piece
6 of paper when this document was turned in.

7 So these corrections that were just made were
8 discovered by him fairly recently, but they actually were
9 corrected two or more months ago.

10 Does that help any?

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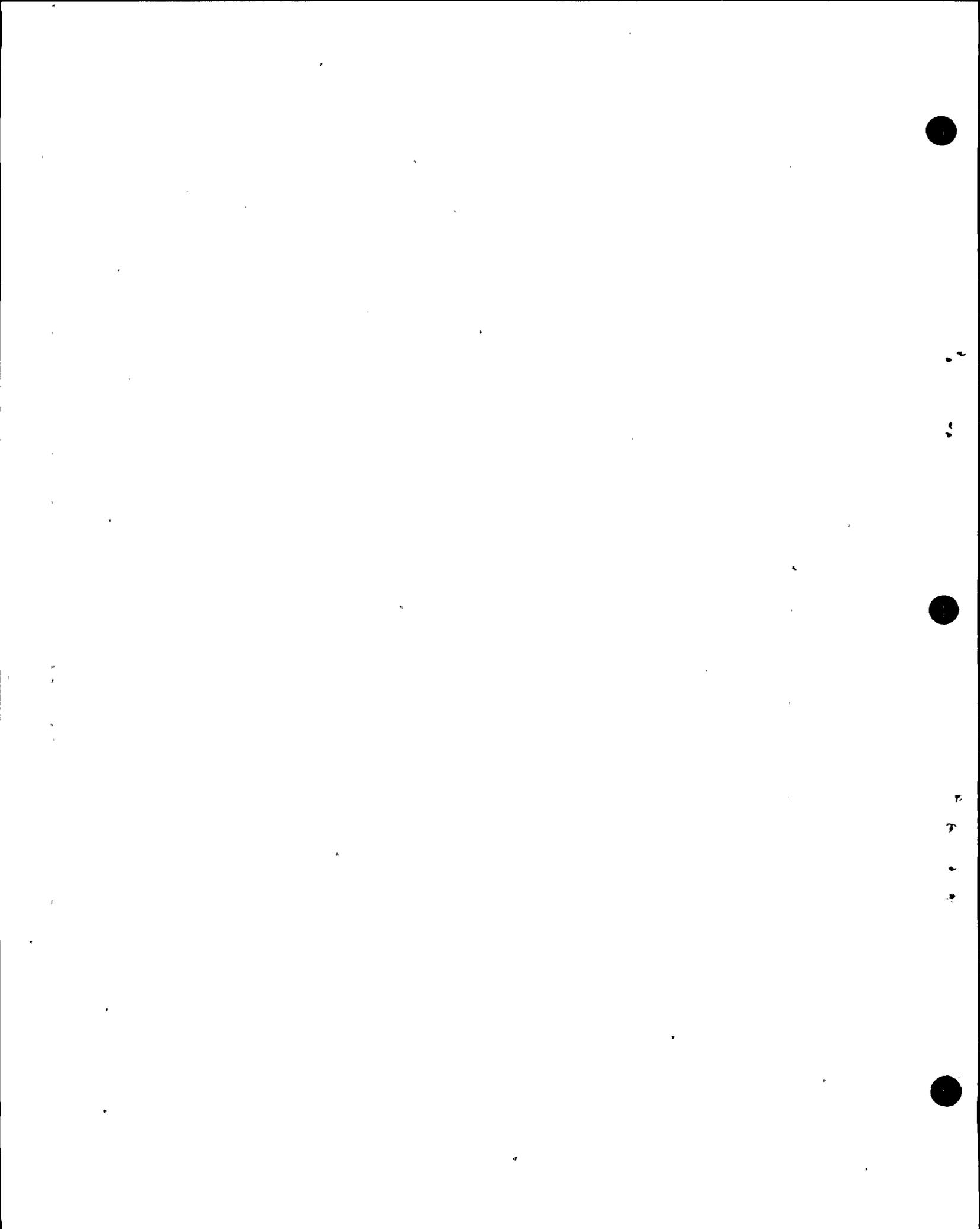
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10 mpbl

1 MR. NORTON: Well, I think the problem is the
2 testimony of November 15th, and I gather what you're saying
3 is the error was discovered before then, but another error was
4 made and the wrong table was submitted.

5 Does that sum it up?

6 WITNESS JHAVERI: That's correct.

7 WITNESS ROCHA: I would like to correct my
8 previous testimony on the accelerations that you asked
9 me.

10 50-percent amplification due to the design
11 earthquake and the double design earthquake would take into
12 consideration that those things were sitting in their own
13 field as built.

14 BY MR. KRISTOVICH:

15 Q: Is that for the SSE analysis or for the OBE
16 analysis?

17 A: (Witness Rocha) Both.

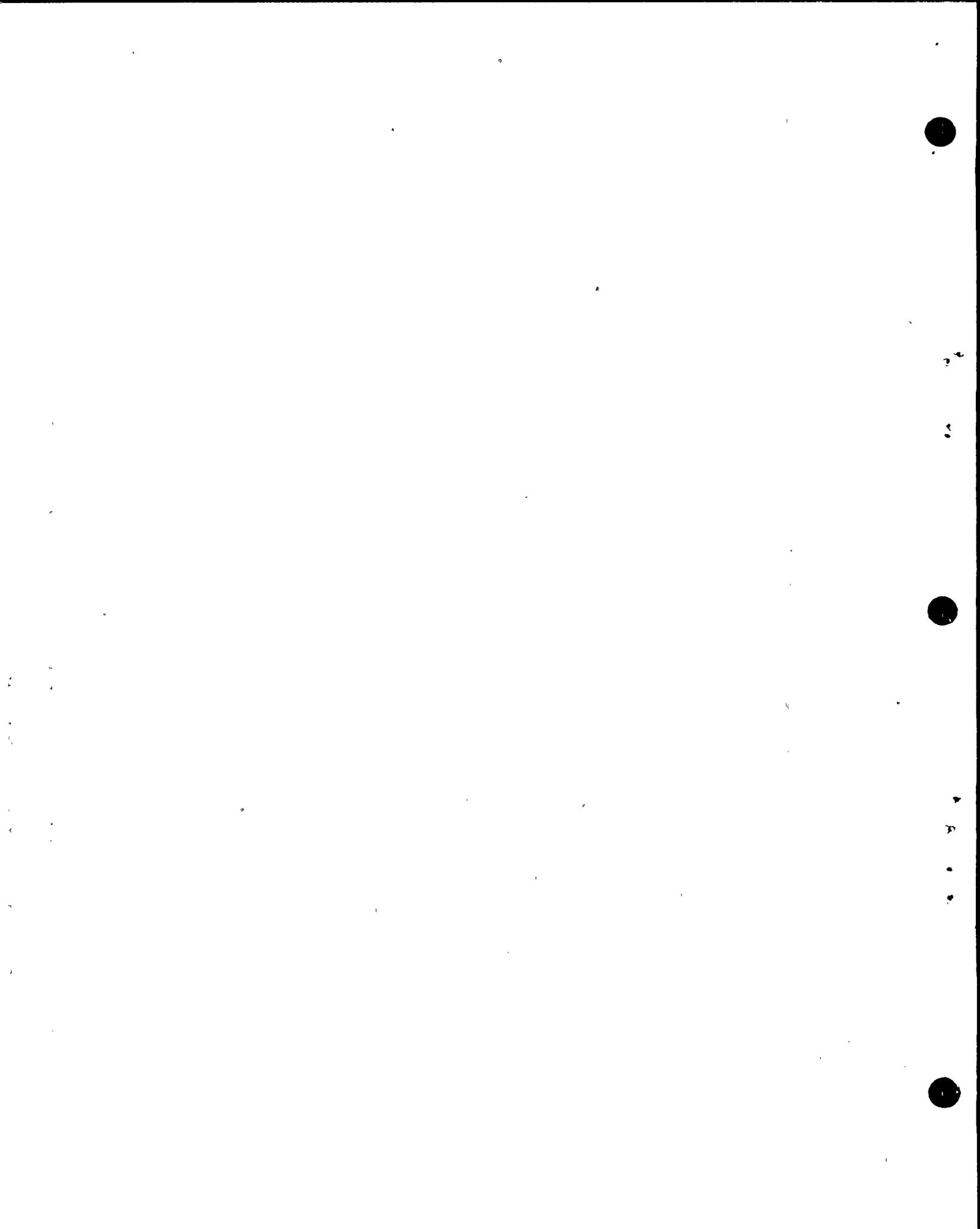
18 MR. KRISTOVICH: No further questions.

19 MRS. BOWERS: Mr. Ketchen?

20 MR. KETCHEN: Mrs. Bowers, I know it's early,
21 but may we have about five or ten minutes to discuss -- I'd
22 like to discuss something with my advisors before I take up
23 cross-examination.

24 MRS. BOWERS: Well, let's take ten minutes.

25 After this we're going to leave for lunch at



mpb2

1

quarter to twelve to try to get ahead of the crowd.

2

(Laughter.)

3

(Recess.)

4

MRS. BOWERS: Do you want to discuss something before we begin?

5

6

MR. NORTON: Yes.

7

I just found out -- I guess the Board received its packet at the same time the rest of us did in the mail, which is the Joint Intervenors' Request for Directed Certification, which is approximately -- well, I haven't read it all, but it looks to be about 20-some pages, 20, 21, 22 pages in length with attachments.

10

11

12

13

We just found out that we have been directed to respond by the 15th of December --

14

15

(laughter.)

16

DR. MARTIN: Of which year?

17

MR. NORTON: -- by the Appeal Board.

18

DR. MARTIN: Well, that gives you plenty of time.

19

MR. NORTON: Sure.

20

(Laughter.)

21

MR. NORTON: Can I quote you in my response.

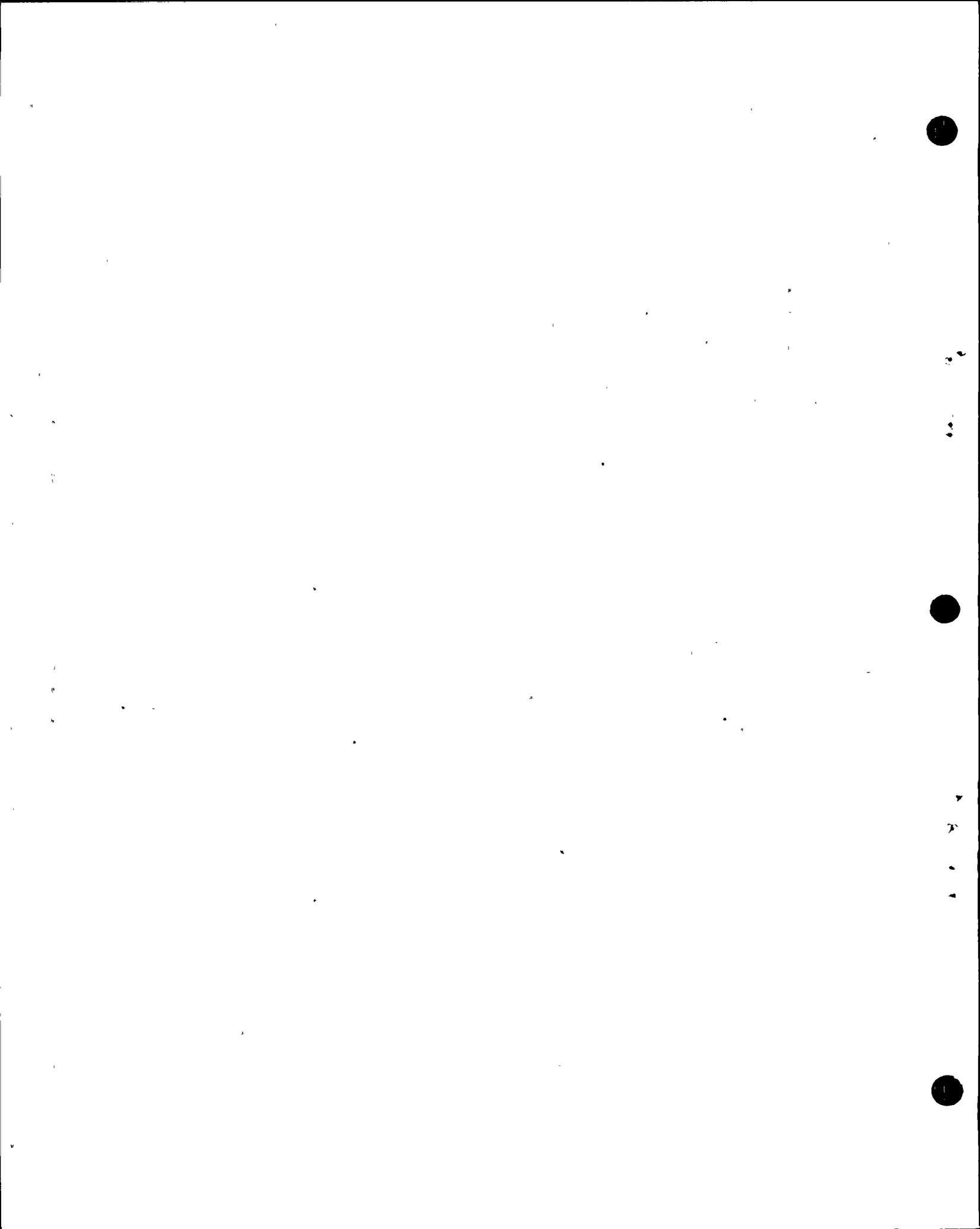
22

And if we're going to have sessions on Saturday and Sunday, today is the 4th, that's 11 days. This weekend is the only weekend we have to work on it. And we don't have the library facilities and so on here that we would have in our

23

24

25



mpb3

1 offices, so we have a problem in getting out a response.

2 MRS. BOWERS: Are you serious that somehow you
3 learned December 15th--

4 MR. NORTON: Did I say December 15th? Excuse me,
5 I meant January 15th.

6 MRS. BOWERS: Well, that's why Dr. Martin said
7 you had so much time.

8 DR. MARTIN: You had almost a year.

9 MR. NORTON: January 15th, I'm sorry, I misspoke.
10 Something happened to December, I missed it. I was someplace,
11 I forget where.

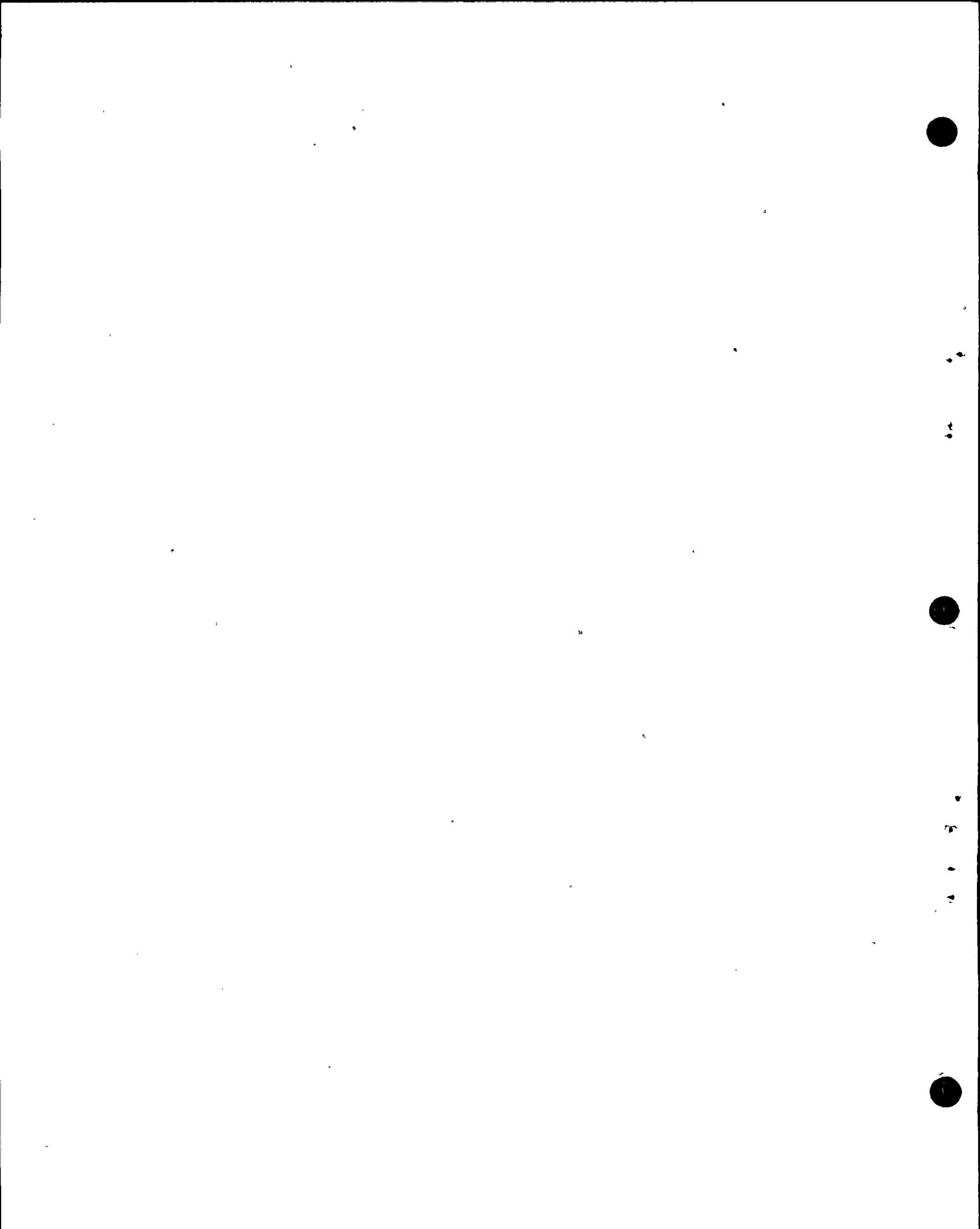
12 But anyway, we only have 11 days to file a
13 response, and I haven't even read it yet. But clearly it's
14 going to take some time to -- someone told me they read it,
15 and it won't take any time. But I don't know, we're just
16 going to need the time to work on it. There's no way we can
17 do it in the evening, preparing witnesses for examination
18 and preparing for cross.

19 The Staff has the same problem we do.

20 MRS. BOWERS: What you're working up to is no
21 Saturday.

22 MR. NORTON: Well, I don't want to do that, but
23 I don't....

24 MRS. BOWERS: Well, Mr. Norton, maybe after you
25 have a chance to go through it, like skip dinner and --



mpb4

1 MR. NORTON: I could stand that whether I go
2 through it or not.

3 MRS. BOWERS: Well, right now you don't really
4 know.

5 MR. NORTON: Well, I do know we have to get
6 something in by the 15th. And the only time to work on it
7 is this weekend, obviously. And we've got Dr. Brune coming
8 and we have to prepare for his cross-examination, and the
9 Staff's witnesses.

10 MRS. BOWERS: Mr. Hubbard is smiling all over.

11 MR. NORTON: Well, it's something that we didn't
12 contemplate this morning when we discussed scheduling; that's
13 all. And I don't know what the Staff -- has the Staff any
14 thoughts about it?

15 MR. KETCHEN: I haven't seen a copy of it yet.
16 I knew it was coming.

17 I think it just takes some thinking overnight
18 or some contemplation before we can start discussing schedules.
19 I realize tomorrow is Friday and the day after is Saturday,
20 and you're probably talking about what witnesses are going to
21 be where.

22 If that's what you're asking me, I think it just
23 takes some time with it.

24 MR. NORTON: Well, the other problem we have is
25 we intend to bring some other people down for cross-examination,



mpb5

1 like Mr. Hamilton and Jerry Frazier, and we have to notify
2 them when to be here too. And we would just like to fit
3 that in.

4 So we would just like to get a feel for what's
5 happening. But we can wait until tomorrow to discuss it
6 further, but I did want the Board to be aware that we do now
7 have another deadline.

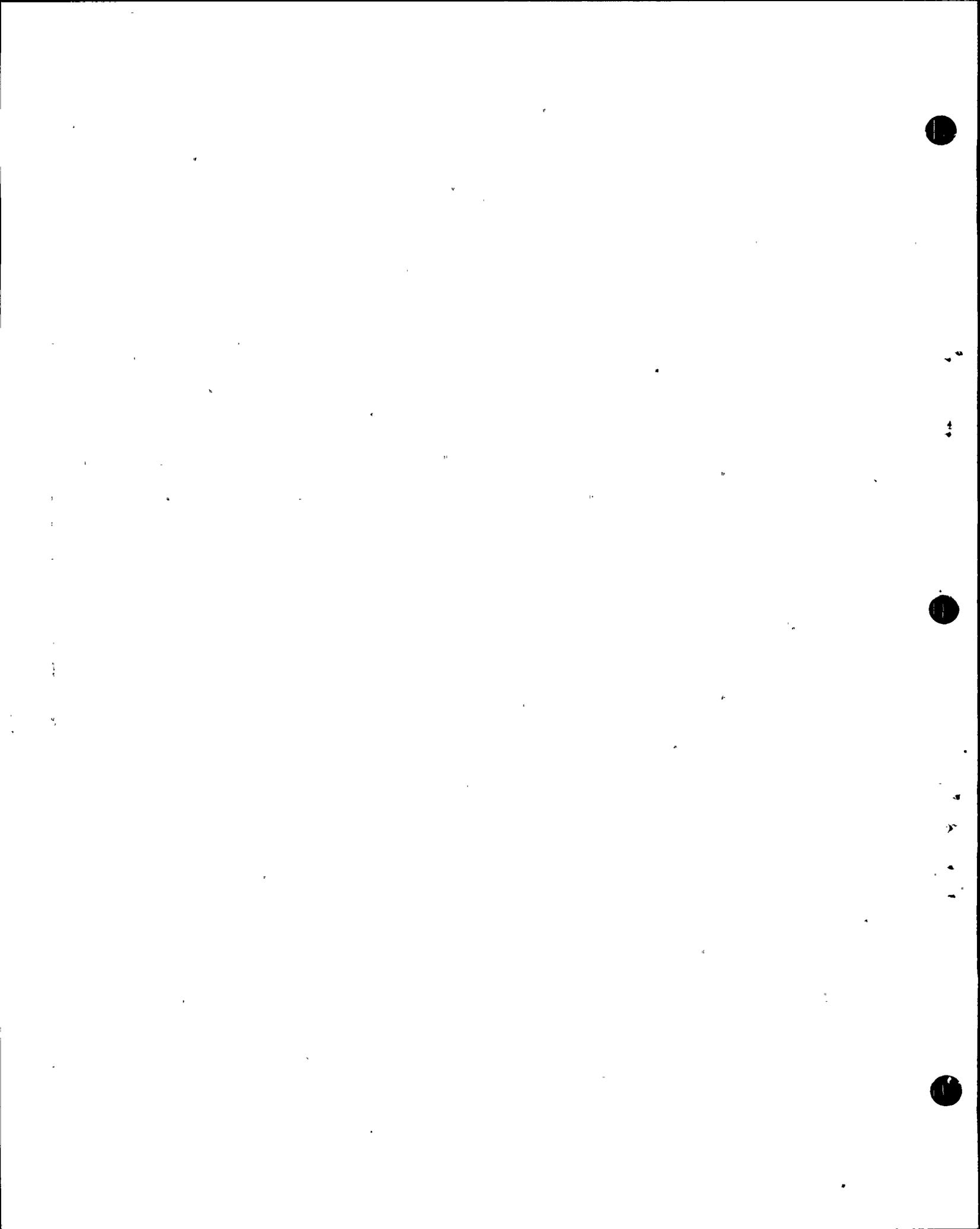
8 MRS. BOWERS: Well, and when you say January 15th,
9 is that simply from the filing of this document, or the Appeal
10 Board has done something?

11 MR. NORTON: The Appeal Board has -- Mr. Gear
12 came up and informed me that he had just gotten word that the
13 Appeal Board had evidently called his office and told us that
14 we had to have a filing by January 15th, and I assume that's
15 the same for the Staff, but maybe the Staff has another five
16 days; I don't know.

17 MR. KETCHEN: I don't know either. I haven't
18 seen the document. I have no idea what it says.

19 MRS. BOWERS: Well, if we talk about it first
20 thing tomorrow morning, would that be sufficient time for your
21 witnesses?

22 MR. NORTON: Yes. It wouldn't even have to be
23 first thing tomorrow morning. Some time tomorrow we should
24 notify our people when to make their arrangements to be here,
25 that's all.



mpb6

1 MRS. BOWERS: Well, our preference, as you know,
2 is to go ahead with the Saturday hearings with the idea that
3 having some Saturdays might eliminate an additional week, you
4 know.

5 MR. NORTON: We fully agree with that. But,
6 you know, we do have to respond to this thing, we have no
7 choice.

8 MRS. BOWERS: Well, we'll get a firm position
9 early tomorrow morning, then.

10 Mr. Ketchen -- do you have anything else, Mr.
11 Norton?

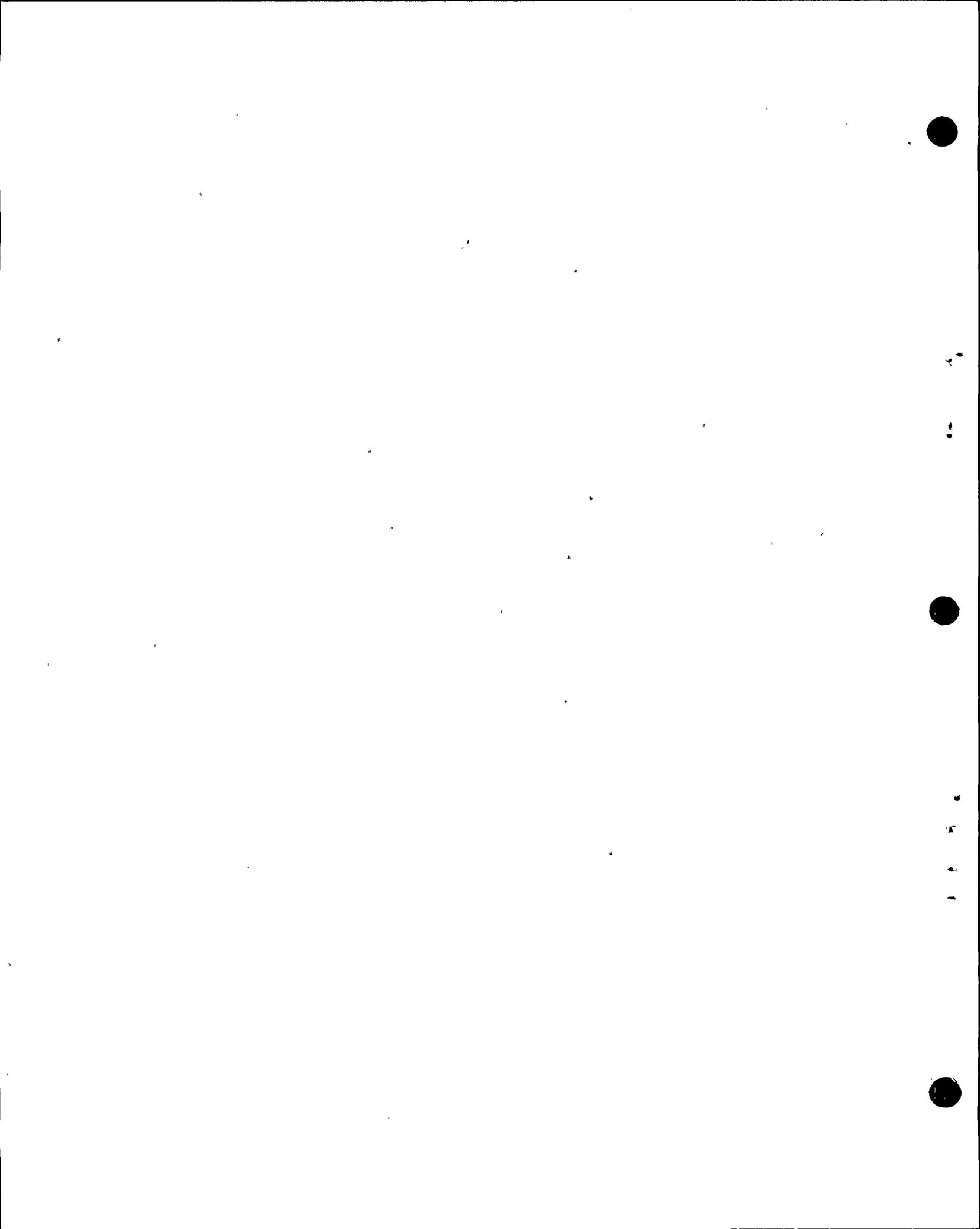
12 MR. NORTON: No.

13 MRS. BOWERS: Mr. Ketchen?

14 MR. KETCHEN: Mrs. Bowers, I also have a problem.

15 As you know, the Staff, the NRC Staff sometimes
16 plays -- or wears several hats. You read in our Appeal Board
17 decisions often that the Staff is a party but -- for most
18 purposes, but in some instances it is more of a party than
19 others, if you will.

20 We sometimes articulate that we play the role
21 of the -- or represent the public interest, which is, as I
22 say, sometimes distinguished by the Appeal Boards as being
23 a little bit different than either the Intervenor or the
24 Applicant. That's preliminary to saying that during the
25 cross-examination by the Intervenor we heard some answers



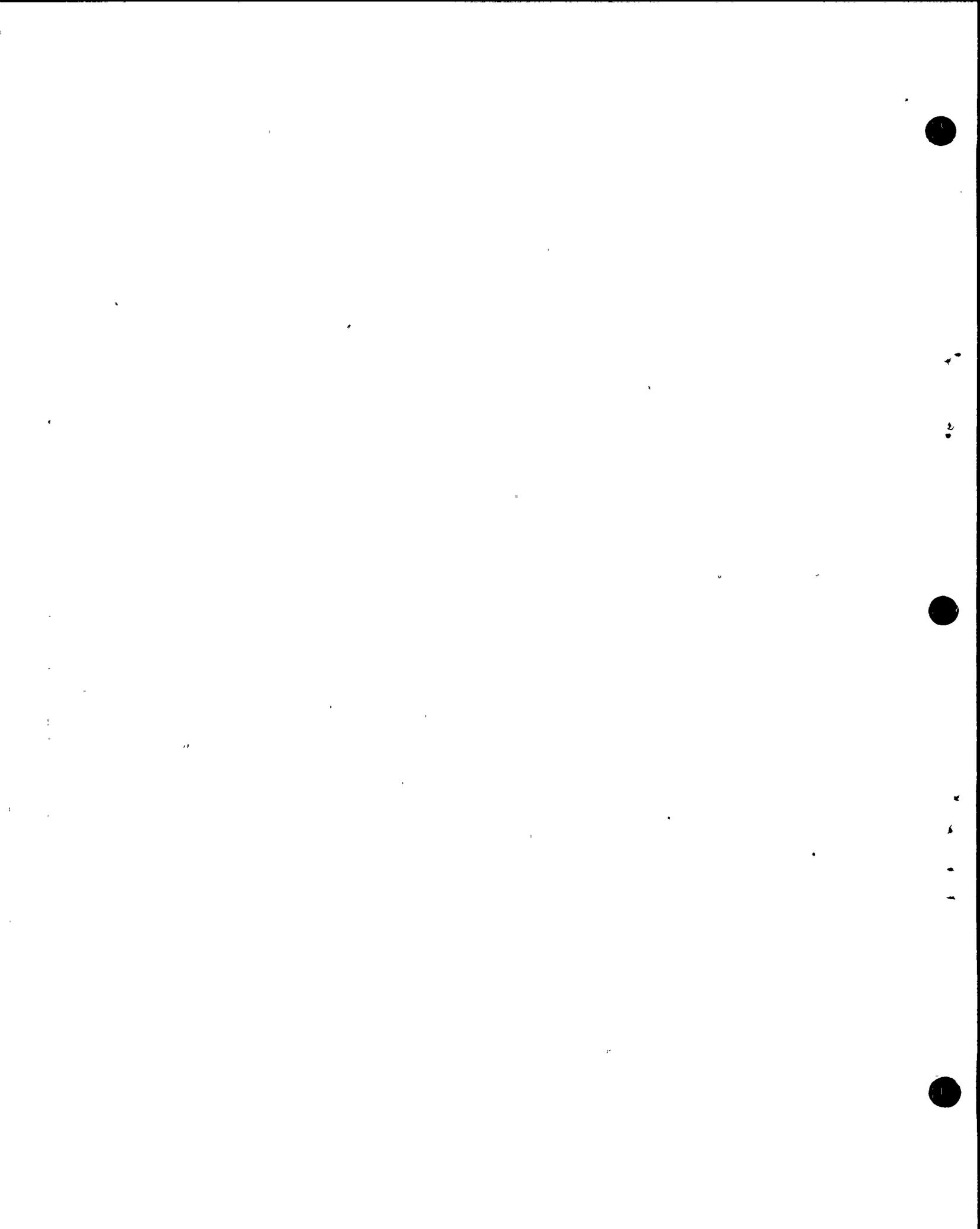
mpb7 1 and information that was first of all a little bit confusing
2 in response to the questions. And in addition to that,
3 different from what we have understood the Applicant's posi-
4 tion to be -- technical position to be on this particular
5 element of the review.

6 And as you know, this is a complex business that
7 we're in, and a complex subject that we're talking about
8 within that business.

9 So what I'm getting up to is that I am in the
10 dilemma of having a problem about this panel and not being
11 ready for cross-examination.

12 What I wish to say is that it just -- when we
13 have the prepared testimony in five days in advance of the
14 hearing it's not easy in all cases, but you do have something
15 to sit down and prepare for. But when you hear something in
16 a multi-party case brought up for the first time on cross-
17 examination, it leaves you without means sometimes to ask
18 the questions to clear up the confusion unless you have some
19 time to get with your advisors and discuss what the actual
20 testimony was and what a proper question would be to clear it
21 up.

22 So what I'm asking for is an exception to the
23 usual procedure to allow the Staff some time to prepare its
24 cross-examination of these panels based on the -- cross-
25 examination of information that was put on the record during



mpb8

1 the cross-examination by Mr. Kristovich. And I would ask
2 that that time be until some time tomorrow.

3 I would suggest in the alternative that this
4 panel be excused for that period of time, and that we continue
5 with the rest of the Applicant's direct case in the interim.

6 MRS. BOWERS: Mr. Norton?

7 MR. NORTON: That sounded like testimony.

8 MRS. BOWERS: Are you going to move to strike?

9 MR. NORTON: But I'm not going to move to strike.

10 (Laughter.)

11 MR. NORTON: I just want him to remember that.

12 (Laughter.)

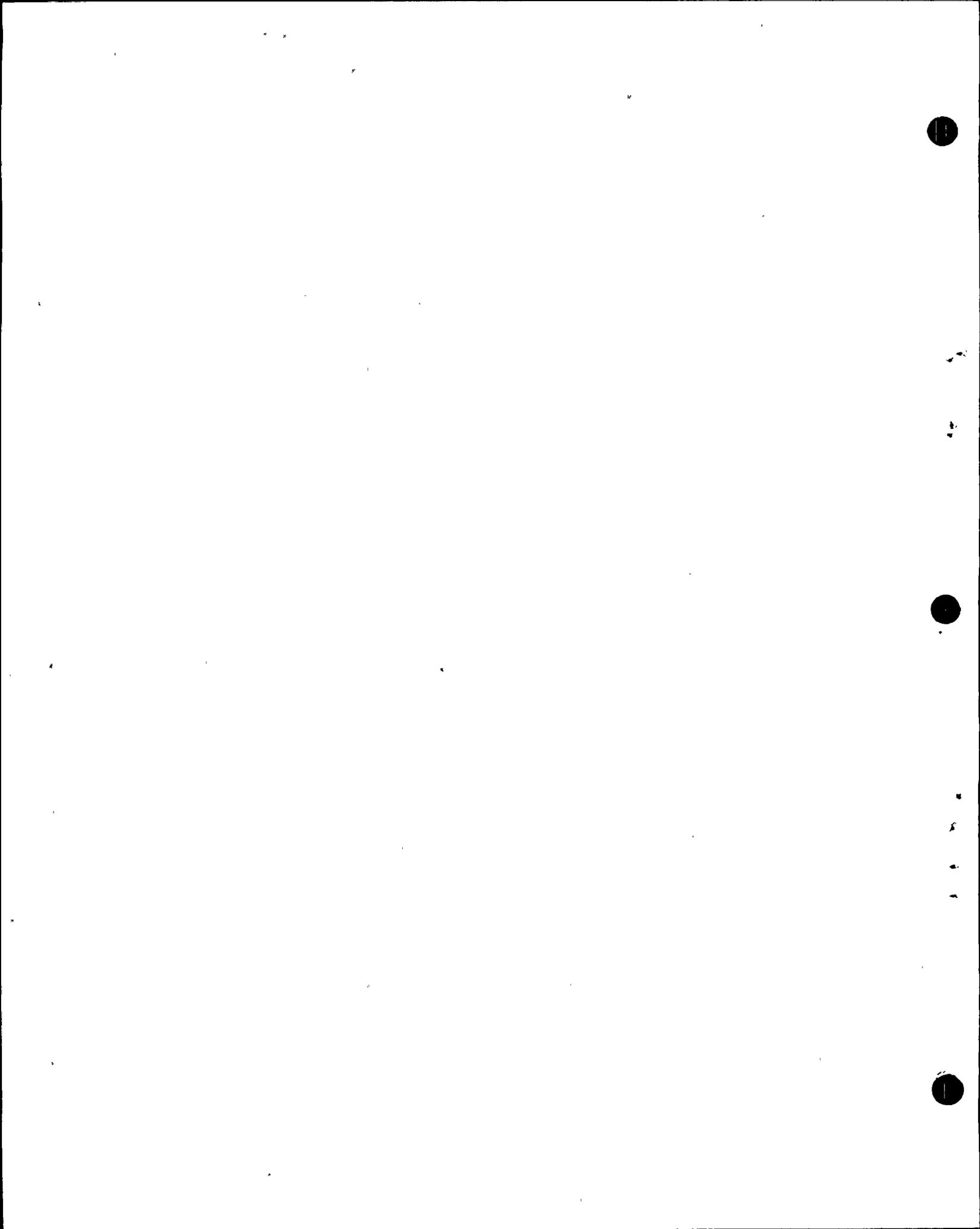
13 MR. NORTON: I don't know quite how to respond.

14 That's somewhat of an unusual request in that he heard some-
15 thing and he needs a day to prepare for cross-examination. I
16 don't know what he heard. He said something about the answers
17 were confusing to the questions, and I'm kind of at a loss of
18 what we're really talking about, so I don't really know how
19 to respond to it. It's a very unusual request.

20 I don't think we have any problem with any of
21 the witnesses being here tomorrow. But this idea of kind of
22 jumping all around is kind of hard to deal with.

23 I just don't know what he's talking about, I
24 guess.

25 MR. KETCHEN: That's my problem. It is unusual,



mpb9

1 I agree. And I really can't get into the factual details of
2 explaining what my problem is so you can understand it.

3 But without testifying and getting into the facts,
4 at least as far as the Staff is concerned, the Staff has
5 received information through this cross-examination that is
6 -- at least I'm told -- that is different from what we under-
7 stood the information to be that we received and evaluated.
8 And more than that, I have to sit down with these technical
9 advisors and find out what that really means because I don't
10 know myself.

11 And admittedly, it is an unusual request, and
12 I'm asking for the accomodation.

13 MR. NORTON: It sounds kind of like St.
14 Augustine's definition of fate. So I guess we'll have to
15 withhold any objections.

16 MR. KRISTOVICH: Mrs. Bowers, we have no
17 objection. It sounds like a reasonable way to proceed.

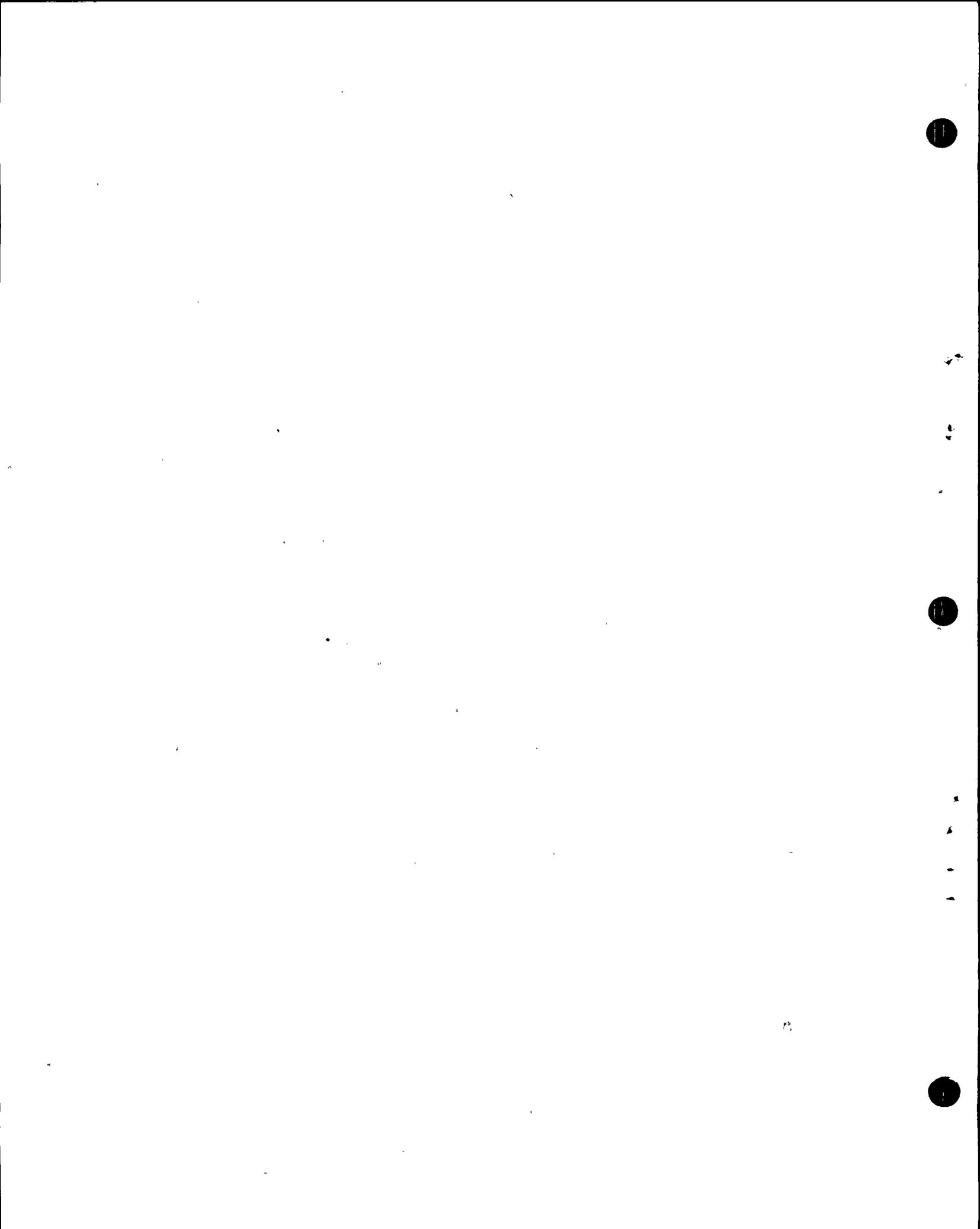
18 (The Board conferring.)

19 MRS. BOWERS: Well, the Board recognizes that
20 it is unusual. But since there are really no objections
21 from the other parties, we will plan to proceed.

22 Now, do you think you will be ready first thing
23 in the morning? Do you want the transcript?

24 MR. KETCHEN: Yes, ma'am.

25 MRS. BOWERS: Why don't you spend some money



mpbl0 1 and get an early copy.

2 MR. KETCHEN: We'll do that.

3 (Laughter.)

4 MR. KETCHEN: What I would like to do is leave
5 myself an out, and first thing in the morning is insufficient
6 time. However, I think first thing in the morning I can indi-
7 cate to you when we will be ready to proceed with the cross-
8 examination of this panel, if that's acceptable.

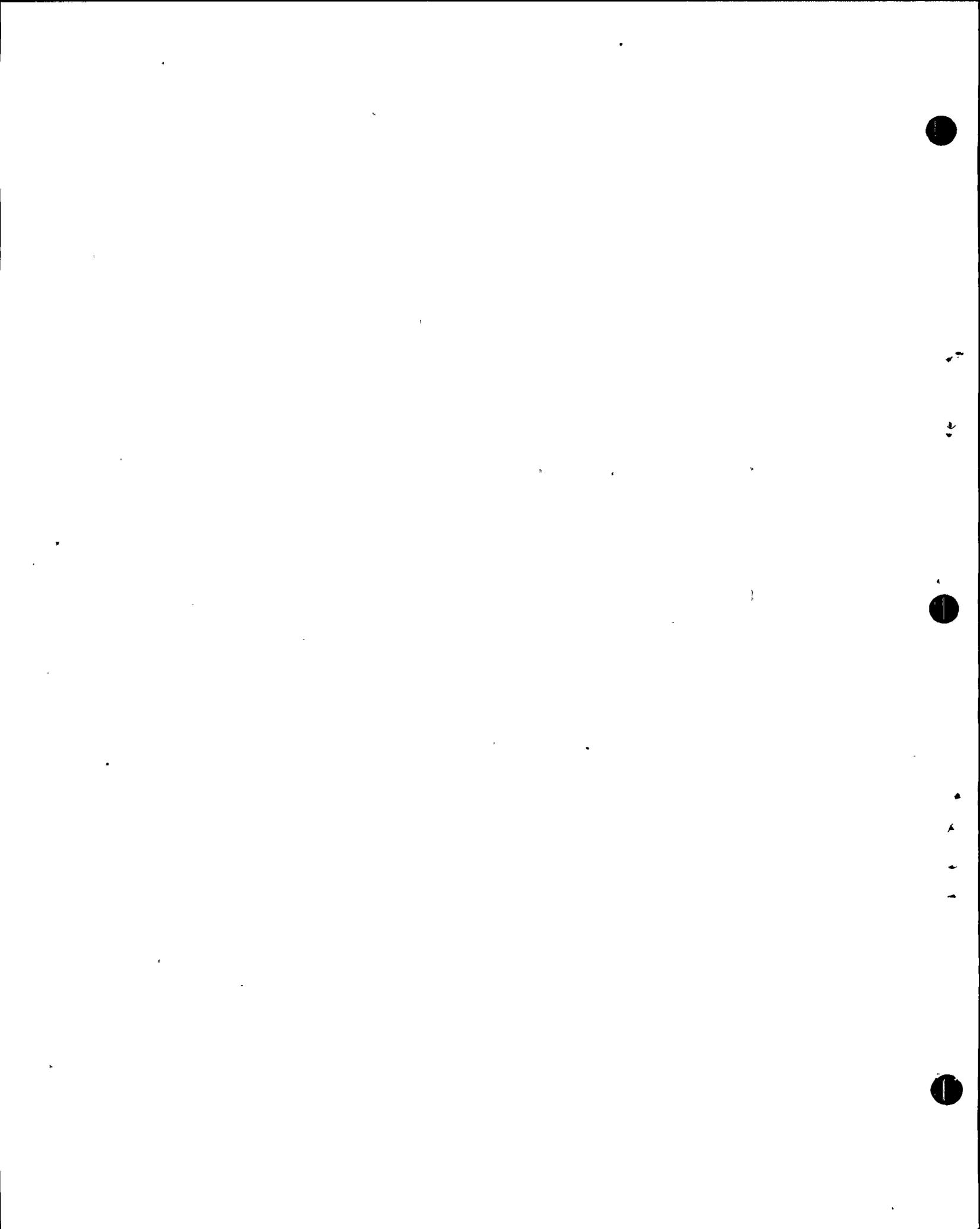
9 MRS. BOWERS: Well, I wonder, before this panel
10 is temporarily excused, it might be appropriate for us to
11 check with the Board members and see if they have questions.

12 MR. NORTON: Well, I don't understand if there's
13 more information that needs to be elicited, why it can't be
14 elicited now.

15 I guess what the Staff is saying is -- that's
16 what confuses me. I don't understand why they can't elicit
17 the information by question now. I just don't understand that.

18 MR. KETCHEN: Well, let me hark back. I'm not
19 saying it's more or additional information.

20 I think in response to the questions we heard
21 answers that have been a surprise to us, and we want to get
22 the transcript and go back through it and make sure that
23 that is the case or isn't the case. It may not be the case.
24 But we want to make sure before we proceed that that informa-
25 tion is not new or it's just the context in which we heard it,



mpbl1 1

we didn't hear it correctly, or what.

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The answers were confusing to us and we want to be sure before we proceed that our ears weren't playing tricks on us. And that's why we're asking for the accommodation, to be able to get the transcript, look back through it, and then proceed with cross-examination on that basis. And it's not that easy to do on what we've heard orally. We need to see what was actually said in response to the questions.

MR. NORTON: Well, I guess the only thing I'm asking is I don't see why we can't be told what area the problem is, or the potential problem, or the possible problem area. I don't see what the big secret is. That's what's kind of bothering me a little bit.

MR. KRISTOVICH: Well, Mrs. Bowers, that would be getting into the Staff's cross-examination. I don't know if that would be appropriate to discuss.

MR. NORTON: I'm sorry, I didn't hear what Mr. Kristovich just said.

MRS. BOWERS: He thinks you're out of order.

(Laughter.)

MR. NORTON: That's nothing new.

(Laughter.)

(The Board conferring.)

MRS. BOWERS: Well, Mr. Ketchen, we've listened carefully to your explanation and your request, and as we said

MPB 5

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mpbl2 1 earlier, there was no real objection by other parties. And
2 so we would grant it.

3 But we're at a loss as to why you can't at least
4 identify, focus in on a subject or subjects so that the
5 Applicant and the Intervenors can also review the transcript.
6 Can't that be done?

7 MR. KETCHEN: Yes, I can do that for you.

8 MRS. BOWERS: Fine. Well, that's all Mr. Norton
9 wanted.

10 MR. NORTON: This way at least one or two of the
11 people would be able to sleep tonight.

12 (Laughter.)

13 MRS. BOWERS: The rest will be writing transcript
14 corrections.

15 (Laughter.)

16 MR. NORTON: No, just one does that.

17 MR. KETCHEN: The problem with that is sometimes
18 when you wade in there and open the door, all of the water
19 rushes out.

20 It's basically in the area of application of the
21 factors in the calculation of the design stress intensity for
22 earthquake loads. We heard a practice described that we
23 understood -- hopefully without testifying -- we understood
24 differently. I didn't say that quite right.

25 But the practice we have heard described, or the



mpbl3 1 methodology is something different from what we understood it
2 to be, and what was evaluated in the Safety Evaluation
3 Report. And I say that positively; I'm not sure that's the
4 case. But it's a confusion that we have. And we wanted to
5 check back in the transcript and make sure that that was so
6 or not so.

7 MR. NORTON: I think I understand what he's
8 saying.

9 Is this the area where the -- I think it was
10 Mr. Yokoyama and Dr. Jhaveri were talking about 1.2 and 1.5.
11 Is it in that general area?

12 MR. KETCHEN: It's in that general area.

13 MR. NORTON: Okay.

14 MR. KETCHEN: And in addition to that, in
15 addition to Mr. Ko and Mr. Knight, other technical people
16 are coming tonight who can help us on this question.

17 MR. NORTON: Okay. That's all we need to know.
18 Thank you.

19 MRS. BOWERS: Well, let me go back to an earlier
20 question concerning the fact that this matter is going to be
21 left open.

22 Do you want the Board to proceed with any ques-
23 tions now?

24 MR. NORTON: I would request that the Board
25 reserve its cross until after the Staff has completed its



mpb14 1 cross, because they may ask the questions, or you may have
2 some questions that you may want to go into in that specific
3 area, and we would not want to open Mr. Ketchen's doors.

4 MRS. BOWERS: Well, we'll postpone the Staff's
5 cross-examination and any Board questions.

6 Now can you realign the panel here?

7 MR. NORTON: Yes.

8 Our next panel is for Buried Tanks and Piping
9 Systems. It will be a new panel, except Mr. Lee will return.

10 It will be Mr. McLaughlin, Mr. Lawson, Mr. Udaaka,
11 and Mr. Lee, all of whom have been previously sworn.

12 (The panel temporarily excused.)

13 Whereupon,

14 JOHN A. MC LAUGHLIN,

15 ROBERT T. LAWSON,

16 TAKEHAZU UDAKA,

17 and

18 MING E. LEE

19 resumed the stand as witnesses on behalf of the Applicant, and,
20 having been previously duly sworn, were examined and testified
21 further as follows:

22 DIRECT EXAMINATION

23 BY MR. NORTON:

24 Q Mr. McLaughlin, do you have any corrections at
25 all to the testimony?



mpb15

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A (Witness McLaughlin) Yes, I have one.

2

MRS. BOWERS: Wait a minute. I haven't located it. It's not in order, and you're skipping --

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MR. NORTON: No, it is in order. It follows the Outdoor Tanks.

5

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MRS. BOWERS: Oh, I have it now.

7

WITNESS MC LAUGHLIN: On page 3, line 18, following 10'6", the word "round" I would like to scratch and substitute "in diameter".

8

9

10

BY MR. NORTON:

11

Q All right.

12

Before we have a resume of the testimony, does each and every panel member adopt the testimony as their own?

13

14

A (Indications of assent.)

15

MR. NORTON: Let the record show that they all assented by nodding their heads yes.

16

17

And Mr. McLaughlin, would you proceed by summarizing the testimony, please?

18

19

WITNESS MC LAUGHLIN: The auxiliary saltwater for piping and the diesel fuel oil pipes, tanks, were analyzed for the Hosgri event. The methodology used, unlike other structures, for the buried pipes was Section 6 of Bechtel Topical Report Analysis of Long Buried Structures.

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The buried tanks were analyzed using a finite element analysis. The results of this analysis were that the

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mpbl6 1

stresses were all within the specified stresses. Therefore
it was unnecessary to review the actual stresses.

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That concludes my summary.

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MR. NORTON: Mrs. Bowers, I don't think it's
necessary to have the professional qualifications of the joint
authors, Mr. McLaughlin and Mr. Lawson, inserted into the
record as though read as they're already in evidence, although
we will be doing that again starting with the next group of
panels of the authors.

However, we would at this time ask that the
testimony be placed in the record as though read.

MRS. BOWERS: Mr. Kristovich?

MR. KRISTOVICH: No objection.

MRS. BOWERS: Mr. Ketchen?

MR. KETCHEN: No objection.

MRS. BOWERS: Well, the prepared testimony will
be placed in the record as though read. It will be physically
inserted.

(The Hogri Analysis and the Evaluation
of the Buried Tanks and Piping Systems follows:)

end
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1 TESTIMONY OF
2 J. A. McLAUGHLIN
3 AND
4 R. T. LAWSON
5 ON BEHALF OF
6 PACIFIC GAS AND ELECTRIC COMPANY
7 DECEMBER 4, 1978
8 DOCKET NOS. 50-275, 50-323

9
10 HOSGRI ANALYSIS AND THE EVALUATION OF THE
11 BURIED TANKS AND PIPING SYSTEMS
12

13 My testimony deals with the seismic adequacy of
14 the buried piping of the auxiliary salt water system and the
15 underground fuel oil storage tanks associated with the
16 diesel generators. The auxiliary salt water system is
17 described in Section 9.2 of the FSAR and the diesel generator
18 system is described in Section 8.3 and 9.5.4 of the FSAR.
19 The summary of the results of the seismic adequacy of these
20 elements are in Chapter 12 of the Hosgri Report.

21 I will discuss first the buried piping of the
22 auxiliary salt water system.

23 The auxiliary salt-water piping is a buried Design
24 Class I piping system. The buried portion which supplies
25 cooling water from the Intake Structure to the Component
26 Cooling Water Heat Exchangers located in Turbine Generator
Building is approximately 1600 feet long. There are two
24-inch diameter steel pipes for each unit. These lines, as
well as the buried, Design Class II, reinforced concrete,
circulating water intake conduits which provide support for



1 the auxiliary saltwater piping, have been reviewed for
2 Hosgri earthquake.

3 The auxiliary saltwater piping was placed in a
4 trench excavated in rock alongside the main cooling water
5 intake conduits. These concrete conduits were poured directly
6 against the sides of the rock trench. Each flange of the
7 piping was embedded in a concrete anchor attached to the
8 conduits. The piping is a ductile steel and is lined with a
9 1/8 inch polyvinyl chloride lining.

10 This system of intake conduits and the auxiliary
11 salt water pipe which are integrally confined in a rock
12 trench was analyzed for the Hosgri event. Results of the
13 seismic analysis are described in Chapter 12, Volume III of
14 the Hosgri Report.

15 Briefly, the method and criteria used in the
16 analysis are based on the approach given in Bechtel Power
17 Corporation's Topical Report, BC-TOP-4A, Section 6, entitled
18 "Analysis of Long, Buried Structures." During an earthquake
19 the buried pipelines are assumed to move with the surrounding
20 soil under the propagation of seismic compressional and
21 shear waves. The stresses in the pipe were computed as the
22 products of soil strains and the modulus of elasticity of
23 the pipe material. Since shear waves generally transmit the
24 greatest proportion of the earthquake's energy, they were
25 used in determining the maximum stress. Seismic input
26 parameters used in the analysis included maximum ground



1 acceleration and velocity and shear wave velocity. Internal
2 pressure of the system was also computed and combined with
3 stresses induced by Hosgri earthquake to produce the total
4 stress to be resisted by the pipe.

5 For the Hosgri seismic evaluation, yield stress
6 for the materials of construction was established as the
7 acceptance criteria for stresses due to combined seismic and
8 other loads. The results of the analyses demonstrate that
9 the stresses in the auxiliary salt-water piping and the
10 circulating water intake conduits meet this criteria. Thus
11 the auxiliary salt-water piping will perform its necessary
12 function when subjected to seismic inputs associated with
13 the Hosgri seismic event, meeting the applicable requirements
14 of Appendix A to 10 CFR Part 100. In addition, this system
15 was independently verified as part of a comprehensive design
16 review, by Harding-Lawson Associates.

17 The diesel fuel oil storage tanks are buried steel
18 tanks, 10' 6" round, 63' long, 3/8" shell with a 9/16"
19 ellipsoidal head. They are designed as a flexible buried
20 system. Seismic loads are conveyed around the tanks by the
21 surrounding soil. The tanks and connected buried piping
22 were analyzed for the Hosgri seismic event using finite
23 element analysis techniques. The results of this analysis
24 showed all stresses and deflections to be within allowable
25 limits.

26



1 The diesel fuel oil system is fully described in
2 Sections 8.3 and 9.5.4 of the FSAR. Stress analyses asso-
3 ciated with the Hosgri event are presented in Chapter 12 of
4 the Hosgri Report.

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1 MR. HORTON: At this time, we pass the panel
wrb/agbl 2 for cross-examination.

3 CROSS-EXAMINATION

4 BY MR. KRISTOVICH:

5 Q Mr. McLaughlin, were these originally designed
6 as Category 2 structures?

7 A (Witness McLaughlin) Yes, they were. Class 1
8 structures, you say?

9 Q Class 2.

10 A No, Class 1 structures.

11 Q Well on Page One of your written testimony,
12 Lines 20.25, you state:

13 "These lines, as well as the buried
14 design Class 2 reinforced concrete circulating
15 water intake conduits..."

16 Was part of this originally designed as Class 2?

17 A The concrete conduits are design Class 2.

18 Q Did you do an OBE analysis for the buried tanks?

19 A The OBE analysis for this system was in the form
20 of a design criteria. It's a buried structure. It would be
21 within or better in the elastic range than the rock it is
22 confined by.

23 Q Directing your attention to Page Two, Lines 15
24 through 18, you refer to a Bechtel Power Corporation Topical
25 Report. Is this a Topical Report that has been accepted by



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1 the NRC?

2 A Yes.

3 Q Have you personally reviewed this report?

4 A Chapter Six. Section Six.

5 Q On what basis did you decide that the approach in
6 this report was applicable to Diablo Canyon?

7 A I will let Mr. Lee answer this question.

8 A (Witness Lee) This method was recommended to us
9 by the NRC Staff during an earlier audit on this system.

10 Q When was that?

11 A That was, I believe, some time in 1975.

12 Q So your basis for using this report is the NRC
13 suggestion?

14 A Yes.

15 Q Have you independently verified that the assumptions
16 in this report are correct?

17 A Not this particular report, no.

18 Q Directing your attention to --

19 MR. NORTON: Excuse me, the last question, we have
20 a new panel up here, I'm not sure they understand how panels
21 are to operate. But the one witness said no, but the other
22 witness is indicating yes, that someone did.

23 WITNESS MC LAUGHLIN: Dr. Udaka didn't agree,
24 so he might wish to comment.

25 WITNESS UDAKA: Yes, I personally reviewed these



wrb/agb3

1 reports and the calculations.

2 BY MR. KRISTOVICH:

3 Q And verified that the assumptions underlying the
4 report were applicable to Diablo Canyon?

5 A (Witness Udaka) Yes.

6 Q Directing your attention to Page Two, Line 26
7 through Page Three, Line One, for horizontal and vertical
8 ground acceleration, what were the values that were used?

9 A (Witness Lee) The horizontal ground acceleration
10 is 0.75g and the vertical ground acceleration is 0.5g.

11 Q What were the horizontal and vertical ground
12 velocities?

13 I'm referring to the velocity --

14 A The maximum horizontal ground velocities, three
15 feet per second, and the maximum vertical ground velocity is
16 two feet per second.

17 Q Well, for the horizontal velocity of three feet
18 per second, is that 90 centimeters per second, approximately?

19 A 97 meters?

20 Q 90 centimeters.

21 A 90 centimeters. I don't have any ready reference
22 on that.

23 A (Witness Udaka) Yes.

24 Q And for the vertical two feet per second, is that
25 60 centimeters per second?



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wrb/agb4

1 A Right.

2 Yes, the statement is right.

3 MRS. BOWERS: I missed the name of the third
4 witness.

5 MR. NORTON: It's Mr. Lawson.

6 MRS. BOWERS: Thank you.

7 BY MR. KRISTOVICH:

8 Q Well, what was the basis for picking these numbers,
9 90 centimeters per second and 60 centimeters per second?

10 A (Witness Leo) This number was supplied to us by
11 URS/Blume Consultants.

12 Q Are any of you members of URS/Blume?

13 A (Chorus of no.)

14 A (Witness Udaka) Can I add another thing?

15 This is the basis of the time history which we
16 are given. The time history shows -- although maximum
17 acceleration 0.75 --

18 Q I'm sorry, the time history shows what?

19 A Maximum acceleration as 0.75 for horizontal
20 direction, but the velocity is lower than three feet per
21 second.

22 If you integrate once, you can get the velocity.
23 If you integrate twice, you can get displacement. If you
24 compare the maximum value compared to three foot and two foot,
25 there's a displacement. This number is quite a conservative



wrb/agb5

1 number.

2 Q This number is referring to the 90 centimeters
3 per second?

4 A Right.

5 Q And the 60 centimeters per second?

6 A Right.

7 MR. NORTON: Excuse me, Mrs. Bowers.

8 I hate to interrupt the cross-examination here,
9 but I forgot during the direct to identify that Mr. Lee and
10 Mr. McLaughlin are with Pacific Gas and Electric, and Mr.
11 Lawson and Mr. Udaka are with Harding, Lawson Associates,
12 I believe is the name of the company and our consultants.

13 BY MR. KRISTOVICH:

14 Q I'd like to refer to Joint Intervenors' Number 45,
15 which is USGS Number 672, and I'd like to refer specifically
16 to Page Three and we'll provide a copy of that to the panel
17 of witnesses.

18 (Document handed to the witness panel.)

19 MR. NORTON: Excuse me, if we're going to get
20 into Circular 672, I think we had better call Dr. Blume back
21 up here, because these numbers were supplied by URS/Blume,
22 and it was Dr. Blume's organization that derived the numbers of
23 acceleration, et cetera, and I assume if you are in Circular
24 672 that that's what you're getting into.

25 We'd like to bring Dr. Blume back up.



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wrb/agb6

Whereupon,

JOHN A. BLUME

resumed the stand as a witness on behalf of the Applicant,
and, having been previously duly sworn, was examined and
testified further as follows:

WITNESS BLUME: It's nice to be wanted.

BY MR. KRISTOVICH:

Q Referring to Page Three of Joint Interveners'
Exhibit Number 45, what are the peak horizontal velocities
for a 7.5 magnitude earthquake?

A (Witness Blume) The first peak is listed at 135
centimeters per second. The second peak at 115, and the third
peak at 100.

I must note also that these are not for rock.

Q Mr. McLaughlin, what figures do we use for shear
wave velocity?

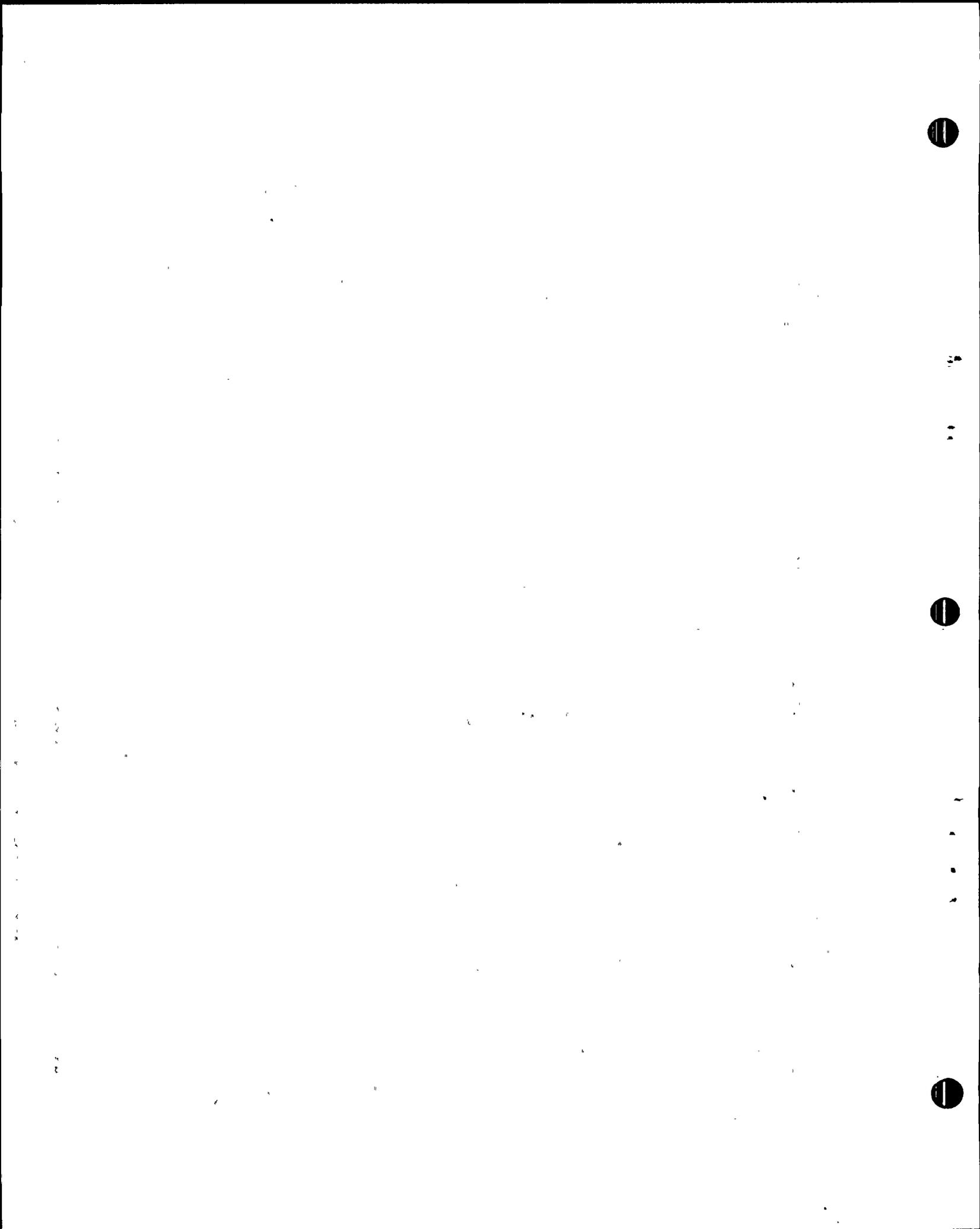
A (Witness Lee) 3600 feet per second.

Q And what's your basis for using that figure?

A Again, this information was given to us by John
Blume.

MR. NORTON: Mrs. Bowers, I believe the 3600 feet per
in the rock has been gone over and over and
over. I assume we're not going to do it again. I mean,
it's a given value.

BY MR. KRISTOVICH:



WRB/agb7

1 Q What percentage damping did you use for the tanks?

2 A (Witness Lee) I don't know anything about a tank.

3 A (Witness McLaughlin) That would be Dr. Udaka.

4 A (Witness Udaka) You're referring about the
5 underground fuel storage tank?

6 Q Yes.

7 A Three percent.

8 Q Three what?

9 A Three percent.

10 Q And for the buried piping, what percent of
11 damping?

12 A (Witness Lee) We don't use any percentage of
13 damping.

14 Q For the piping?

15 A That's correct.

16 Q Mr. Udaka, what is the basis for the three percent
17 damping for the tank?

18 A (Witness Udaka) Well, it's a steel structure,
19 and normally you use seven or four percent, but three
20 percent is more conservative, just I wanted to make sure I
21 was on the conservative side.

22 Q Directing your attention to Page Three, Line Five,
23 in calculating yield stresses, did you use the average of
24 actual material values for concrete and steel for your
25 acceptance criteria?



wrb/agb8

1 A (Witness McLaughlin) As I stated in my summary,
2 we used the design stresses, design values. It was unnecessary,
3 after the first analysis, to review actual stresses or actual
4 strengths, excuse me.

5 Q Is it true that for circulating water intake
6 conduits, the concrete was calculated to crack?

7 A (Witness Lee) If we are utilizing the concrete
8 to resist tension, yes. But we do not use the concrete to
9 resist any tensile force.

10 Q And the rebar was assumed to carry the entire
11 tension load?

12 A That's correct.

13 Q What was the safety margin for the buried tanks
14 at the most critical point?

15 A (Witness McLaughlin) That would be Dr. Udaka.

16 A (Witness Udaka) We computed several cases of
17 loading conditions. The most critical case factor of safety
18 is 1.83.

19 Q 1.83?

20 A Yes.

21 Q And where was that located?

22 A Give me probably one minute.

23 (Pause.)

24 Somewhere around the left corner, somewhere in
25 here (indicating).



1 wrb/agb9

MRS. BOWERS: Now wait a minute --

2 WITNESS LAWSON: He's indicated a cross-section
3 of the tank and indicating at about seven o'clock on the
4 circular cross-section.

5 BY MR. KRISTOVICH:

6 Q How did you arrive at the figure 1.83?

7 A (Witness Udaka) Compared to the available strains
8 and induced stress plus static stress. Initially we have some
9 static stress because it's an underground structure, so we
10 analyzed for the static case. Then we analyzed the dynamic
11 case and we superimposed and compared the two strengths
12 and division is a factor of safety.

13 Q What was the safety margin for the piping at the
14 most limited location?

15 A (Witness Lee) Based on the specified design
16 stress, the factor of safety for the auxiliary saltwater
17 pipe is 1.8, and the factor of safety for the circulating
18 water conduit is 1.3.

19 Q And how did you arrive at those figures?

20 A Those figures were arrived at -- first of all, we
21 calculate the induced stresses on the pipe, and we divide
22 the stress by the allowable stress and came up with the
23 factor of safety.

24 11G

25 2a flws



1 Q Directing your attention to page 3, lines 8 through
2 10, for the auxiliary salt water piping what is the ratio
3 of allowable stress to calculated yield stress?

4 A (Witness Lee) Again, the allowable used stress
5 is 30 KSI.

6 Q On page 3, at line--

7 A Excuse me; I think I am misunderstanding your
8 question. Could you repeat the previous question, please?

9 Q For the auxiliary salt water piping what is the
10 ratio of allowable stress to calculated yield stress?

11 A (Witness McLaughlin) Calculated yield stress?
12 What's that?

13 Q I'll strike the question and move on.

14 MRS. BOWERS: The answer should be struck, too,
15 then.

16 MR. NORTON: Yes. We would ask that the answer to
17 the previous question which he didn't understand, which was
18 the same question, be stricken.

19 MR. KRISTOVICH: That's fine.

20 BY MR. KRISTOVICH:

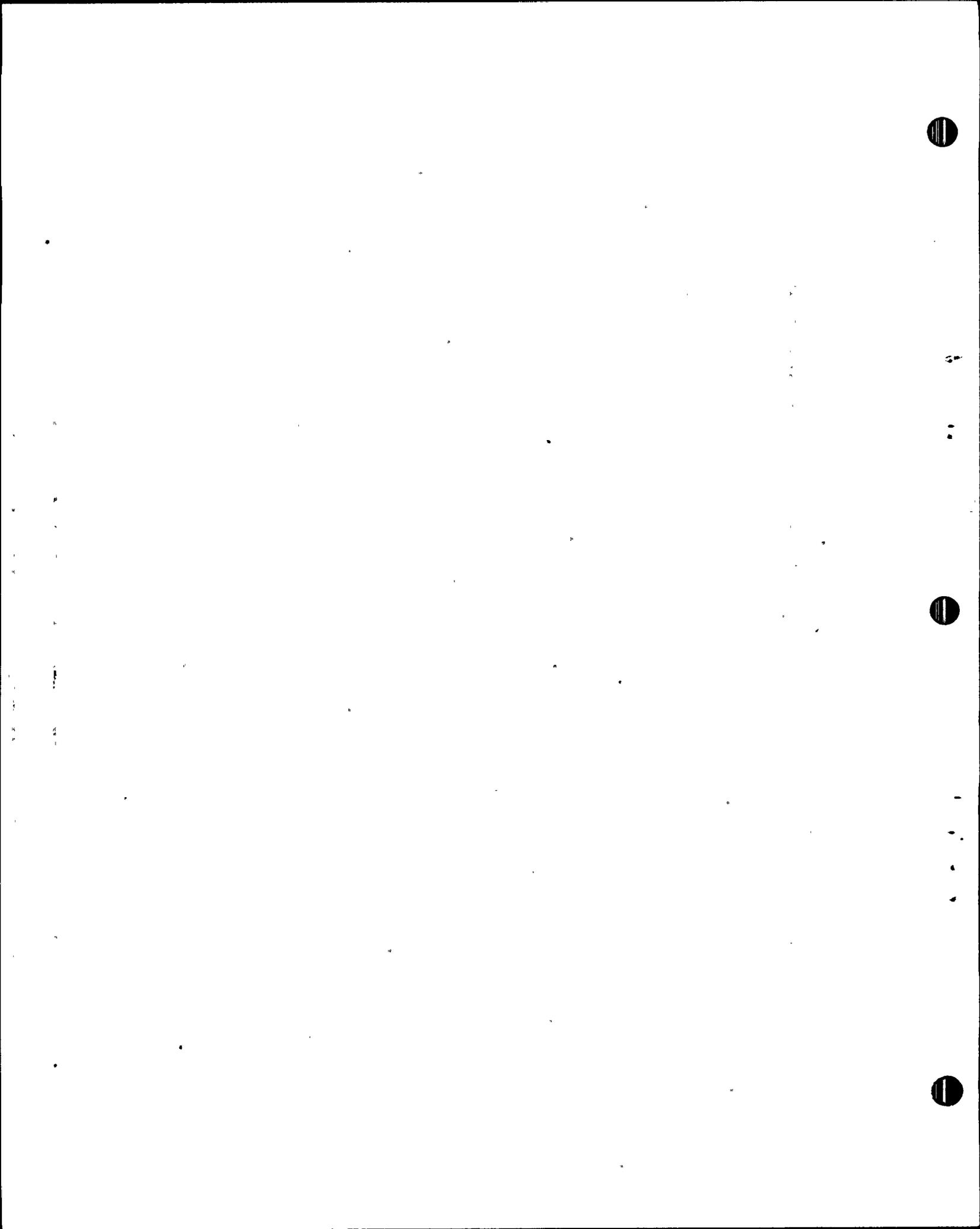
21 Q On page 3, lines 24 to 25, what do you mean by
22 allowable limits?

23 A (Witness McLaughlin) That would be for Dr. Udaka.

24 A (Witness Udaka) The deformation we compute from
25 the tank to, I guess, the turbine generator building is less

WRR/wbl

12.230



1 than design deformation which is -- we are given two inches
2 of allowable deformation between tank and, I guess, turbine
3 generator building. And our computation shows about a
4 quarter inch of displacement. So it's in the allowable range.

5 Q Well what is the minimum safety factor for
6 stresses?

7 A We didn't compute a stress. We just computed
8 how many deformations occur during an earthquake, how many
9 deformations alone. So it's just simply deformation, it's
10 not stress.

11 In other words, we don't use stress.

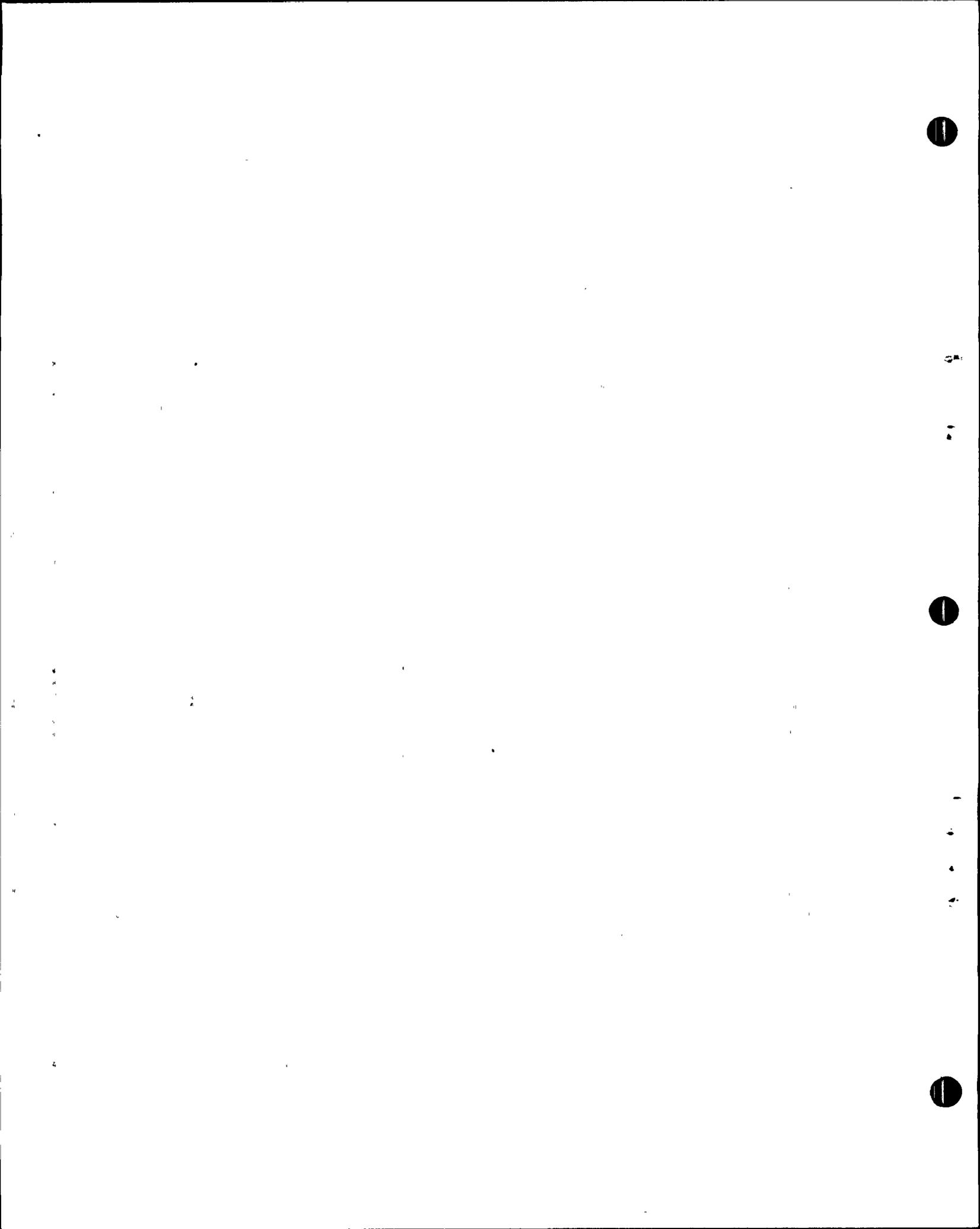
12 A (Witness Lawson) Perhaps I could amplify on that
13 a little bit.

14 Dr. Udaka is refering to the check of the motion
15 between the buried tank and the structure which is relatively
16 fixed with respect to the tank. One of the givens for his
17 analysis was that that piping connection was designed for
18 two inches of motion without overstressing. And he checked
19 the deflection and found it as a small fraction of an inch
20 and, therefore, did not approach the stress limits.

21 Q Did you do an OBE analysis for the tanks?

22 A (Witness Udaka) No.

23 Q For the underwater and diesel tanks-- For the
24 diesel tanks how were the horizontal and vertical loads due to
25 seismic sloshing of fluids included in your models of the



1 diesel fuel oil storage tanks?

2 A Okay. The fuel oil tank is essentially full,
3 so--

4 Q Is essentially -- what?

5 A Full. So there is no void that must be filled
6 with fuel oil and diesel oil. So we model diesel oil as a
7 kind of solid.

8 Fluid can transmit p-waves but not shear waves,
9 so we model the material type as close as zero for shear
10 wave inside the tank. And we analyze both horizontal and
11 vertical excitation independently. Later we add them
12 together. So it's on an absolute sum basis.

13 MR. KRISTOVICH: Could the reporter read that
14 back, please?

15 (Whereupon the Reporter read from the record
16 as requested.)

17 BY MR. KRISTOVICH:

18 Q Dr. Udaka, correct me if I'm wrong, but does that
19 mean you'd not analyze the fluid motion in the tanks?

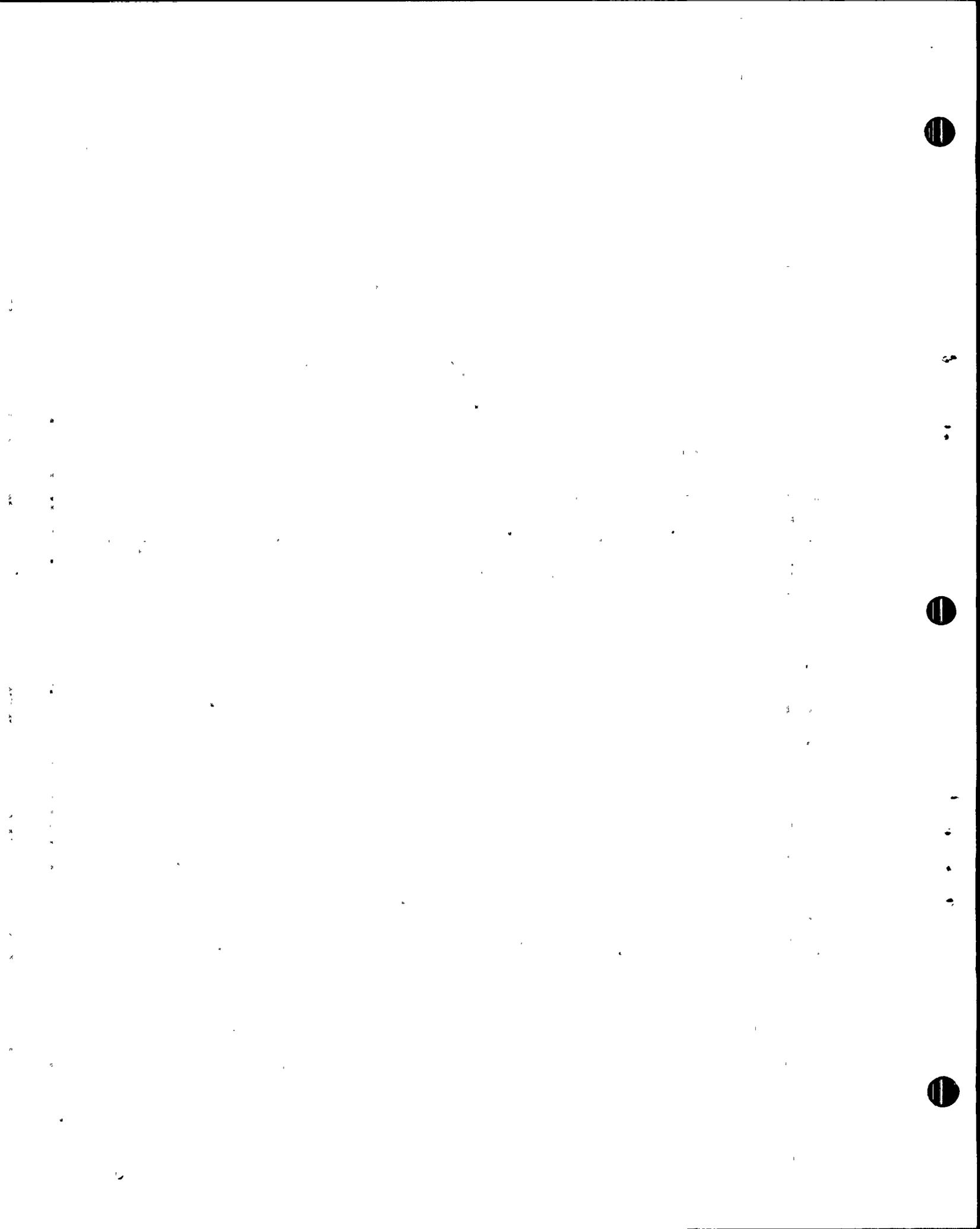
20 A (Witness Udaka) That's correct. And I would like
21 to add: we don't need to analyze oil motion inside the tank
22 because it's all full. So it acts as one body. There is
23 no fluid action inside the tank.

24 Q How do you know it is all full?

25 A That's what I was given.

WRB/wb3

300



1 Q Will it always be full?

2 A Pardon me?

3 Q Will the tank always be full?

4 A Right.

5 Q If the tank were not full how would that change
6 your analysis?

7 A We did not submit a result. But I personally
8 performed that case. And it doesn't change that much the
9 factor of safety.

10 Q How much is "not that much?"

11 A Well I didn't compute the factor of safety. I
12 can see from the stress level. It is not required.

13 Q It's not -- what?

14 A It's not required.

15 MR. KRISTOVICH: No further questions.

16 MRS. BOWERS: Mr. Ketchen?

17 MR. KETCHEN: One moment, please.

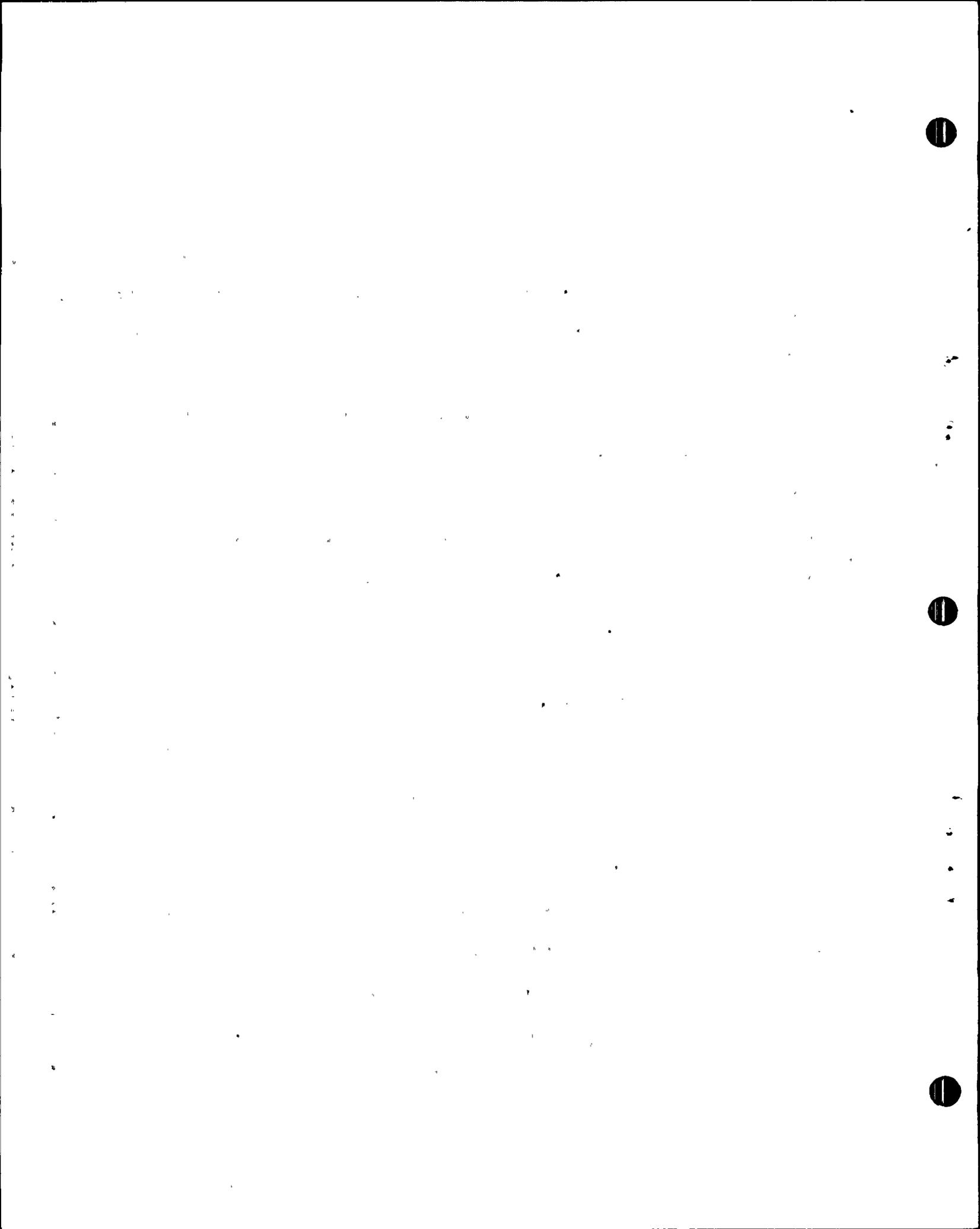
18 (Pause)

19 MR. KETCHEN: The Staff has no questions, Mrs. Bowers.

20 EXAMINATION BY THE BOARD

21 BY MR. BRIGHT:

22 Q I'm having a little trouble with the physical
23 picture of this relationship between the main cooling water
24 conduits and the auxiliary sea water conduits. Where is the
25 auxiliary salt water piping in relationship to the-- Ah, I see



1 you have a figure there.

WRB/wb5
2 A (Witness McLaughlin) There is a comparable
3 picture to this in the Hosgri Evaluation Report.

4 Q If you could cite that for the record it would
5 help, because that does clarify the situation. --to me, anyway.

6 MR. KRISTOVICH: could we have a citation to the
7 comparable picture?

8 MR. NORTON: We're trying to find it in the Hosgri
9 evaluation. And as soon as we find it we'll give you the
10 cite.

11 MRS. BOWERS: Our copy of the Hosgri evaluation
12 has been in the mail for ten days, and we haven't received it.

13 MR. BRIGHT: No; my secretary has been mailing it
14 for ten days.

15 (Laughter)

16 MR. NORTON: Could we go on? As soon as find
17 the reference we'll give it to you.

18 MR. BRIGHT: Fine.

19 BY MR. BRIGHT:

20 Q I just have one other thing. On page 3-- I think
21 I've gone through this little tapdance before during this
22 hearing. Now on line 5, "The yield stress for the materials"--
23 and I presume by this you mean a particular material of
24 construction. --"was established as the acceptance criteria
25 for stresses." Okay. Fine.



1 Then we go on down and we see "The results
2 demonstrate that the stresses meet this criteria."

3 Now is that just one material? Is there only
4 one criterion, or are there a number of criteria? Because
5 it's confusing to me. I don't know whether you're talking
6 about one thing or--

7 MR. NORTON: Excuse me, Dr. Bright. You must
8 remember that this panel wasn't here when we went through
9 the tapdance before. And the question revolves around the
10 singular and plural use of the word.

11 BY MR. BRIGHT:

12 Q All I'm saying is, it is "these criteria" or
13 "this criterion" and I just would like to know which.

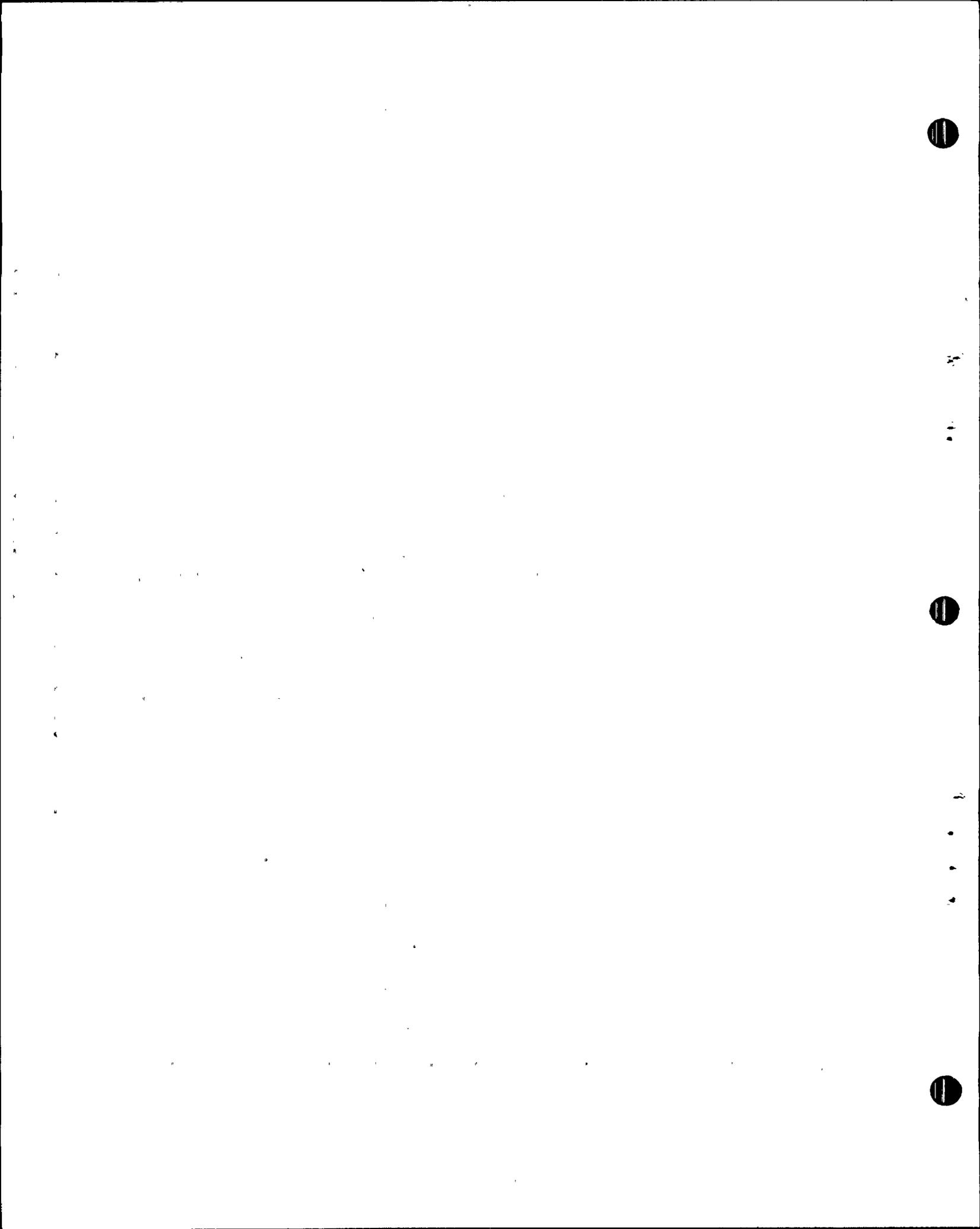
14 A (Witness McLaughlin) I believe these criteria
15 involve several materials, concrete and steel, which have
16 different properties, different yields. So that "these" --
17 plural -- is to the various materials.

18 Q It would be "these criteria," then. That clears
19 it up very nicely.

20 MR. NORTON: Line 10 of the testimony, if you
21 read the last two words of the sentence, it says "this
22 criteria." And what you're saying, in other words, is it
23 should be "these," is that correct?

24 WITNESS MC LAUGHLIN: I believe so, yes.

25 MR. NORTON: Okay.



1 MR. BRIGHT: Thank you.

2 WITNESS LEE: Excuse me. The figure is in the
3 FSAR, 9.2.

4 MR. NORTON: That's the FSAR, not the Hosgri
5 Report?

6 WITNESS LEE: Not the Hosgri.

7 MR. NORTON: Okay.

8 And, for the record, that was the figure that
9 Dr. Bright asked about, or that was shown to Dr. Bright regard-
10 ing relationship of -- and somebody is going to have to
11 finish that sentence.

12 WITNESS MC LAUGHLIN: --the concrete cooling water
13 conduit and the two 24-inch auxiliary salt water pipes.

14 MR. KRISTOVICH: Would it be possible-- We don't
15 have the FSAR with us. Could we see the diagram, please?

16 (Document handed to Mr. Kristovich)

17 MR. NORTON: Mrs. Bowers, I think we can proceed
18 with Board questions.

19 BY MRS. BOWERS:

20 Q Well I have a question, and it may be that this
21 panel really is not the appropriate group.

22 When we were considering some of the earlier
23 structures, of course I understood when you're talking about
24 containment and the turbine building and the intake and that
25 sort of thing. But with the last panel and also with this



1 panel what I'm wondering is, if something happened to the
2 buried tanks and the piping systems that are covered here,
3 are they essential to the operation, or are they kind of
4 auxiliary? Could there be a loss of some of this equipment
5 and still the reactor function fully?

6 A (Witness McLaughlin) Mrs. Bowers, for this
7 panel this was a given, that the integrity of the pipes, or
8 the integrity of the tanks must remain intact. It was a
9 given. What effect it has on the system analysis is for
10 another group.

11 MR. NORTON: Yes, Mrs. Bowers. This panel is
12 not the panel to answer that question. That is not to imply
13 an answer to your question, but this is not the panel to
14 answer your question. It will be systems and functions
15 required, which is going to occur maybe later this afternoon:
16 Mr. Gangloff of Westinghouse, Mr. Gormley, Mr. Laverty and
17 Mr. Shiffer, all the latter three of Pacific Gas & Electric.
18 It's about two panels away.

19 MRS. BOWERS: I'll wait.

20 Well let's check with the parties and see if there
21 is redirect or if the Board's questions raised any questions.

22 REDIRECT EXAMINATION

23 BY MR. NORTON:

24 Q Dr. Blume, first I have a question or two for you.

25 Circular 672 was brought out again, and after some

WRB/wb8

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1 of the witnesses testified about the velocities used in this
2 analysis and then you were asked to read off the velocities
3 listed in Circular 672 for a magnitude 7.5 earthquake.

4 My question to you is: Do those velocities that
5 were read by you that were contained in Circular 672 apply to
6 the Diablo Canyon site?

7 A (Witness Blume) No, not at all.

8 The reason is that--

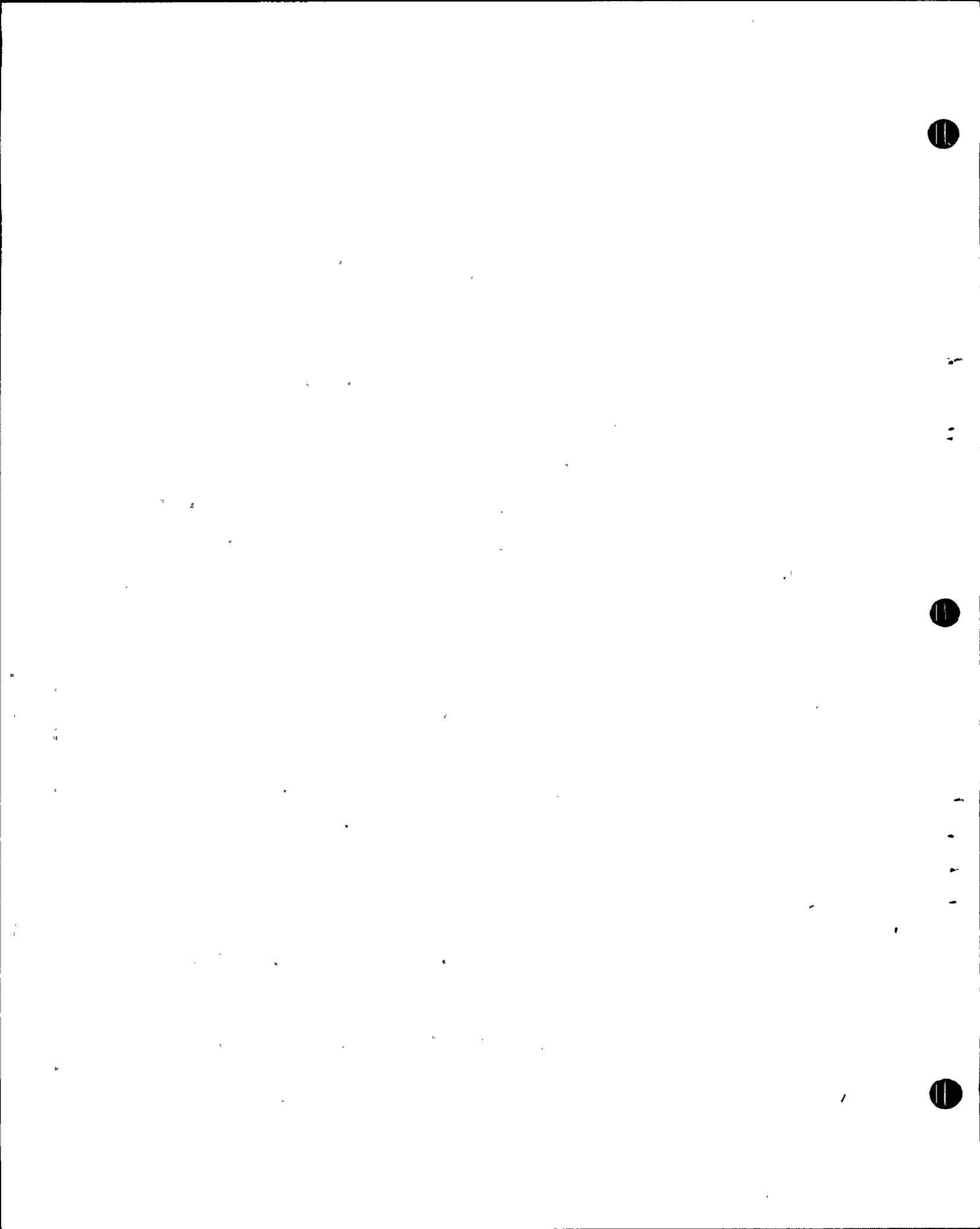
9 Q Well, Dr. Blume, you don't have to go any further.
10 You have answered the question.

11 Another term that I've heard used a number of
12 times is "cracked concrete."

13 Dr. Blume, could you-- To a layman, I can think
14 of a wall that's cracked diagonally from corner to corner
15 or from top to bottom or, you know, end to end, or something
16 like that. Is that what you mean by a crack in concrete? Is
17 that the way the term is being used here?

18 A No, not in the usual usage. Concrete by its
19 very nature has to crack a tiny amount before the reinforcing
20 steel can go into tension to any appreciable degree. This is
21 allowed for in design. It's the nature of the material. And
22 it explains why concrete has to be reinforced.

23 So usually the term "cracks" that I've heard
24 around here implies that type of cracking that shows that the
25 concrete is working as it is supposed to work.



wrb/agbl
flwswrb/wb9

1 Q All right.

2 So, for a future reader of the record then, when
3 we're using the term in concrete, we're not talking about a
4 crack that you can see that goes the entire length of the
5 concrete wall or anything like that?

6 A No, those would be diagonal damage cracks as
7 compared to the normal type of cracks that we get from stress.

8 Q All right.

9 Dr. Udaka, you were asked some questions about
10 assuming that you were given as an assumed that the tanks
11 were full and you did your analysis on that basis, and then
12 you were asked if the tanks were always full, and I believe
13 you said -- and I'm not sure, correct me if I'm wrong --
14 that even though you weren't asked to, you personally did
15 some sort of an analysis with the tanks not full, is that
16 correct?

17 A (Witness Udaka) Yes, I was expecting that kind
18 of a question before the NRC hearing, so I performed that
19 analysis just in case.

20 Q All right. Let me ask you this then: if the
21 tanks were only one-half full, would the conclusions of your
22 analysis change?

23 A Well my personal feeling is no, but I haven't done
24 any analysis of the half-full case, so that's my opinion.

25 Q What case did you do?



wrb/agb2

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A Just the empty case and the full tank and just
the tank has no stiffness -- excuse me, oil has no stiffness
and only mass.

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Q So in your opinion then, if it were less than
full, the results would not change significantly enough to
put it in a condition where your conclusions would change?

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MR. KRISTOVICH: Objection, Mrs. Bowers, it's
a leading question. I believe the witness has already answered
the question, and now Mr. Norton is just rephrasing it and
leading the witness which is inappropriate.

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12
MR. NORTON: I'll rephrase the question.

13
14
MRS. BOWERS: I thought he was rephrasing it
to make sure that there was complete communication.

15
16
MR. NORTON: I'll rephrase the question again.

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18
BY MR. NORTON:

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Q Is it your testimony, Dr. Udaka, that if you were
to do the analysis showing the tank partially full or less
than full, that your conclusions would be the same?

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22
MR. KRISTOVICH: Objection. Dr. Udaka has already
stated he hasn't done the analysis. I don't understand the
basis for asking if he were to do this hypothetical analysis.

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MRS. BOWERS: Well he stated he did an analysis
with the tank full and an analysis with it empty, and Mr. Norton
is trying to find out if there was a significant difference
in the conclusion.



wrb/agb3

1 MR. KRISTOVICH: That's not the way I understood
2 the question that was asked.

3 MR. NORTON: That's exactly the way it was asked.

4 MRS. BOWERS: Dr. Martin says the question stated
5 a conclusion.

6 DR. MARTIN: It contained one.

7 MRS. BOWERS: Actually, in an administrative
8 hearing -- and I haven't volunteered this before -- it's
9 permissible to ask leading questions on direct as well as on
10 cross-examination.

11 Now, leading questions don't carry -- the
12 answers don't carry the same weight as a proper question that
13 is not leading. But certainly there is no clear prohibition
14 against them.

15 MR. NORTON: Well Mrs. Bowers, I'll try to frame
16 the question so it isn't leading. Obviously, what I'm trying
17 to find out is what Mr. Udaka's opinion is regarding an
18 analysis of the tank where it contains fluid more than empty
19 and less than full.

20 BY MR. NORTON:

21 Q With that, Mr. Udaka, could you tell us what your
22 opinion is?

23 I don't think that's leading at all.

24 MR. KRISTOVICH: Objection. Are you asking what
25 his opinion would be if he were to do the analysis?



wrb/agb

1 MR. NORTON: I'm asking him what his opinion is,
2 period, and if you want to cross-examine further -- Mrs.
3 Bowers, if counsel wants to cross-examine further after the
4 answer he can.

5 MRS. BOWERS: Well what's the basis for the
6 objection?

7 DR. MARTIN: That question was asked earlier and
8 answered. He gave you his opinion.

9 MRS. BOWERS: Well he gave the opinion on the
10 empty and the full, but you're apparently looking for something
11 in between.

12 MR. NORTON: Where it's got some liquid in it.

13 MR. KRISTOVICH: I guess the problem is I believe
14 Dr. Udaka has done the analysis when it's empty and when it's
15 full and hasn't done the analysis for anything else, so I'm
16 having a hard time knowing how he can form an opinion when
17 he hasn't done the analysis.

18 MRS. BOWERS: Well as an expert witness, can't
19 he give an opinion?

20 MR. NORTON: Well I can lay some foundation for
21 that opinion too.

22 BY MR. NORTON:

23 Q Based on the analysis that you did, Dr. Udaka,
24 for the tank full and based on the analysis you did for the
25 tank empty, are you able to arrive at an expert opinion as to



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wrb/agb5

1 what an analysis would show with the tank partially full?

2 A (Witness Udaka) My answer is yes.

3 Q All right.

4 A Because we have plenty enough margin factor of
5 safety, so even in the half-full case I think the structure
6 is safe enough during the earthquake.

7 MR. NORTON: I don't have to ask the next question.

8 MRS. BOWERS: Does that conclude?

9 MR. NORTON: Let me check my notes.

10 (Pause.)

11 BY MR. NORTON:

12 Q Now we talked about the buried tank, and there was
13 some question, I believe, about the stresses in the tank, the
14 buried tank itself. Were the stresses in the tank determined?

15 A (Witness Udaka) How or where?

16 Q Were they determined, the stresses in the tank
17 itself, were they determined?

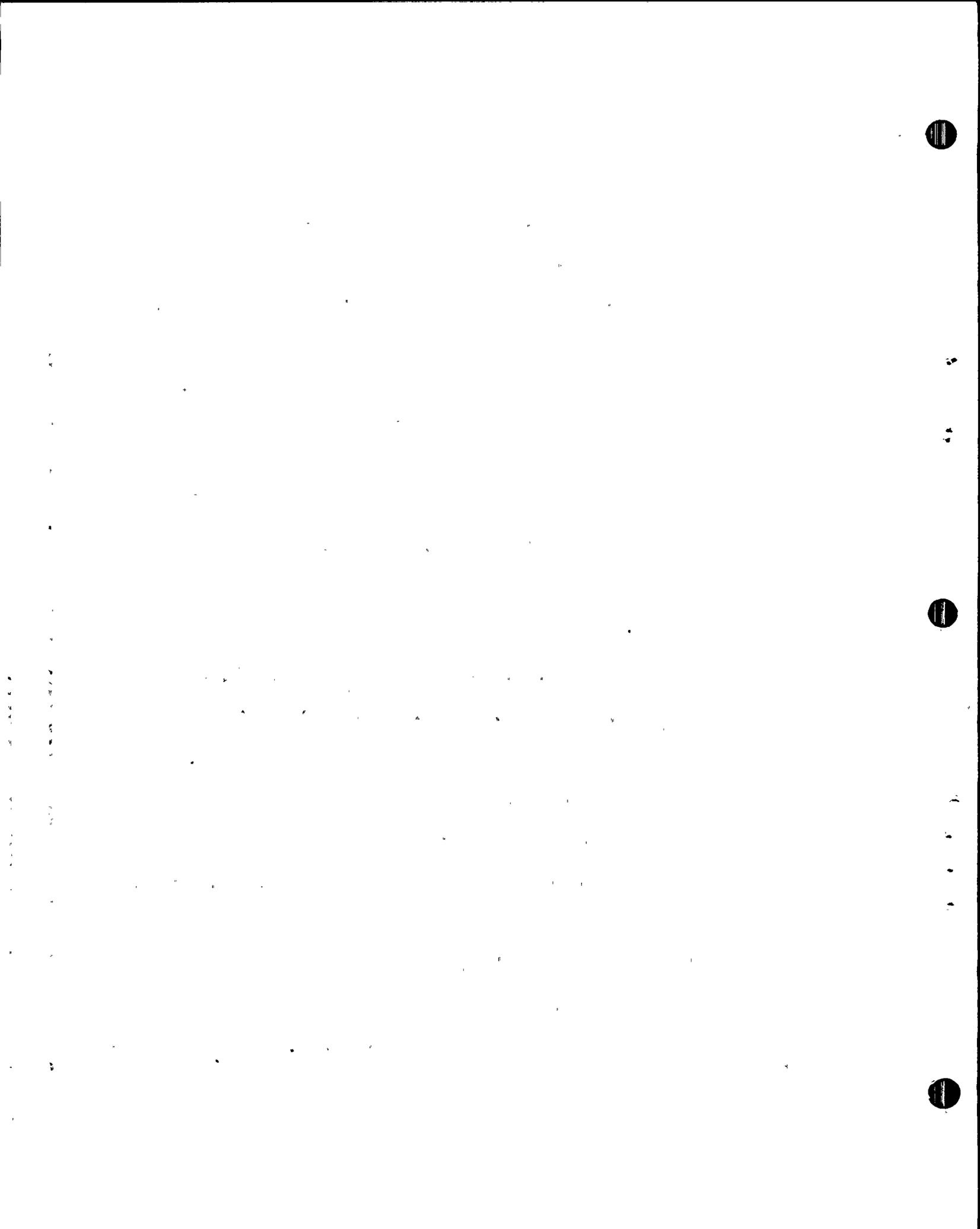
18 A Where?

19 Q No, were.

20 A Yes.

21 Q I'm sorry, I thought when that question was
22 asked before you said no in cross-examination, but I thought
23 there was some confusion there and that's why I asked the
24 question again.

25 A Okay. There are two purposes for this underground



wrb/agb6

1 storage tank. One is safety for the piping system connected
2 to the turbine generator building and the safety tank itself,
3 the two purposes of this analysis. And the piping system
4 connected to the turbine generator building is analyzed based
5 on the deformation, and the tank itself was analyzed based
6 on the stress induced.

7 Q And what were the results of the analysis?

8 A Both show safe. Earlier in this testimony, I
9 made myself clear about the factor of safety, 1.83, which is
10 based on stress.

11 Q And that's the tank itself?

12 A Right.

13 Q Fine.

14 MR. NORTON: I have no further redirect.

15 MRS. BOWERS: Mr. Kristovich?

16 MR. KRISTOVICH: I have a few questions.

17 RECROSS-EXAMINATION

18 BY MR. KRISTOVICH:

19 Q First of all, does the intake conduit rest on
20 bedrock?

21 A (Witness McLaughlin) Yes, the intake conduit
22 is confined on both sides and the bottom on rock.

23 Q Now Dr. Bluma, I believe you testified that the
24 figures in Joint Intervanors' Number 45, which is USGS Number
25 672, the figures on Page Three were not applicable.



1 MR. NORTON: Object, I believe it was the
2 velocities.

3 MR. KRISTOVICH: Well, the figures we were dis-
4 cussing, which were the velocity figures for the 7.5 magnitude
5 earthquake.

6 BY MR. KRISTOVICH:

7 Q Can you explain why they're not applicable?

8 A (Witness Blume) They do not apply to the Diablo
9 Canyon site because that's a rocky site, and the values in
10 672, many of them are from alluvial sites. Alluvium shakes
11 in velocity and displacement a lot more than rock, which is
12 not true for acceleration close in.

13 Q Well we'll give you our copy of USGS Number 672
14 and we'd like you to point out where in there it says the
15 figures are based on alluvial sites, the figures for velocity.

16 A The plots shown in 672 of magnitude versus dis-
17 tance.

18 Q We're talking about the velocity and Table
19 Two, Dr. Blume.

20 A I realize that.

21 MR. NORTON: We would ask that counsel quit
22 interrupting the witness and let him answer the question.

23 WITNESS BLUME: Figure 8 of 672 is a plot of
24 velocity in centimeters per second versus distance for a whole
25 group of earthquakes of magnitudes ranging from 5 up to 7.9,



wrb/agb8

1 and there's only a very few in this whole mass of data that
2 are on rock, I happen to know that whether I read 672 or not.
3 And I also happen to know that ground, as I said, shakas more
4 in velocity on alluvium than it does on rock.

5 Q I'd like to refer you to Page Three of this
6 document.

7 A Page Three?

8 Q Page Three, the right-hand column. I don't
9 know which paragraph specifically, but there are some under-
10 lined sentences. You might designate which paragraph it is,
11 and perhaps you could read it.

12 A Well the lower underlined --

13 Q Dr. Bluma, could you read the sentences you're
14 referring to?

15 A Well I want to first clarify. You've got two
16 underlined sections.

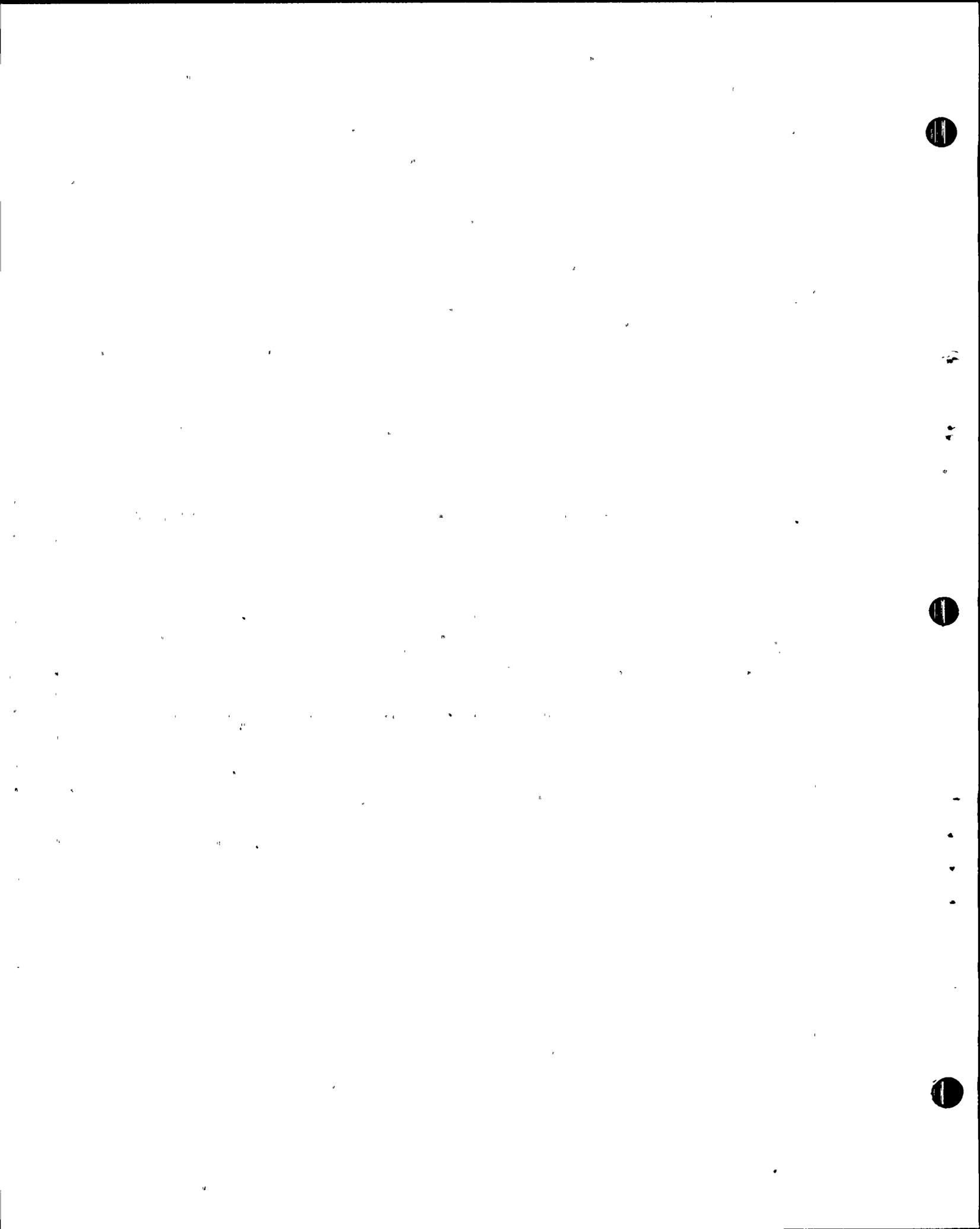
17 Q The bottom underlined section.

18 A The bottom underlined section reads as follows:

19 MR. NORTON: Excuse me, I unfortunately don't
20 have Intervenor's counsel's copy, and I'd like to know where
21 we're reading from.

22 MRS. BOWERS: Well your witness has --

23 MR. KRISTOVICH: Joint Intervenor's Number 45,
24 Page Three, the right-hand column. We don't have a copy
25 either.



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wrb/agb9

2 MR. NORTON: Well does everybody have the same
3 copy, because you talked about two sets of underlining in that
4 column and I only have one set of underlining, that's why I
5 thought maybe you had some additional underlining on your
6 copy that I don't have on mine.

7 MR. KRISTOVICH: That's correct. We just under-
8 lined something for Dr. Blume.

9 MR. NORTON: That's what I was trying to find out,
10 where it was.

11 WITNESS BLUME: It's in the lower right-hand
12 paragraph of Page Three of Document 672.

13 MR. NORTON: Okay. Thank you.

14 WITNESS BLUME: And they have underlined a portion
15 which I will now read:

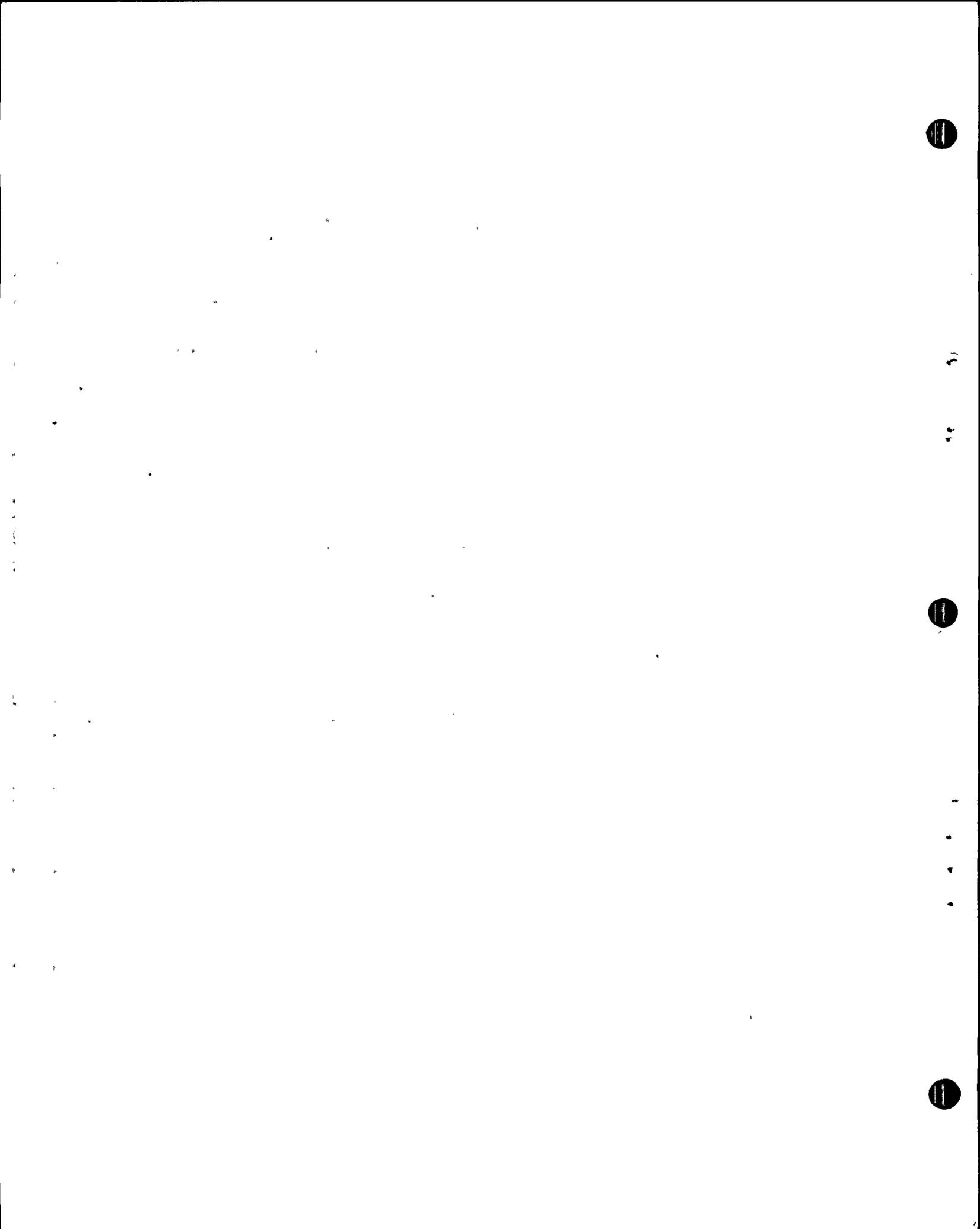
16 "They correspond to normal or average
17 geologic site conditions and are not intended to
18 apply where ground motion is strongly influenced
19 by extreme contrasts in the elastic properties
20 within the local geologic section."

21 End of underlined portion.

22 BY MR. KRISTOVICH:

23 Q So does this mean that the values in Table Two
24 are for an average site, then?

25 A (Witness Blume) Yes, and do not apply for extreme
conditions which is Diablo Canyon, an extreme condition.



1 wrb/agbl0

Q What do you mean by "extreme condition," Dr. Blume?

2 A Rock, as compared to typical alluvium.

3 MR. KRISTOVICH: No further questions.

4 MRS. BOWERS: Mr. Ketchen?

5 MR. KETCHEN: I have no further questions.

6 MRS. BOWERS: Well the Board has no further
7 questions.

8 MR. NORTON: WE have no more redirect.

9 MRS. BOWERS: Why don't we take a 10-minute break,
10 because we took one earlier.

11 What about this panel? Any objection to those
12 being excused who are not scheduled for later panels?

13 MR. KRISTOVICH: No objection.

14 MR. KETCHEN: No objection.

15 MRS. BOWERS: Well those panel members who are not
16 slated for later panels are excused.

17 (Witness panel excused.)

18 (Recess.)

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SWEL/wel
fls WRB.

1 MRS. BOWERS: Do you have your next panel, Mr.
2 Norton?

3 MR. NORTON: We have Mr. Steinhardt, who is here
4 now.

5 Basically, Mrs. Bowers, this testimony deals with
6 the placement on instrumentation within the facility that
7 will measure strong motions, et cetera. This presentation
8 was made to the ACRS and while it's not really related to
9 the safety of operation directly, we thought it would be
10 of interest to the Board to hear this presentation.

11 It's not going to be a two or three minute
12 summary. There's going to be a bunch of Vugraphs, and the
13 diagrams and so on are attached to the written testimony.
14 But we thought we'd have Mr. Steinhardt go through it. The
15 ACRS found it very helpful, and it also gives a pretty good
16 overview of the physical layout of the facility.

17 MRS. BOWERS: Has Mr. Steinhardt been sworn?

18 MR. NORTON: No, he has not.

19 Whereupon,

20 O. W. STEINHARDT

21 was called as a witness on behalf of the Applicant and,
22 having been first duly sworn, was examined and testified as
23 follows:

24 DIRECT EXAMINATION.

25 BY MR. NORTON:

Q Mr. Steinhardt, have you reviewed the professional



wel 2

1 qualifications that were submitted for you in this case-?

2 A I did.

3 Q And are they a true and correct copy of your
4 professional qualifications?

5 A Yes.

6 MR. NORTON: Mrs. Bowers, we would ask that they
7 be physically inserted in the record at this time.

8 MRS. BOWERS: Mr. Kristovich, do you have any
9 objection? This is just the qualifications.

10 MR. KRISTOVICH: Fine. No objection.

11 MRS. BOWERS: Mr. Ketchen?

12 MR. KETCHEN: No objection.

13 MRS. BOWERS: The professional qualifications
14 will be physically inserted in the transcript as if read.

15 (The document follows:)

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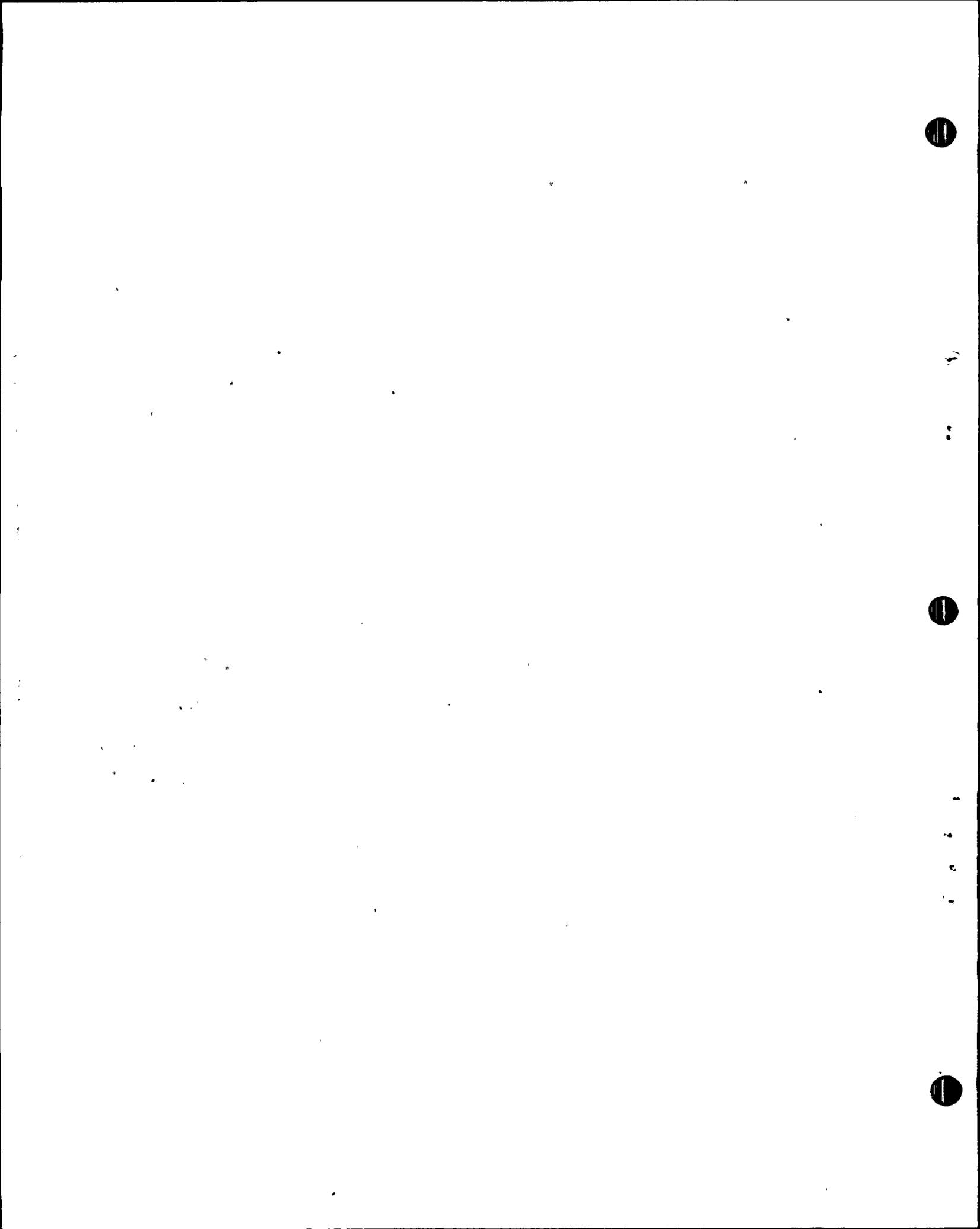
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1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

3 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

4 In the Matter of) Docket Nos. 50-275
5) 50-323
6 PACIFIC GAS AND ELECTRIC COMPANY)
7 (Diablo Canyon Nuclear Power) Applicants Ex. No. 7
Plant, Units No. 1 and 2)) December 1978

8 PROFESSIONAL QUALIFICATIONS
9 OF WITNESSES FOR
10 PACIFIC GAS AND ELECTRIC COMPANY

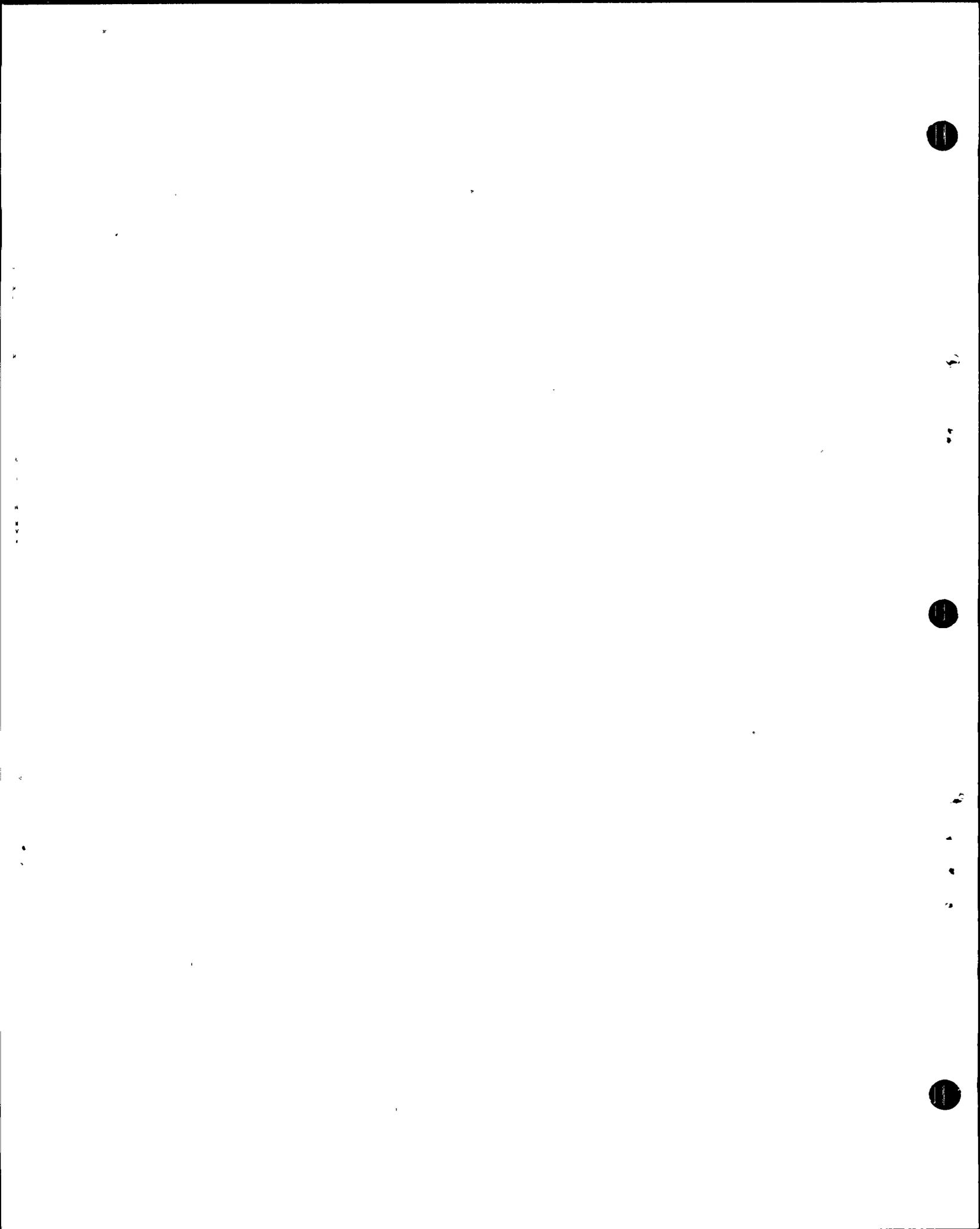
11 Name: Otto W. Steinhardt

12 Title or Position: Senior Civil Engineer

13 Degrees: B.S., U.S. Military Academy, 1944; M.S. (Civil
14 Engineering), State University of Iowa, 1949

15 Professional Experience: Joined PGandE in 1968 after 19
16 years with (a) U.S. Army, (b) Bethlehem Steel Co.,
17 (c) Howard-Needles-Tammen-and-Bergendoff Consulting
18 Engineers, (d) University of Arizona Civil Engineering
19 Department, (e) University of Utah Civil Engineering
20 Department.

21 At PGandE, coordinated structural design and
22 construction of the Auxiliary Building of Diablo
23 Canyon Power Plant (2 years), then (from 1971 to
24 date) worked on various aspects of design, procure-
25 ment and construction to improve the earthquake
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resistance capability of Company facilities.
Professional Civil Engineer, State of California.



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BY MR. NORTON:

Q Mr. Steinhardt, do you have any corrections to make to the written testimony at this time?

A In the middle of page 3, under "Containment Structure, Foundation Mat," in the line following the sub-title "Foundation Mat," delete "over 10," substituting 14.5.

On page 4, under the sub-title "2. Containment Exterior," in the first line following, "3.5 feet" should be changed to 3.67 feet..

On page 5, second line, after "Interior Concrete," the 3 should be changed to a 2.



wel 4

1 On the same sheet, second line above the sub-title
2 "Auxiliary Building," after the word "installed" insert
3 "at the top of a steam generator mounted" so that the sentence
4 now would read:

5 "Also, a PRA is installed at the top of a steam
6 generator mounted at Elev. 140 ft. on the Interior
7 Concrete."

8 On the same page, three-quarters of the way from
9 top to bottom --

10 Q We have line numbers, Mr. Steinhardt.

11 A Oh, yes. Line 20. After 100 ft), insert the
12 words "west end."

13 MR. KRISTOVICH: That's line 20?

14 THE WITNESS: 20.

15 On page 5, again, line 25, 3 should be changed
16 to 2.

17 On the same page, the last line, after "Building"
18 and before the period, insert the words, "and one at Elev.
19 60 ft."

20 On page 6, between lines 17 and 18, the sub-title
21 "Intake Structure," underscored, should be inserted, followed
22 by the statement:

23 "One PRA is installed near each pair of Class-1
24 pumps, at Elev. -2 ft."

25 MR. KRISTOVICH: Can you go over that one again,



wel 5

1 please?

2 THE WITNESS: Page 6, between lines 17 and 18,
3 "Intake Structure," "One PRA is installed near each pair of
4 Class-1 pumps --

5 MR. BRIGHT: Installed near each pair?

6 THE WITNESS: Excuse me.

7 Page 5, between lines 17 and 18, insert the
8 Sub-title, "Intake Structure," with an underscore, followed
9 by the statement:

10 "One PRA is installed near each pair of Class-1
11 pumps, at Elev. -2 ft."

12 On Figure 4, the last sheet, the capital letter
13 "P", designating PRA, should appear in the area of the 230 KV
14 switchyard, and near the center of the 500 KV switchyard.

15 BY MR. NORTON:

16 Q That doesn't make much sense, I don't believe,
17 Mr. Steinhardt. Could you try another way of explaining that
18 correction?

19 A Figure 4 shows the general layout of the plant,
20 and part of the figure designates an area where the 230 KV
21 switchyard is, and another one where the 500 KV switchyard
22 is.

23 A PRA is installed in each of those switchyards.

24 Q So you need a large "P" in the switchyard where
25 the arrow is, is that the idea?



1 A Correct.

2 Q Now, the 500 KV switchyard, I don't see any arrow.

3 A Well, the arrow has been omitted, but the
4 switchyard I think is clearly indicated. There's a sort of
5 rectangular area, and near the center of it there should be
6 a capital "P". I think the exact location of those "P's"
7 is not very relevant.

8 Q Is that all the corrections you have, Mr.
9 Steinhardt?

10 A Yes.

11 Q At this time, Mr. Steinhardt -- I appreciate
12 yours is not going to be a two or three minute summary, but
13 could you make your presentation at this time?

14 MRS. BOWERS: Are you going to ask that the
15 testimony go in?

16 MR. NORTON: I think following the presentation.

17 (Slide.)

18 THE WITNESS: There's a large number of strong
19 motion instruments installed at the plant site. They can
20 be described as consisting of a basic system and a
21 supplementary system.

22 The basic system consists of nine acceleration
23 sensors, and at this point I'd like to interpolate an
24 explanation.

25 Whenever one discusses strong motion instrumenta-
tion involving accelerometers, one expects to find a three



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1 axis accelerometer, two horizontals and one vertical,
2 typically.

3 There are reasons why in this case not all of
4 our instrument packages that contain accelerometers have
5 three axes, and so some of the instruments are three axis,
6 some are bi-axial, and in one case we have simply a single
7 vertical sensor -- vertical accelerometer. And I've used
8 the word "sensor" to indicate not an accelerometer, because
9 that might be misconstrued as bi-axial, but to indicate one
10 axis. And there may be three axes or two axes, or one.

11 So in the basic system we have nine acceleration
12 sensors, which happen to be three tri-axial instruments,
13 Kinematics.

14 We have one tri-axial response spectrum recorder,
15 which is a non-electrical device consisting of vibrating
16 reed type devices.

17 Six tri-axial peak recording accelographs. And
18 here we are not using any PRA's which are not tri-axial. So
19 I haven't listed them, the individual sensors contained
20 therein, separately.

21 One tri-axial earthquake force monitor, which
22 I'll allude to later.

23 One central recorder, which in the Kinematics
24 portion of the system -- in other words, the basic system --
25 is an analog recorder and a playback unit, which is also
analog.



wel 8

1 MRS. BOWERS: Are you going to have copies of
2 these transparencies?

3 MR. NORTON: They are, I believe, attached to
4 the testimony.

5 MRS. BOWERS: No, they are not. At least these
6 two are not.

7 MR. NORTON: Well, we can make them.

8 THE WITNESS: May I suggest these are almost word
9 for word excerpts from the prepared testimony, and it didn't
10 seem particularly useful to provide direct copies of anything
11 except the diagrams.

12 MR. NORTON: With that basis, I don't really
13 think we need to make copies for the record. In other words,
14 unless someone wants them. We can, but they're just a
15 written summary of the testimony shown on the screen.

16 But we'll make copies if people want them.

17 MRS. BOWERS: Mr. Kristovich?

18 MR. KRISTOVICH: It doesn't really matter.

19 MRS. BOWERS: Mr. Ketchen?

20 MR. KETCHEN: We don't think we need copies.

21 MRS. BOWERS: Fine. We won't have copies, then.

22 THE WITNESS: The supplemental system which is
23 being installed at the present time, whereas the basic system
24 has been in being for several years, the supplemental system
25 consists of 58 acceleration sensors. Terra Technology took



1 the bid on this portion of the job.

2 Seven tri-axial peak recording accelerographs,
3 which are the same instruments as mentioned previously in
4 the basic system.

5 One seismograph recorder. This one is digital,
6 and it's similar to the recorder mentioned in the basic
7 system.

8 And a playback plotter, analog, by Terra
9 Technology, but again similar to the playback unit mentioned
10 under the basic system.

11 (Slide.)

12 The basic system was installed for the purpose of
13 satisfying the requirements, and the requirements are to
14 have seismic instrumentation which will enable determination
15 of whether or not the seismic design basis of the plant have
16 been exceeded in case there is a seismic event which is felt
17 at the plant.

18 (Slide.)

19 The supplemental system is being installed in
20 response to a great amount of interest that was expressed
21 by the Advisory Committee to have the capability at this
22 plant of capturing a more than minimally adequate record of
23 whatever strong motion events might be felt at the plant.

24 Specifically, the supplemental system is
25 intended to more or less duplicate and expand the capabilities



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wel 10

1 to satisfy the requirements for which the basic system is
2 in being, but also to collect enough data in conjunction
3 with the basic system so that it will be possible to check
4 the analytic procedure that has been used in the design and
5 in the Hosgri evaluation of the plant.

6 In many cases we are depending on analytic
7 methods that can only finally be proven out if you have an
8 earthquake, and you are fortunate enough to record data at
9 sufficient points and sufficiently accurately so that you
10 can see whether the procedures actually worked out, and
11 also to evaluate the interaction of soil and structure, and
12 structure and structure through the soil.

13 Also, not on this slide, but in the prepared
14 testimony I mentioned that we hoped to have enough data to
15 evaluate the effects of the passage of seismic waves through
16 the large foundations of these structures.

17 (Slide.)

18 The sensors in the supplemental system, unlike in
19 the basic system, are equipped with a capability for
20 automatic gain ranging, which means that we can start out
21 with a very sensitive setting which will successfully record
22 strong motion that isn't very strong, such as from a distant
23 earthquake or from a small nearby earthquake.

24 This would have the unfortunate consequence of
25 immediately going off scale in case we had a nearby strong



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1 motion event.

2 And so we have in the supplemental system the
3 automatic feature that as soon as the sensor is about to go
4 off scale, an internal switch is flicked which decreases the
5 sensitivity and then if at the new lower level of sensitivity
6 the signal is still strong enough to possibly throw the
7 instrument off scale, the switch will flick to the still
8 lower level of sensitivity and thus, hopefully, will get
9 down to a low enough level so that we will have a good record
10 of the entire event without going off scale.

11 The basic system does not have this feature and,
12 therefore, it's not quite as sensitive as -- well, by several
13 multiples it's not as sensitive as this is.

14 On the other hand, we feel that it is sensitive
15 enough for the purpose of the basic system.

16 (Slide.)

17 Incidentally, with reference to the preceding
18 slide, in order that the switchover not introduce an
19 extraneous signal that might look like a large acceleration
20 peak that wasn't there, the supplemental system has a memory
21 of about two seconds. So that having switched, it can then
22 go back at least part of a second and pick up data that has
23 been temporarily stored, and thus eliminate the possibility
24 of this changeover transient unwanted record.

25 In order to start the system, both systems, we have



wel 12

1 triggers. There is a trigger on the base of the containment
2 of Unit 1, on the level of the operating deck of the
3 containment, Unit 1, and at the springline of the dome.

4 The springline of the dome is where the hemis-
5 pherical dome sits on the top of a cylinder. These triggers
6 initiate the recording of earthquake motion, and then keep
7 the recording system going until all significant response
8 has ended.

9 In other words, there's a threshold level that
10 starts the system, and then there's a preset integral where
11 the system goes on recording and will shut off unless the
12 triggering level is exceeded again during that period, upon
13 which a new preset run period starts.

14 (Slide.)

15 Once the system is triggered, the electrical
16 signals go from each sensor into a central recorder. The
17 central recorder for the basic system is in the control
18 room for the supplementary system. Due to the desire to
19 avoid undue congestion in the control room, the recorder is
20 situated at a floor level below there.

21 But in order that we be able to use the recorded
22 data with the maximum effectiveness, it's very important
23 that we be able to compare the time at which a peak occurred
24 at one location in the plant with the time at which a peak --
25 a comparable peak -- occurred elsewhere in the plant.



wel 13

1 And so on each record we have a timing signal,
2 and the timing signal is -- or will be -- common to the two
3 systems.

4 In order that we not lose our recording capability
5 in the unlikely event that the power supply to the plant is
6 knocked out and the plant has to stop generating electricity,
7 there is a battery supplied -- the manufacturer refers to
8 it as an uninterruptible supply of power. The batteries
9 supply the power to the system, and a trickle charger keeps
10 the batteries freshened up so that they can do the job.

11 In case of total loss of power the batteries are
12 sufficient to provide at least one hour of continuous
13 operation, which should be enough to capture all of the
14 significant aftershocks.

15 (Slide.)

16 The system functions quietly. Therefore, in order
17 that the operator in the control room know that an earthquake
18 has occurred and is being recorded, there is an annunciator
19 light -- not a sound system, because in case there is
20 actually a felt earthquake there will be plenty of other
21 sounds in the control room so that we don't want to add one
22 more sound.

23 But there will be a light, and this light will
24 go on whenever the recording is taking place, even if the
25 seismic event being recorded was too small to be felt.



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1 Of course if the event was a strong one, the
2 annunciation will not really be necessary, except to
3 reassure us that the system is going. But if it isn't
4 going, they will be too busy to do anything about it anyway.

5 It will be going.

6 Also, there is in the control room as part of the
7 basic system the earthquake force monitor, which automatically
8 records the peak acceleration felt by one of the sensors on
9 the base of the Unit 1 containment, and holds that informa-
10 tion on display, so that the operator can check to see what
11 the record shows.

12 If the operator needs to know more about these
13 accelerations, perhaps one other instrument in the system,
14 the playback unit, can be used to call forth a display of
15 the acceleration record --

16 (Slide.)

17 -- from any of the other instruments.

18 Now, the instruments I've alluded to are
19 displayed here schematically, and I have not tried to
20 distinguish which are the basic and which are the supplemental
21 system, but essentially it's all one system for this
22 purpose.

23 In the containment we have -- note the symbols.
24 The + with a circle around it, a tri-axial -- this says
25 tri-axial sensor. Actually it means three sensors. The



1 + without the circle means two sensors, and in each case one
2 of those sensors is vertical, if there are only two.

3 And then we have one sensor which is purely
4 vertical.

5 On the base of the Unit 1 containment we have
6 three tri-axial sensors which are actually distributed
7 around the perimeter of the base, although here it looks as
8 if they're in a straight line.

9 Additionally, at one point on that base we have
10 at the same location a response spectrum recorder, a peak
11 recording accelerograph, and a trigger.

12 Also at that elevation, but on the interior of
13 the containment, we have a vertical sensor which is located
14 here, because there's the possibility that this what looks
15 like a very rigid foundation mat might have some bending
16 and, therefore, the vertical accelerations near the center
17 might possibly be different from the vertical accelerations
18 around the perimeter.

19 To verify that they are or are not, we can
20 consult the vertical sensor.

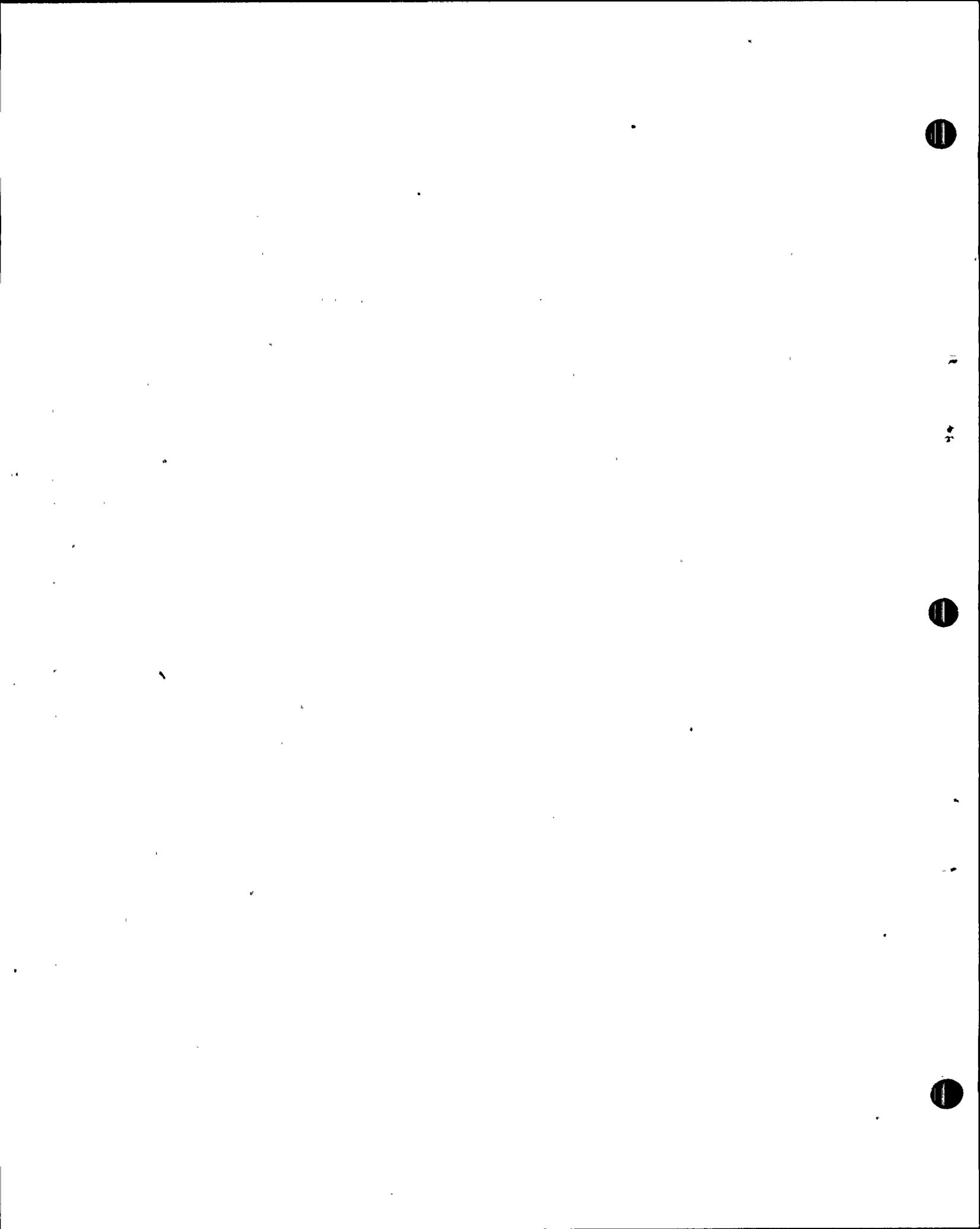
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1 Also to compare the signals received on the
 2 foundation of Unit 1 with the signals received on the founda-
 3 tion of Unit 2, we have three biaxial sensors installed around
 4 the perimeter of the base of Unit 2. Because of the similarity
 5 of the two structures it didn't seem necessary to duplicate
 6 further the instrumentation in Unit 2 that's in Unit 1.

7 On the operating deck level of the containment
 8 -- well, first let me cover the exterior of Unit 1.

9 Besides the triaxial instruments on the base, we
 10 have three triaxial instruments distributed around the spring
 11 line of the dome, and we have a triaxial instrument at the top
 12 of the dome. Also at the top of the dome is a PRA, intended
 13 primarily to check the triaxial instruments, or perhaps to
 14 pick up a record in case the electrical system for some
 15 reason should fail, because PRA is a nonelectrical device.

16 On the spring line -- and these are inside the
 17 shell of the structure, but on the wall -- one of the instru-
 18 ment locations is also a trigger.

19 Inside the containment, Unit 1, on the operat-
 20 ing deck level there are three triaxial instruments on the
 21 interior concrete, and there are two biaxial instruments on
 22 the slab at the top of the annulus, the steel annulus struc-
 23 ture. And additionally there is a PRA which here I have
 24 shown at elevation 140. But actually this PRA is installed
 25 on a piece of equipment which has its feet at elevation 140,



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1 but in fact the top, the steam generator number one is about
2 25 feet higher than that.

3 And then one of the instrument locations at
4 elevation 140 is part of the triggering system.

5 MRS. BOWERS: Mr. Steinhardt, this appears to be
6 identical to Figure 1 in your testimony.

7 THE WITNESS: Yes.

8 MRS. BOWERS: But that identification doesn't
9 show at the bottom. But it is identical, is that right?

10 THE WITNESS: It is intended to be identical.

11 I would like to apologize for my sense of
12 economy. I had these slides made up for the ACRS presenta-
13 tion, at which time they were not designated by figure
14 numbers. And I'm trying to reuse them rather than have them
15 remade.

16 MRS. BOWERS: Very commendable.

17 (Laughter.)

18 (Slide.)

19 THE WITNESS: A slide that should be labeled
20 Figure 2 shows very schematically the auxiliary building. For
21 simplicity of reading, I've omitted a few important features.
22 For instance, the fuel handling building which stands on top
23 of the structure here is completely omitted. And rather
24 than showing all kinds of floor plans and cross-sections,
25 I've tried to use X-ray vision to get into the structure and



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1 show the instrumentation.

2 The lowest hold of the auxiliary building is at
3 about elevation 55. The lowest floor level normally is at
4 elevation 60. And approximately at elevation 60, although
5 I think it's actually at elevation 64, is a triaxial sensor.
6 And then directly above it on the -- let's see. I think
7 that's the east end -- on the east end of the structure
8 directly above it at elevation 100 is a triaxial sensor. And
9 then at that same elevation at the west end is a triaxial
10 instrument. And at that same elevation at the northeast end
11 of the building is a triaxial instrument.

12 The idea, as you can guess, is to try to check
13 from top to bottom and from side to side, from end to end,
14 with a minimum number of instruments, because this is a fairly
15 expensive system we're talking about, but to pick up enough
16 data to indicate differences of response at the different
17 elevations and different locations at the same elevation.

18 Elevation 100 was selected as the one to put most
19 of the money on because in this complicated building we have
20 foundation at elevation 55, elevation 60, at elevation 85,
21 and elevation 100. It's very difficult to determine what
22 was a good best location. But elevation 100 seemed quite
23 appropriate.

24 Supplementing the triaxial instruments are some
25 peak recording accelerographs, one at each end of the top floor.



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1 of the concrete portion of the auxiliary building at eleva-
2 tion 140, one here and one here.

3 (Indicating.)

4 And then this sketch shows a PRA, which it was
5 subsequently decided would be better placed elsewhere. And
6 so perhaps I should have corrected this figure; I didn't do
7 so.

8 This P should appear down here at elevation 60
9 at the west end of the building corresponding to the triaxial
10 accelerometer which is at that elevation at the east end.

11 BY MR. NORTON:

12 Q We should have the record show that when you
13 said "this P should be moved" to a certain area, the area
14 you indicated I think is sufficiently identified in the
15 record. But when you said "this P" I take it it was the P
16 that was approximately -- from the words "control room" -- at
17 about the, oh, ten o'clock position from that word.

18 A Yes. Thank you, Mr. Norton.

19 The P which was intermediate along the line which
20 has three Ps on it is the one which should be displaced to the
21 lowermost elevation of the auxiliary building at the west
22 end.

23 (Slide.)

24 In the basic system the turbine building was
25 ignored because it was considered not a class 1 structure.



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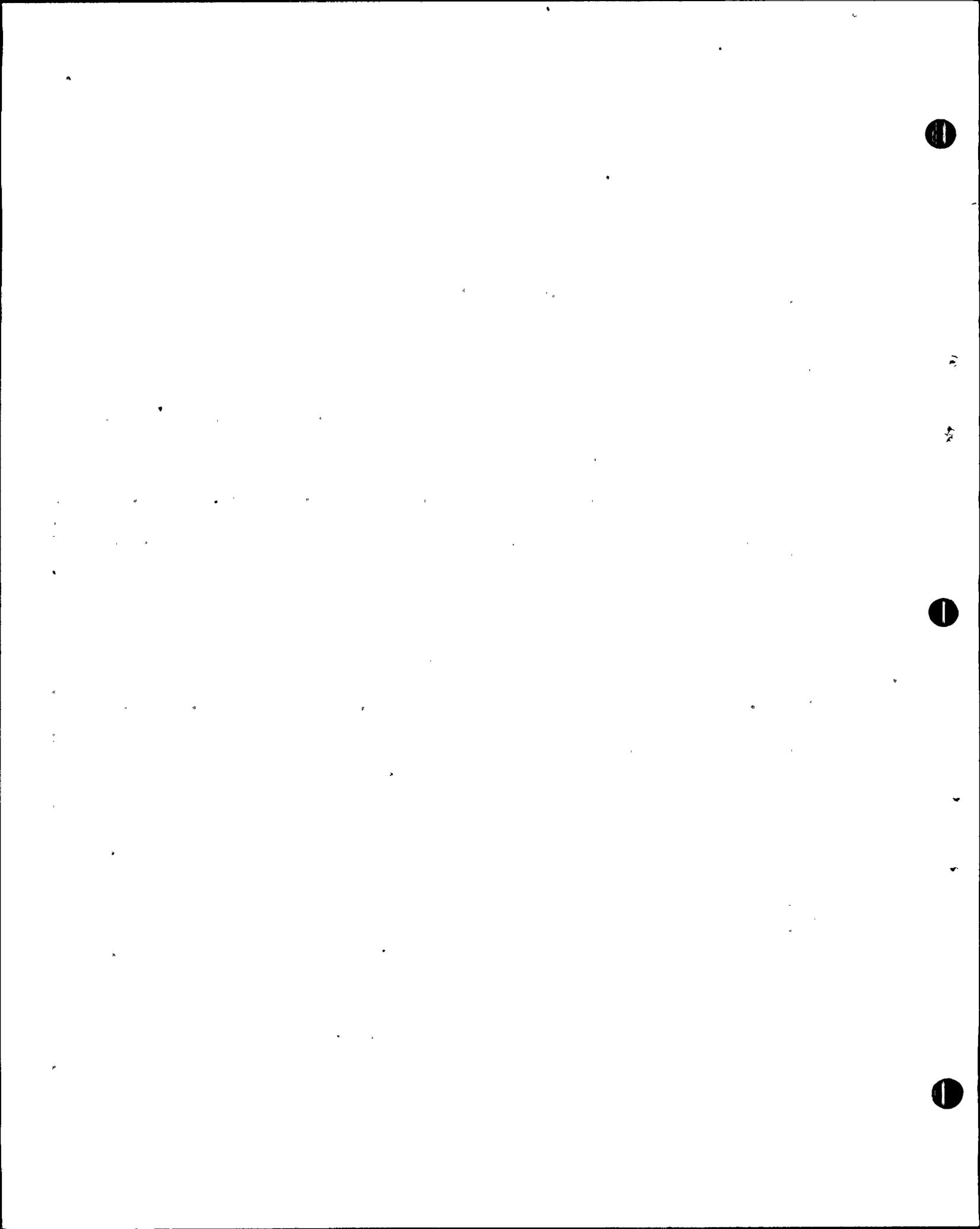
1 Whether it is now considered a class 1 structure or not is
2 irrelevant. It is certainly considered an important structure
3 from the viewpoint of collecting an adequate amount of data.
4 And so a fairly extensive amount of instrumentation is going
5 into that.

6 In order to test the response of the turbine
7 building from end to end, because of the great distance
8 from one end to the other, we have a triaxial accelerometer
9 at the north end of Unit 1 and a triaxial accelerometer at
10 the south end of Unit 2 at elevation 85. And then, just to
11 pick up a useful bit of information, approximately half-way
12 between we have a PRA at elevation 85.

13 The response of the structure is of some
14 importance, not quite as much importance as catching the
15 variations or possible variations across the foundation level.
16 And so at elevation 140, the turbine deck, we have a biaxial
17 accelerometer at one end, the north end. And for economy's
18 sake, at the other end, simply a PRA to pick up a comparable
19 bit of data, so that we can check what should be essentially
20 the same amplifications from top to bottom at that end as
21 this end.

22 And then, because at elevation 119 we have the
23 Class one equipment which is in this structure, a PRA is pro-
24 vided in the Unit 1 area.

25 MRS. BOWERS: And that was Figure 3 in your direct



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1 testimony, is that correct?

2 THE WITNESS: That's correct. Thank you.

3 (Slide.)

4 And now we come to what should be Figure 4.

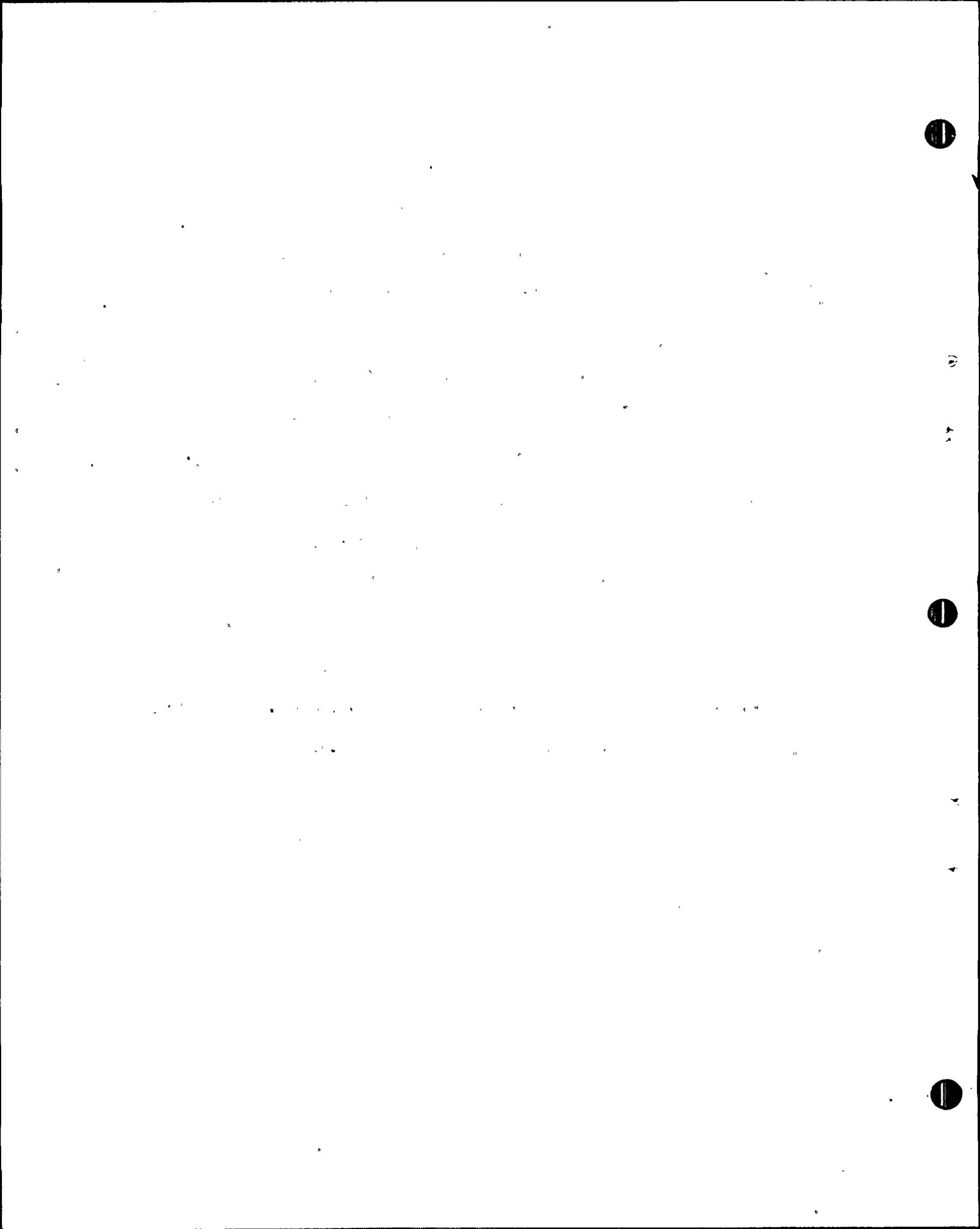
5 Basically this figure is intended to show the
6 free field instruments. One triaxial instrument is installed
7 near the reservoirs. This figure does not quite correctly
8 show where that instrument is. In fact, the triaxial instru-
9 ment should be shown between the reservoirs -- well, let's
10 see -- east of the line -- well, slightly east of the reservoirs
11 rather than northwest of them as shown here -- rather than
12 north of them it should be southeast of the reservoirs.

13 The other two triaxial free field instruments
14 are correctly shown, one not far from the construction ware-
15 house and batch plant, and one near the intake structure but
16 up on the hill behind the intake structure, not far from the
17 meteorological tower, which is at that location.

18 (Indicating.)

19 These instruments are placed far enough from the
20 plant so that the influence of the presence of the massive
21 buildings of the plant will not be felt at those locations.

22 Additionally, I've used this figure to show that
23 there are two PRAs in the intake structure mentioned in the
24 correction I posted to the written testimony earlier. And
25 there are two PRAs in the switchyard, that is one in the



mpb7 1 230 kv switchyard and one in the 500 kv switchyard, again a
2 correction which I mentioned for Figure 4 earlier.

3 That concludes my presentation.

4 MR. NORTON: We would ask at this time that
5 Mr. Steinhardt's testimony be placed in the record as though
6 read.

7 MRS. BOWERS: Mr. Kristovich?

8 MR. KRISTOVICH: Well, I had originally intended
9 to make a motion to strike Mr. Steinhardt's testimony as not
10 being relevant to any of the contentions before the Board.
11 But after Mr. Norton's preamble, I have no objections.

12 MRS. BOWERS: Mr. Ketchen?

13 MR. KETCHEN: No objection.

14 MRS. BOWERS: Well, the testimony will be
15 physically inserted into the transcript as though read.

16 (The Testimony of O. W. Steinhardt

17 follows:)

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1 TESTIMONY OF
2 O. W. STEINHARDT
3 ON BEHALF OF
4 PACIFIC GAS AND ELECTRIC COMPANY
5 DECEMBER 4, 1978
6 DOCKET NOS. 50-275, 50-323

7 SEISMIC INSTRUMENTATION SYSTEMS

8 GENERAL DESCRIPTION

9 Seismic instrumentation consists of a Basic System
10 installed in 1974 to meet the minimum requirements of Regu-
11 latory Guide 1.12 and a Supplemental System installed in
12 1978.

13 The Basic System consists of:

14 9 acceleration sensors (3 triaxial instruments)

15 Kinometrics FBA-3

16 1 triaxial Response Spectrum Recorder,

17 Engdahl PSR1200.

18 6 triaxial Peak Recording Accelerographs, Terra

19 Technology PRA-103

20 1 triaxial Earthquake Force Monitor, Kinometrics

21 EFM-1.

22 1 Central Recorder (analog), Kinometrics SMA-3

23 1 Playback Unit (analog), Kinometrics SMP-1

24 The Supplemental System consists of:

25 58 acceleration sensors (15 triaxial instruments,

26 6 biaxial, 1 uniaxial), Terra Technology SA



2

7



4

5



1 7 triaxial Peak Recording Accelerographs, Terra
2 Technology PRA-103

3 1 Seismograph Recorder (digital), Terra Technology,
4 DCS 302

5 1 Playback Plotter (analog), Terra Technology SMR
6 102

7 The purpose of installing the Supplemental System,
8 which is beyond the minimum required to satisfy regulatory
9 requirements, is to collect enough data in the event of an
10 earthquake affecting the plant site to:

- 11 1. Evaluate the effect of large foundations on
12 the passage of seismic waves.
- 13 2. Provide information on structure-soil-structure
14 interaction.
- 15 3. Check the dynamic structural analysis procedure
16 by determining the contribution of various modes to the
17 response of the structure at various locations.

18 The sensors in the Supplemental System have automatic
19 gain ranging capability, which insures that both strong and
20 weak seismic events will be fully recorded. Also, each
21 instrument has a memory window of approximately 2 seconds so
22 that a short-term averaging triggering program can be used
23 and filtering of ambient noise from the seismic event records
24 can be done.

25 Triggering is accomplished, in the Unit 1 Contain-
26 ment Structure, at the following locations:



10

45



7

2



- 1 1. base
- 2 2. operating deck
- 3 3. springline of dome.

4 These locations were selected to provide for both initiating
5 the recording and keeping it going until all significant
6 response has ended.

7 The instrumentation described herein satisfies the
8 intent of Section 5 of the 1977 draft of ANSI 18.5 (Reference 1)
9 and considerably exceeds the minimum requirements of that
10 document.

11 STRUCTURE ARRAY

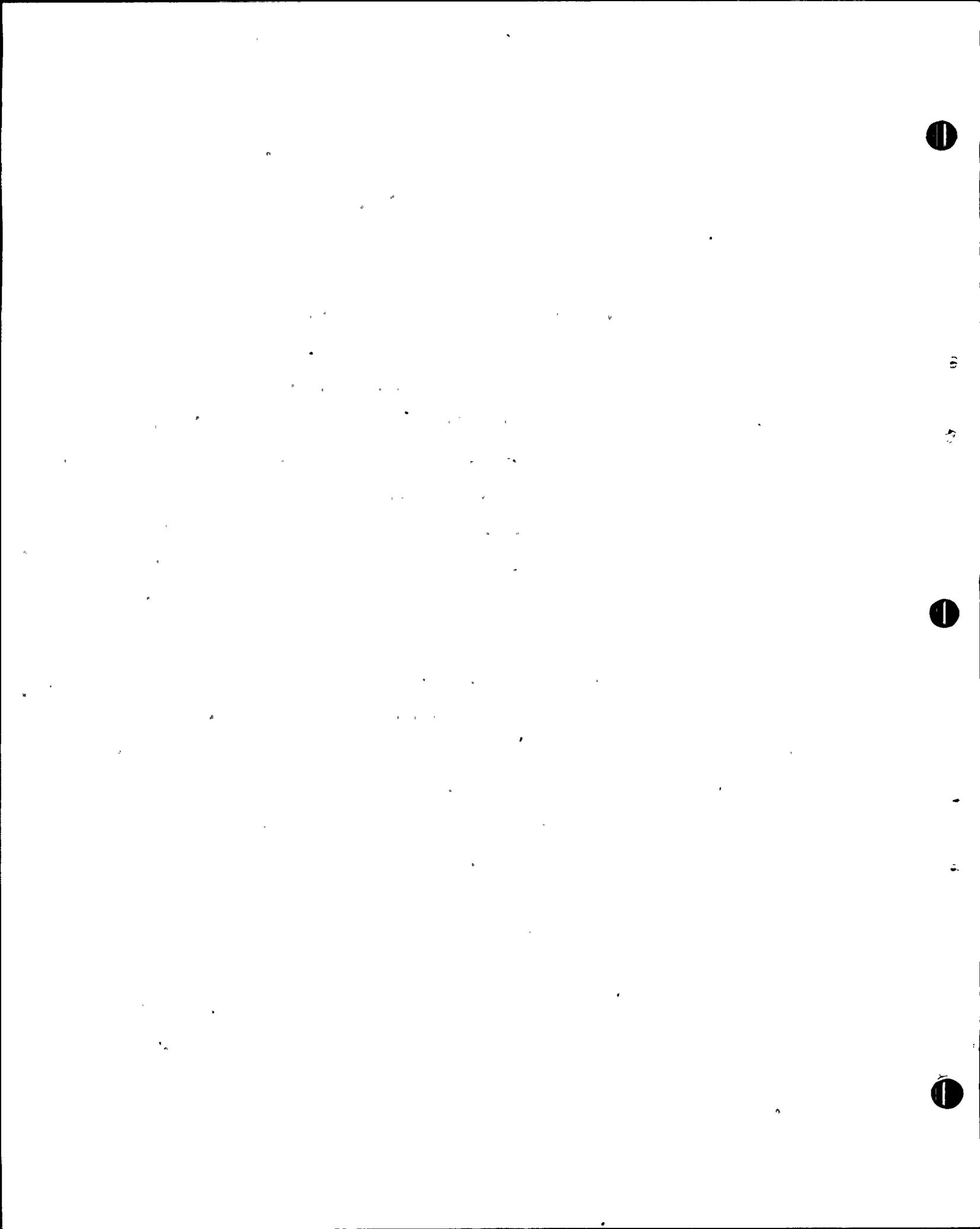
12 Containment Structure

- 13 1. Foundation Mat (Units 1 & 2)

14 The foundation mat is over 10 feet thick and is
15 expected to behave as a rigid disc. However, there is a
16 drop section about 30 feet deep in the center of the mat.
17 This could result in differences between the vertical accel-
18 erations at the edge of the drop section and those in the
19 rest of the mat; therefore, a vertical sensor is installed
20 near the edge of the drop section.

21 The foundations of Units 1 and 2 are instrumented
22 as follows (see Figure 1):

23
24
25
26



	<u>Unit 1</u>	<u>Unit 2</u>
1		
2	a. Foundation mat (lip,	3 triaxial
3	Elev. 89 ft)	3 biaxial--
4		horizontal
5	b. Foundation mat	1 uniaxial--
6	(interior, Elev. 91 ft)	vertical

7 Also, a triaxial Response Spectrum Recorder and a triaxial
8 Peak Recording Accelerograph (PRA) are installed at Elev.
9 89 ft. on the Unit 1 Containment foundation mat.

10 2. Containment Exterior (Unit 1)

11 The Containment Exterior is a 3.5 ft thick cylin-
12 drical shell with a 2.5 ft thick dome (see Figure 2). The
13 response of the shell is monitored to identify the contribution
14 of different modes of response. There are three circumferential
15 (breathing, torsion and beam) and two longitudinal modes
16 which account for most of the response of the exterior
17 shell. These modes are monitored with the following instru-
18 mentation scheme (see Figure 1):

- | | | |
|----|--------------------------|------------|
| 19 | a. At springline of dome | 3 triaxial |
| 20 | (Elev. 231 ft) | |
| 21 | b. Top of dome (next to | 1 triaxial |
| 22 | vent, Elev. 305.5 ft) | |

23 3. Containment Interior (Unit 1)

24 The Containment Interior is made up of a concrete
25 structure, and a steel annular structure topped by a concrete
26 slab. Response is monitored both in translation and in



1 torsion by the following instrumentation (see Figure 1):

2 a. Interior Concrete 3 triaxial

3 (Elev. 140 ft)

4 b. Annulus (Elev. 140 ft) 2 biaxial--

5 horizontal and

6 vertical

7 Also, a PRA is installed at Elev. 140 ft. on the Interior
8 Concrete.

9 Auxiliary Building

10 The Auxiliary Building is a stiff box structure
11 housing Class 1 equipment and service areas for both Units 1
12 and 2. The building is instrumented as follows (see Figure 2):

13 Foundation (Elev. 60 ft) 1 triaxial

14 east end

15 Floor slab and partial 1 triaxial

16 foundation (Elev.

17 100 ft), east end

18 Floor slab and partial 1 triaxial

19 foundation (Elev.

20 100 ft)

21 Floor slab and partial 1 triaxial

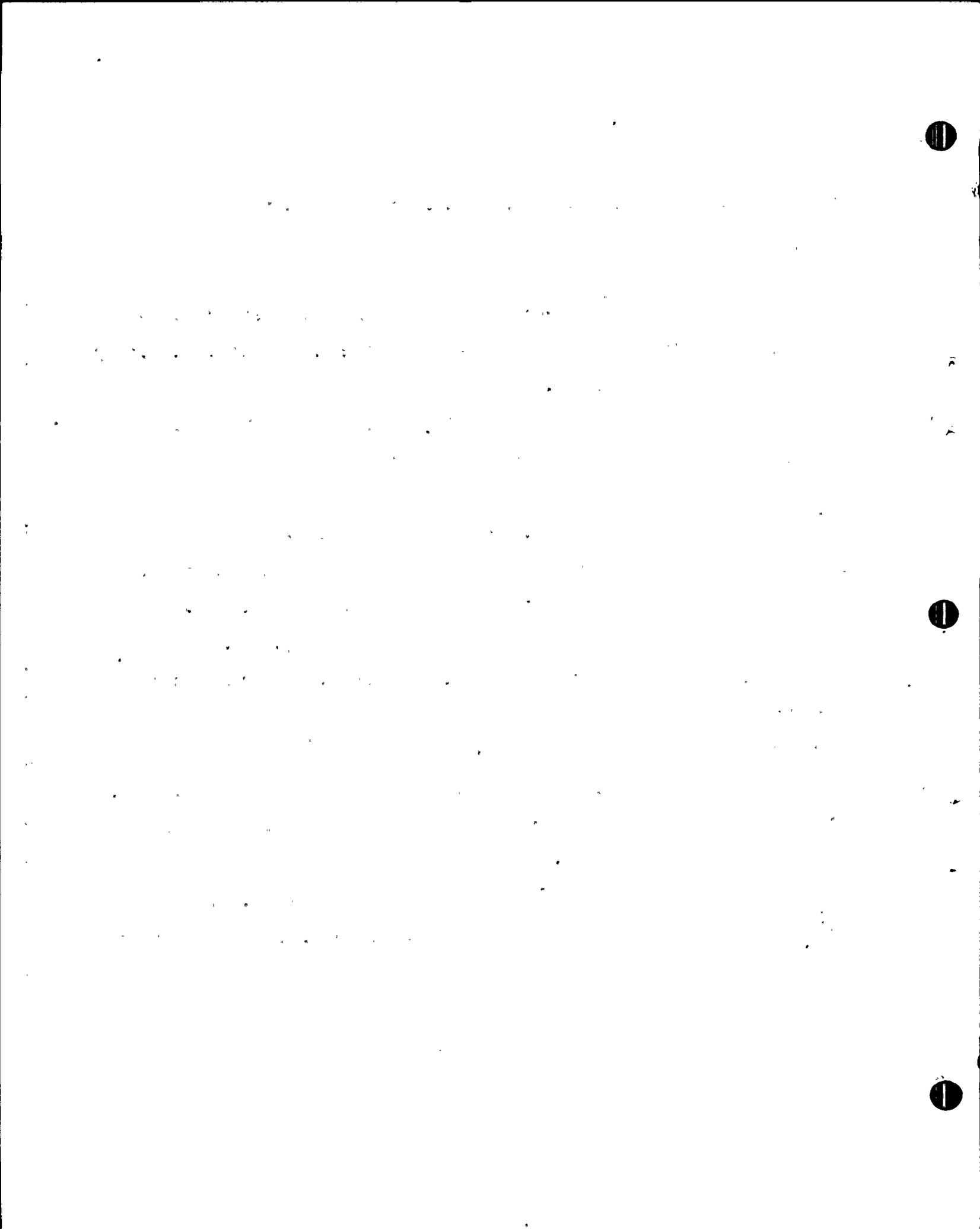
22 foundation (Elev.

23 100 ft), north end of

24 Fuel Bldg.

25 Also, 3 PRA's are installed at Elev. 140 ft. of the Auxiliary.
26 Building.





1 One PRA is installed near the 230 kV switchyard
2 control building and one PRA is near the center of the
3 500 kV switchyard.

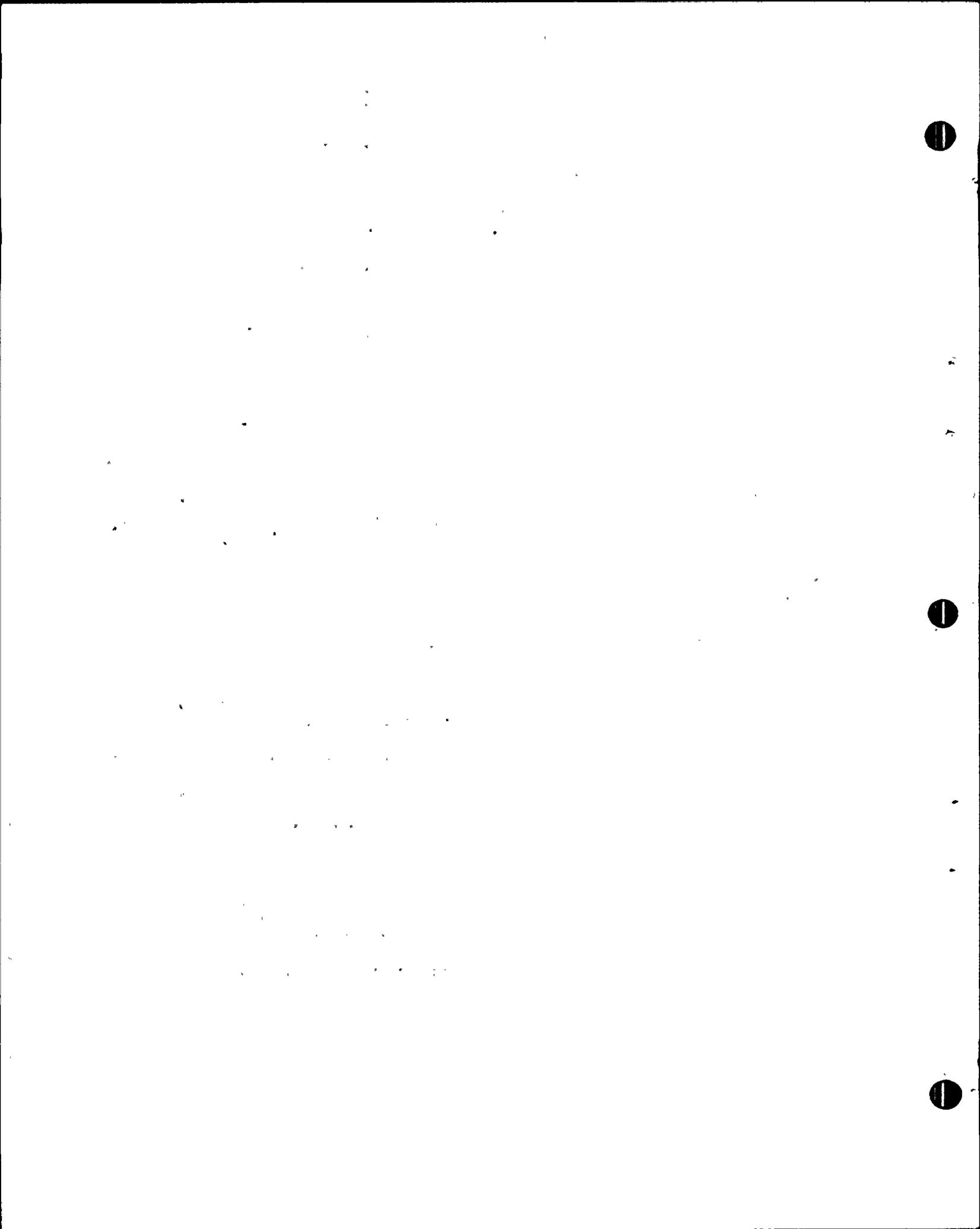
4 RECORDING SYSTEMS

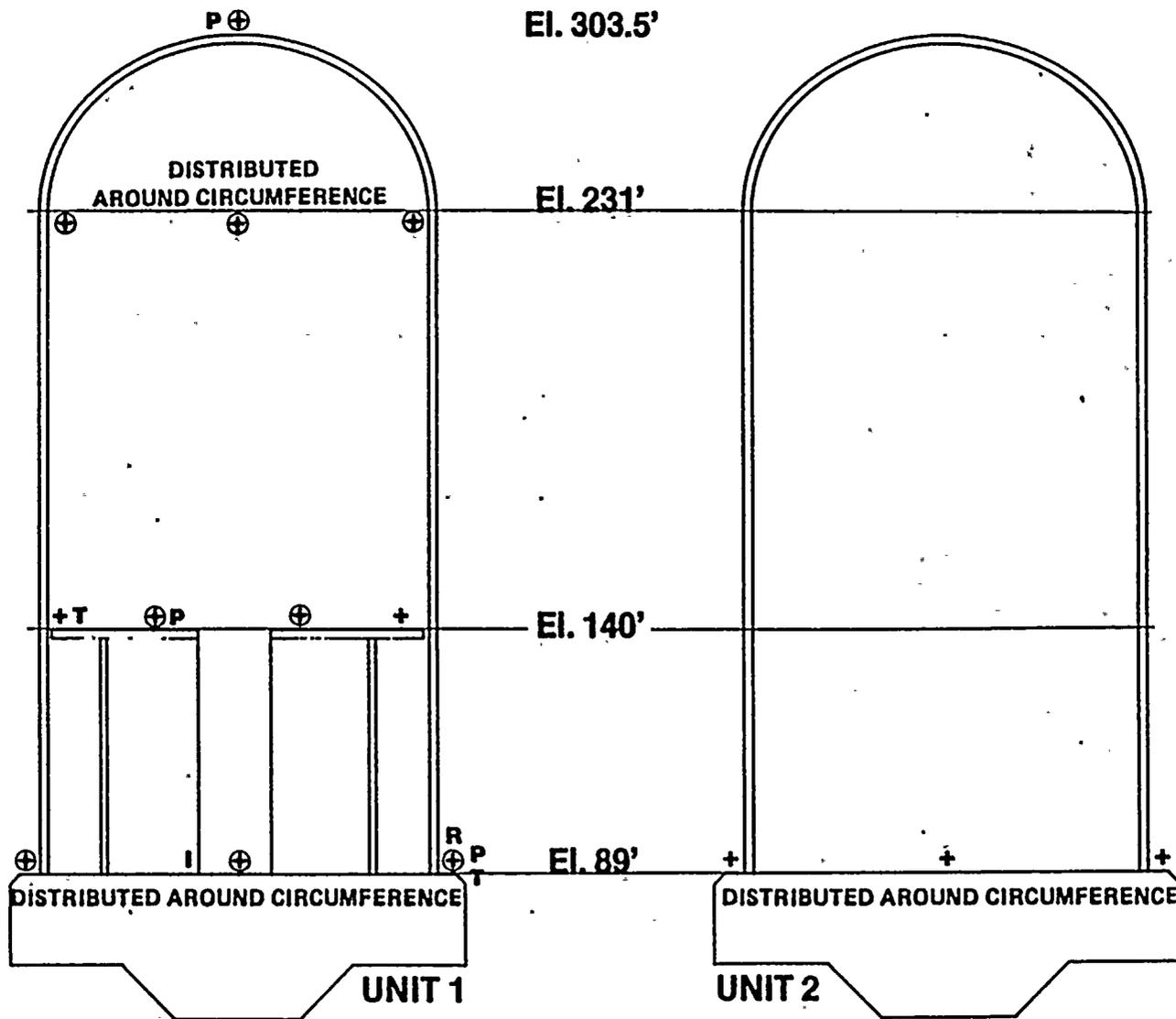
5 A central recording and playback system is installed
6 in the Control Room for the Basic System and another recording
7 and playback system is part of the Supplementary System.
8 Power supply is provided for all instruments by batteries
9 backed up by a float charger connected to the plant's AC
10 power supply.

11 Annunciation is made, in the Control Room, of
12 maximum acceleration in each of the 3 orthogonal sensors of
13 one of the triaxial instruments on the foundation of Unit 1
14 Containment. This feature utilizes an Earthquake Force
15 Monitor mounted atop the recording-and-playback cabinet of
16 the Basic System.

17 REFERENCES.

- 18 1. ANS-2 Subcommittee, Earthquake Instrumentation
19 Criteria for Nuclear Power Plants, Draft 1, ANSI N18.5-1974 --
20 Revision 1, January 24, 1977.
21 2. USNRC Regulatory Guide 1.12 For Nuclear Power
22 Plants - Revision 1, April 1974, Instrumentation for Earthquakes.



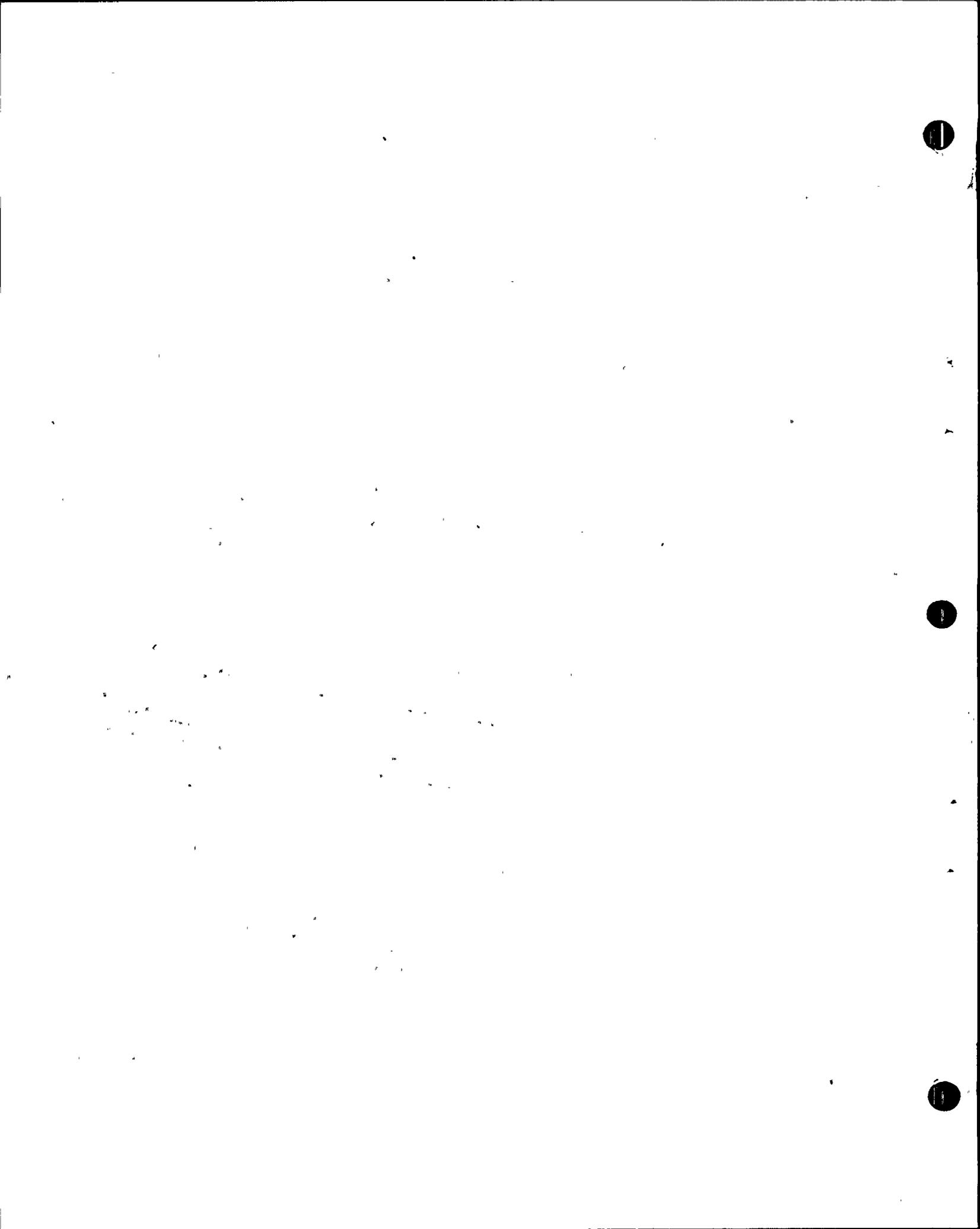


LEGEND

- I VERTICAL
- + BIAXIAL
- ⊕ TRIAXIAL
- P PRA
- R RSR
- T TRIGGER

**SEISMIC INSTRUMENTATION
 CONTAINMENT STRUCTURE
 DIABLO CANYON UNITS 1 & 2**

FIGURE 1



LEGEND

I VERTICAL

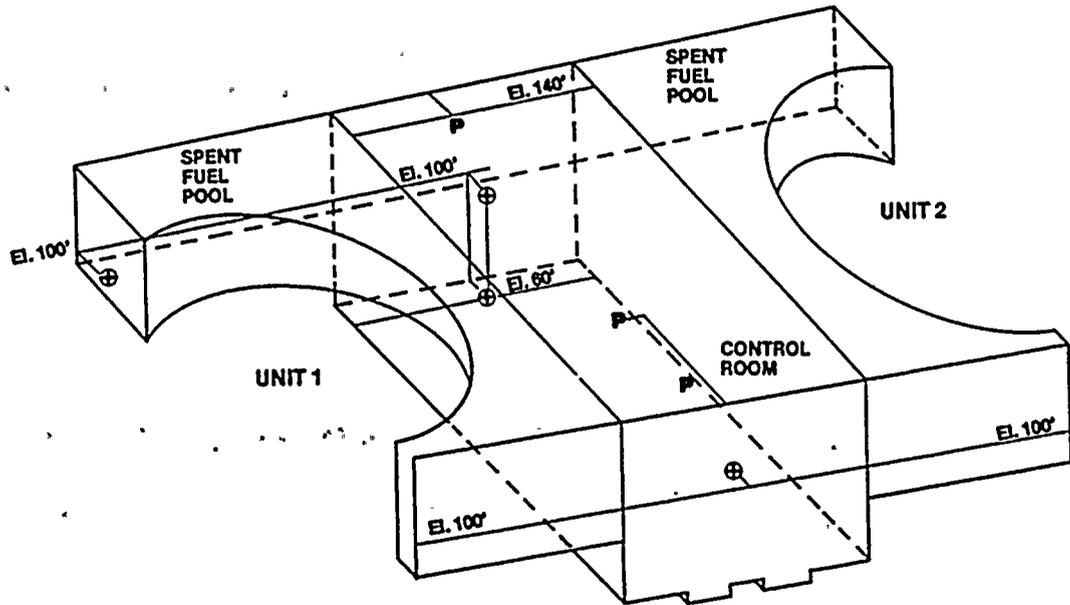
+ BIAXIAL

⊕ TRIAXIAL

P PRA

R RSR

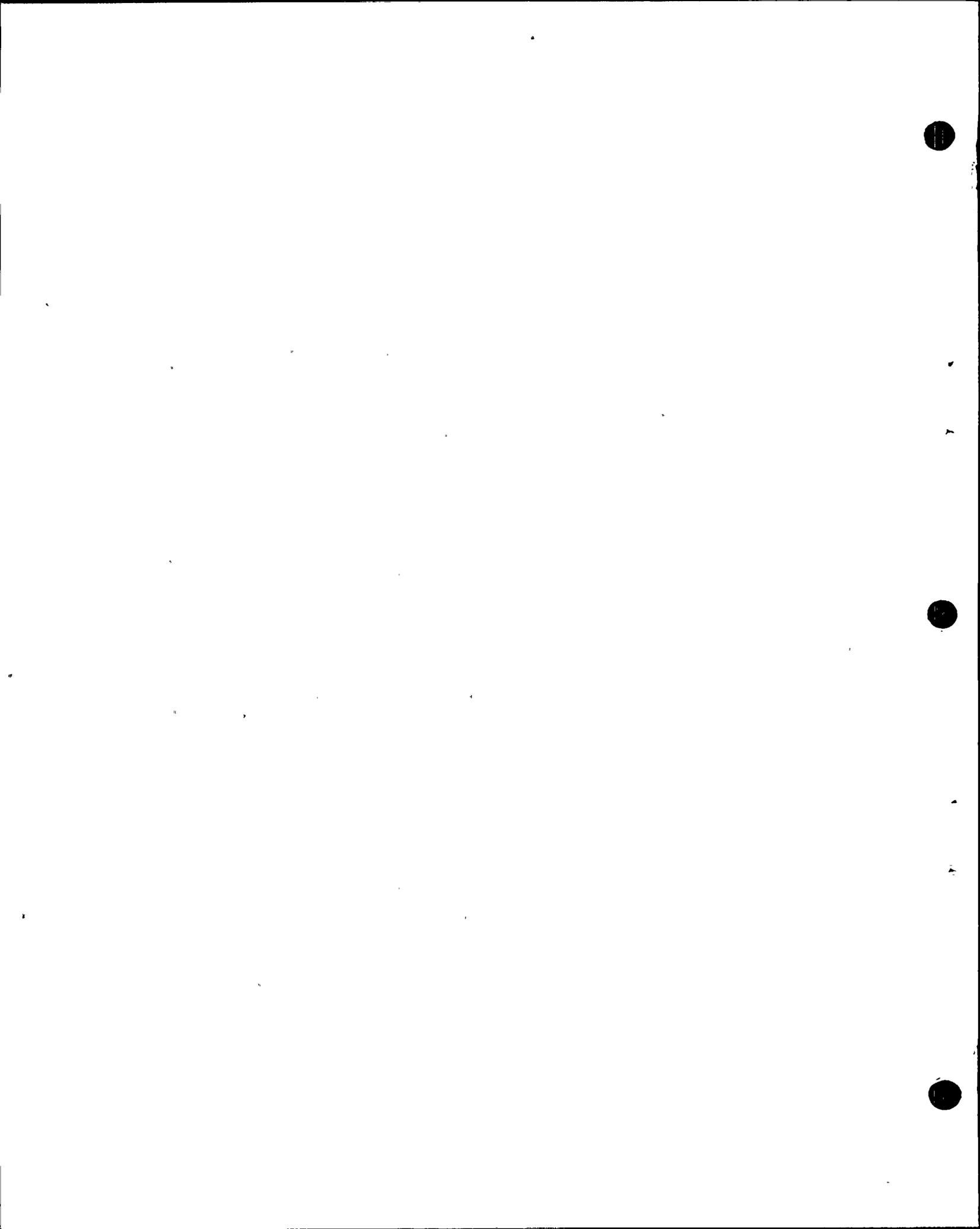
T TRIGGER

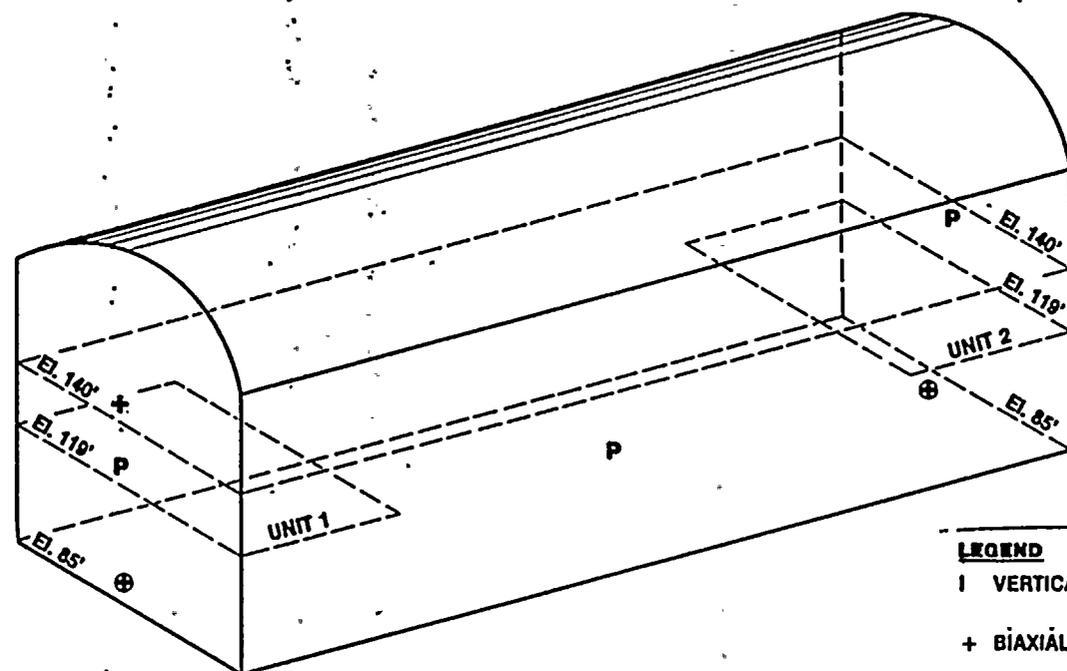


**SEISMIC INSTRUMENTATION
AUXILIARY BUILDING
DIABLO CANYON UNITS 1 & 2**

FIGURE 2

STEINHARDT





**SEISMIC INSTRUMENTATION
TURBINE BUILDING
DIABLO CANYON UNITS 1 & 2**

FIGURE 3

LEGEND

| VERTICAL ..

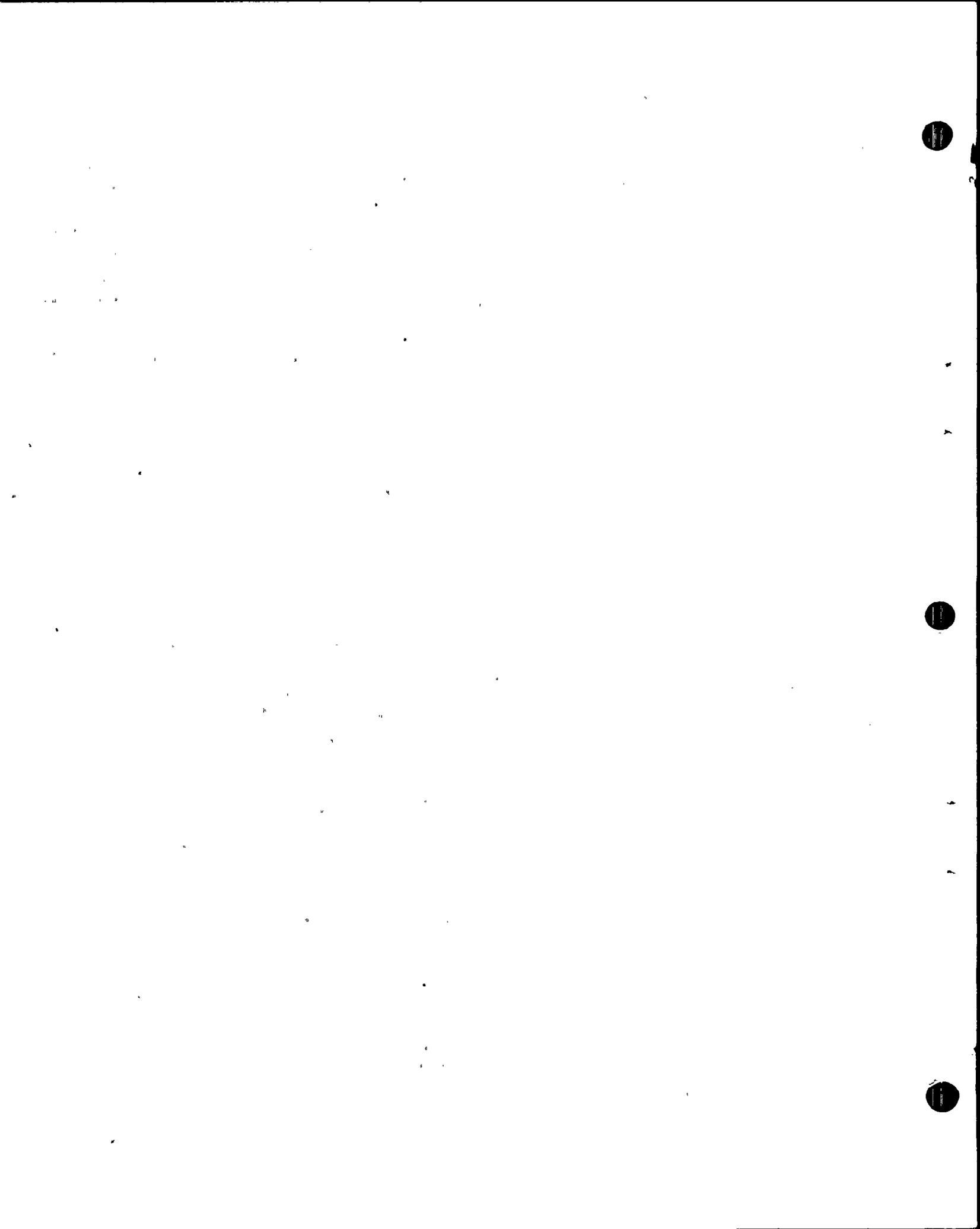
+ BIAXIAL

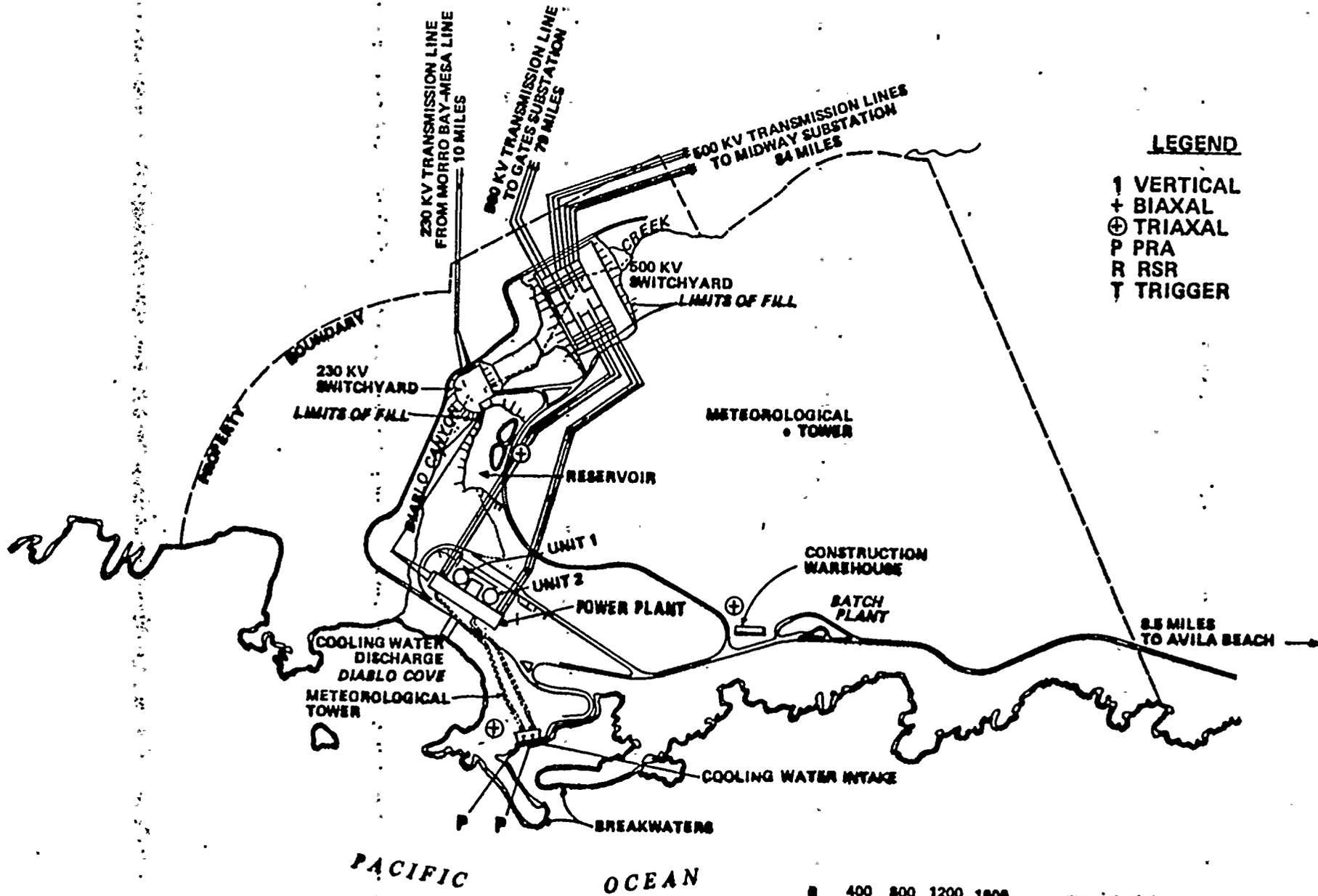
⊕ TRIAXIAL ..

P PRA

R RSR

T TRIGGER





UNITS 1 AND 2
DIABLO CANYON SITE

**SEISMIC
INSTRUMENTATION**

FIGURE 4
STEINHARDT



mpbl

1 MR. NORTON: We would pass Mr. Steinhardt for
2 cross-examination at this time.

3 MRS. BOWERS: Mr. Kristovich?

4 CROSS-EXAMINATION

5 BY MR. KRISTOVICH:

6 Q Mr. Steinhardt, is the seismic instrumentation
7 system in accordance with all aspects of Provision one of
8 Reg Guide 1.12?

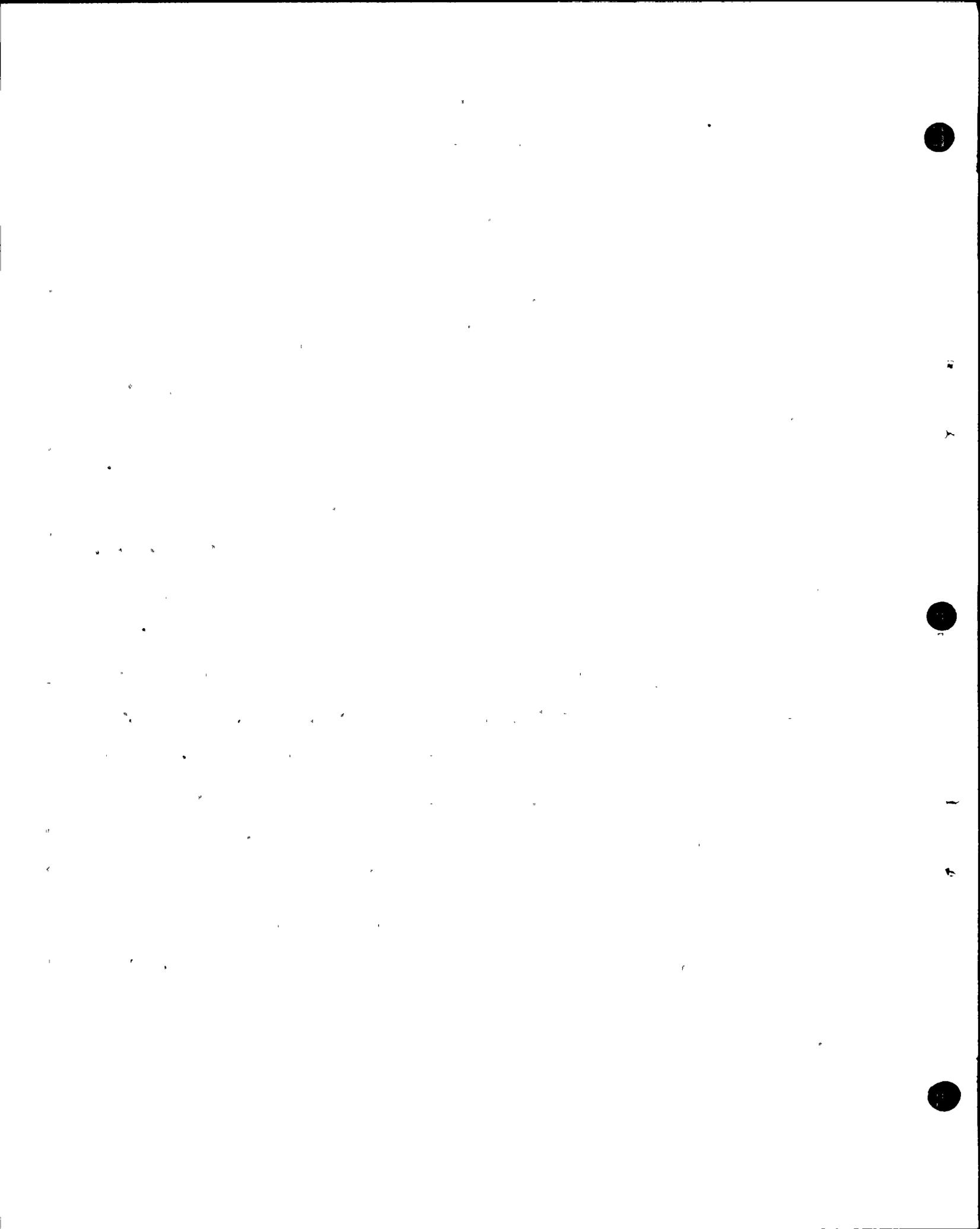
9 A In my opinion it satisfies the intent of that
10 Reg Guide.

11 It's difficult to say exactly whether it's in
12 100 percent compliance. I believe it's very much in compliance
13 with the letter of the Reg Guide, and totally in compliance
14 with the intent of the Reg Guide.

15 Q What might the possible exceptions be?

16 A Well, as I said, it's difficult to determine
17 whether it's completely in compliance because of the way the
18 Reg Guide is worded. It says that you should have this and
19 you must have this, but as a substitute for the one thing you
20 can have something else, and that there should be an instru-
21 ment directly above another instrument on the containment, and
22 things of that sort.

23 So question, for instance, is the center of the
24 dome directly above a point on the perimeter of the foundation
25 of the containment? Physically no, but I think the intent is



mpb2

1 met. And besides that, in the supplemental system, the
2 answer becomes yes.

3 So it's kind of difficult to give a complete
4 answer.

5 Q What equipment will be provided to inform the
6 control room operator of the value of the peak acceleration
7 level and the input response spectra values shortly after
8 occurrence of an earthquake?

9 A On the base of Unit 1 foundation is a response
10 spectra recorder, which is a vibrating rig type device that
11 enables one quickly to determine the response values repre-
12 sented by the earthquake. It's not instantaneous. But within
13 a matter of an hour or two the interpretation can be made.
14 There is an instantaneous readout available in the control
15 room from the triaxial accelerometer which is adjacent to
16 that response spectra recorder. It appears on the display
17 face of the earthquake force monitor which is mounted at the
18 top of the recording cabinets of the basic system in the
19 control room.

20 Q What was the basis for establishing values for
21 activating the readout of a seismic instrumentation to notify
22 the control room operators?

23 A I do not understand the question.

24 Q Do you want the question reread, or is there a
25 particular part you don't understand?



mpb3

1

MR. NORTON: Excuse me.

2

Mr. Steinhardt answered that he didn't understand the question.

3

4

MRS. BOWERS: Could you rephrase it, please?

5

BY MR. KRISTOVICH:

6

Q Okay.

7

I'm asking about notification of the control room operator, and I would like to know the basis for establishing values for activating the readout of the seismic instrumentation to notify the control room operator.

10

11

A I'm not sure that there is a value in the earth-

12

quake force monitor that is a triggering value. It may be

13

that there is one, but it's a low level. It would be compar-

14

able to the level which triggers the recording system. Any-

15

thing greater than approximately one percent g would immedi-

16

ately show up on the earthquake force monitor. It would not be

17

annunciated -- if the triggering level of the basic system

18

is exceeded, the recording process would start and the

19

annunciator lights would go on, and the operator would know

20

that all that needs to be done to find out what the peak

21

acceleration up to that moment was would be to take about 20

22

steps to get to the earthquake force monitor.

23

Q Okay.

24

To what extent will the seismic instrumentation

25

be employed to verify the seismic analysis following an



12

13



14

15



mpb4 1

earthquake?

2

A I'm not sure that that's within the scope of my knowledge. I can guess, but --

3

4

MR. NORTON: Well, excuse me, Mr. Steinhardt, we don't guess.

5

6

I'm not sure I understand the question.

7

8

I believe the witness testified that that was one of the reasons for this ACRS request, that that was one of the reasons for it. But it's not within this witness's purview to discuss that. It's more of Dr. Blume, Dr. Stuart Smith, Dr. Frazier questions than it is Mr. Steinhardt.

9

10

11

12

MRS. BOWERS: Mr. Kristovich, did you hear the comment by Mr. Norton that it's not within this witness's expertise?

13

14

15

Now we've heard, I think, that Dr. Frazier will be back.

16

17

18

MR. NORTON: Yes, but I hate to have him back to put him on the stand to answer that question. Obviously the data would be used -- you know, they'd look at the data and see what it says and review it.

19

20

21

22

23

24

I mean, I don't understand the purpose of the question. I mean when you say To what extent would it be used, which was what the question was, well, it's data. It's used. But, you know, what kind of an earthquake are you talking about? If it's a 3.2 earthquake on the San Andreas

25



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12



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14



mpb5

1 system eight miles away, I suspect the data wouldn't be used
2 at all. If it were a 6.2 earthquake on the Hosgri, I suspect
3 the data would be used a great deal.

4 I don't understand the question. I don't want
5 to call somebody back to answer that question if that's all
6 there is to it.

7 MRS. BOWERS: You can't listen to two people,
8 right?

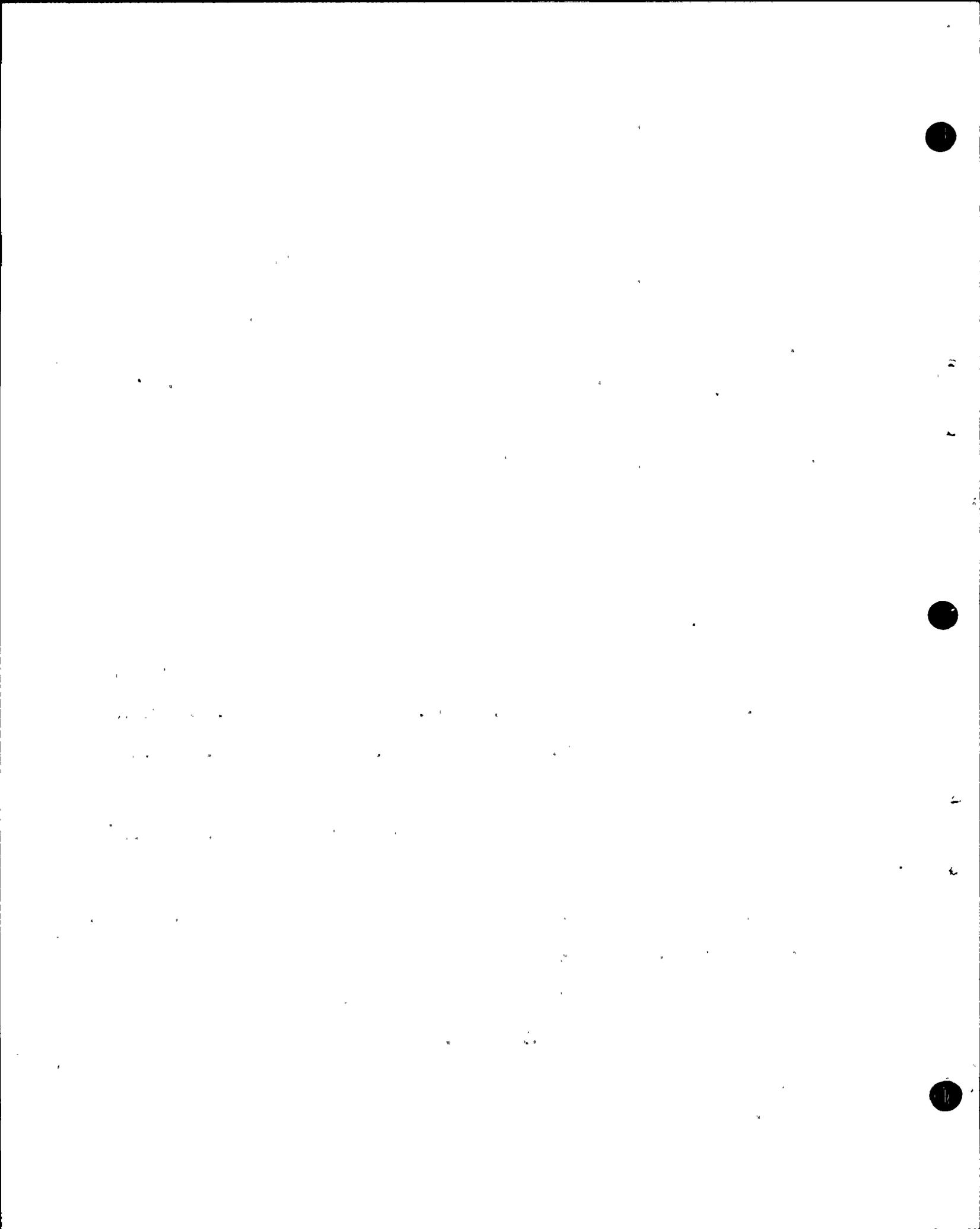
9 MR. KRISTOVICH: Right.

10 I'm sorry, were you just saying you didn't want
11 Dr. Frazier to come back?

12 MR. NORTON: Well, I'm not going to ask Dr.
13 Frazier back to put him on the stand to answer one question.
14 Dr. Frazier is going to be here to assist in the cross-
15 examination of Dr. Brung. But to answer that question it
16 seems to me that that is -- he's describing a system of
17 collecting data. He was asked, you know, to what extent was
18 the data to be used. And it depends on what the data is, I
19 guess.

20 I mean, I don't know why we would need to call
21 someone back to answer that question.

22 DR. MARTIN: I can't understand the problem. I
23 can find the answer in the written testimony under Purpose
24 of System. It was installed for a purpose. I assume the
25 data is going to be used to achieve that purpose, isn't it?



mpb6 1

THE WITNESS: That's correct.

2

MR. NORTON: Well, the question was to what extent would it be used to achieve that purpose.

3

4

DR. MARTIN: I would imagine to the fullest extent.

5

6

(Laughter.)

7

MR. KRISTOVICH: I didn't think it was that type of a question.

8

9

I'll move on.

10

(Laughter.)

11

BY MR. KRISTOVICH:

12

Q Okay.

13

Mr. Steinhardt, what criteria and procedures will be used to compare measured responses of category one structures and selected components in the event of an earthquake with the results as predicted by the seismic system and subsystem design analyses?

17

18

MR. NORTON: May we have the question reread? I believe you're reading it from a pad. Could you reread it instead of making her go back, and go a little bit slower. I didn't catch it all.

19

20

21

22

MR. KRISTOVICH: Sure.

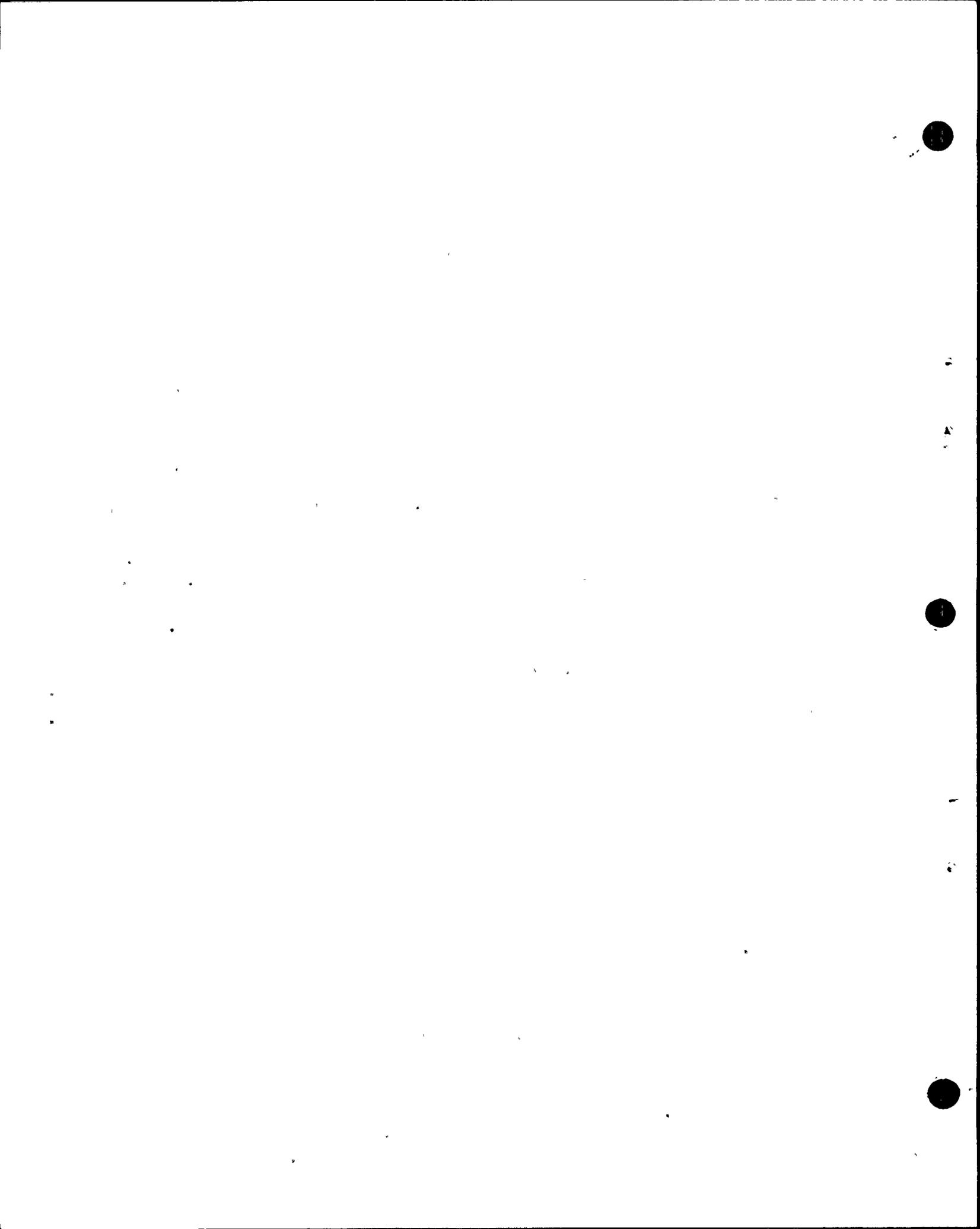
23

BY MR. KRISTOVICH:

24

Q What criteria and procedures will be used to compare measured responses of category one structures and

25



mpb7

1 selected components in the event of an earthquake with the
2 results as predicted by the seismic system and subsystem
3 design analyses?

4 MR. NORTON: Object.

5 That's outside Mr. Steinhardt's expertise.

6 BY MR. KRISTOVICH:

7 Q Is that outside your expertise?

8 A It's at least partially outside my expertise.

9 It's certainly outside the area of my direct knowledge.

10 MR. KRISTOVICH: Did you want to rule on that,

11 or....

12 MRS. BOWERS: Well, I think the objection is
13 sustained. I think the witness verified that.

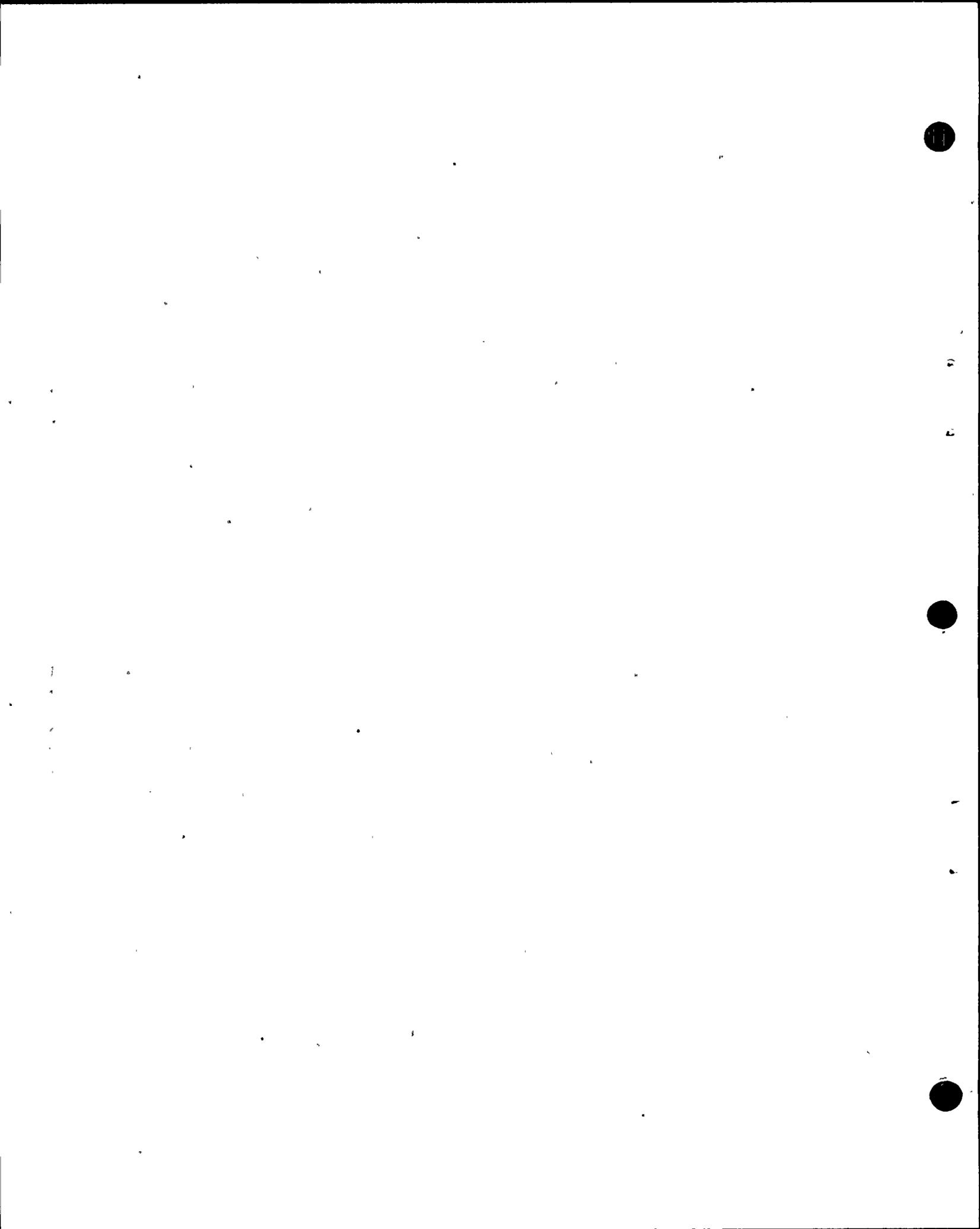
14 BY MR. KRISTOVICH:

15 Q Okay.

16 Mr. Steinhardt, how did the system function
17 during and following the August 1978 Santa Barbara earth-
18 quake?

19 A The supplementary system of course is not yet
20 functioning. The recording cabinet was received at the site
21 yesterday.

22 However, the basic system has been in apparently
23 good working condition for several years, but has never been
24 triggered by any seismic event, including the one you just
25 alluded to.



mpb8

1 Q Why was it not triggered by the Santa Barbara
2 earthquake?

3 A I can answer that question, I suppose. Because
4 the source of the earthquake was too far away for the -- the
5 earthquake was small enough so that the distance was too
6 great for it to be felt at the plant.

7 MR. KRISTOVICH: No further questions.

8 MRS. BOWERS: Mr. Ketchen?

9 MR. KETCHEN: No questions, Mrs. Bowers.

10 EXAMINATION BY THE BOARD

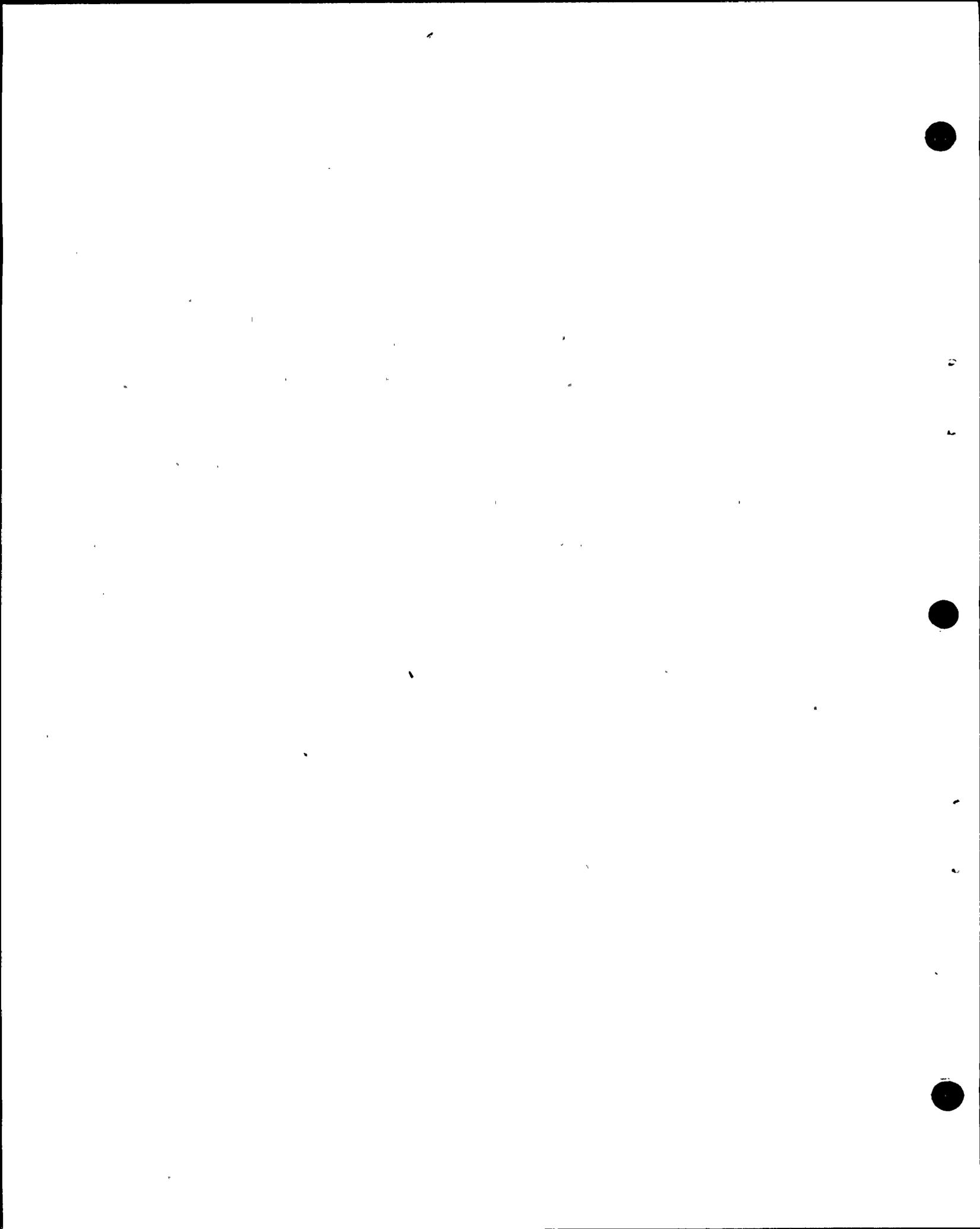
11 BY MR. BRIGHT:

12 Q Mr. Steinhardt, the first time we convened here
13 we heard a great deal about mounting instruments in strange
14 places, where they gave you bad results or something like
15 that.

16 Now it would appear that you have a great number
17 of data collection points and quite a bit of instrumentation.
18 And I guess the question that I think it within your purview
19 is:

20 Who made the decision as to how to scatter these
21 little rascals around? Were the kind of people that we've
22 been hearing talking about this subject, were they in on it, or
23 did you contract it out to some company, or what?

24 A The basic system was formulated before I became
25 somehow responsible for strong motion instruments at



mpb9

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Diablo Canyon.

But the choice of locations was somewhat comparable to what I'm about to describe.

When it was decided that the supplementary system should be installed URS Blume was asked to provide PG&E's civil engineering department with advice. Telephone calls were made to some of our other consultants, such as Dr. Stuart Smith, and a couple of others. The final decisions were made in conference with me and Dr. Jhaveri and Dr. Malik. That is, the semifinal decisions were made.

After that I made a few minor changes based on my own judgment. But the essentials of the system were decided in that way.

nd
MADELON
WRBLOOM
flws



B WRB/wbl 1
Els MADELON 2

3 Q So we can feel confident that the actual physical
4 location of the instruments will actually yield us -- and I
5 hate to call it "good data," but data that we would have
6 confidence that it would reflect the true state of affairs?

7 My problem is I keep going back to this accelerometer
8 meter that was located on this ridge or something, and there
9 seemed to be a great deal of talk about that.

10 A Yes.

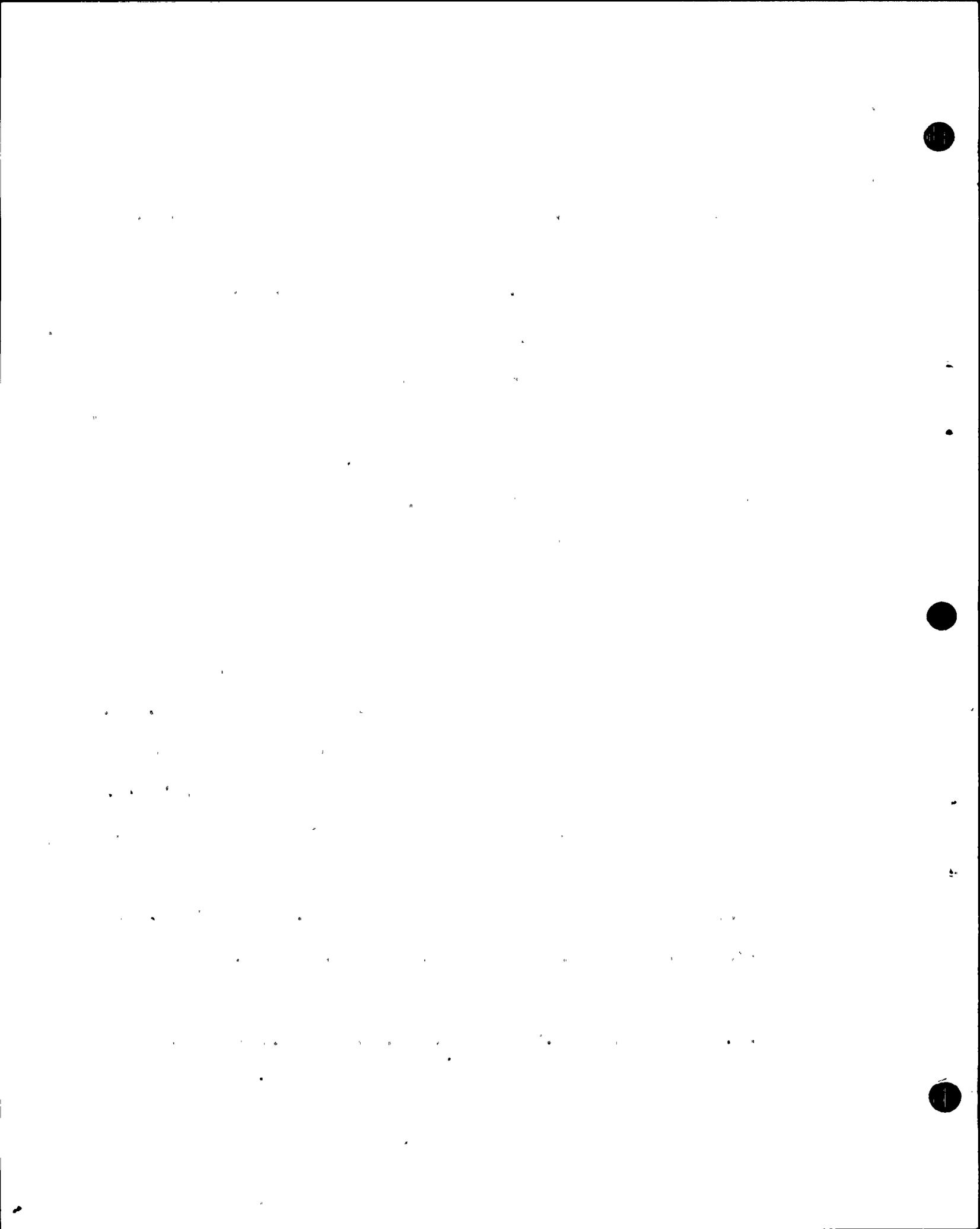
11 Q I noticed you have, I think it was a triaxial
12 mounted in the free field above, on a rocky ledge, the intake
13 structure. And then you have two little PRAs down at the
14 intake structure.

15 A Yes.

16 Q There may be no analogy, but this is what I am
17 trying to--

18 A Such considerations were entertained. That
19 particular location on that rocky cliff was given serious
20 thought. The desire was to get something out in that portion
21 of the plant area but far enough away from the buildings.
22 The particular location was selected to be back from the edge
23 of the cliff in a relatively broad part of the ridge, so as
24 not to be susceptible to these strange recordings which would
25 then be subject for arguments.

I feel that due consideration was given to
possibilities of having strange results. And I also feel that



1 the number of sensors will tend to average things out.

2 In other words, we're definitely not in the
3 situation of having all our eggs in one basket, just one
4 instrument to pick up a recording which may be a peak or may
5 be a valley and may be strange, and may not be.

6 Q Thank you.

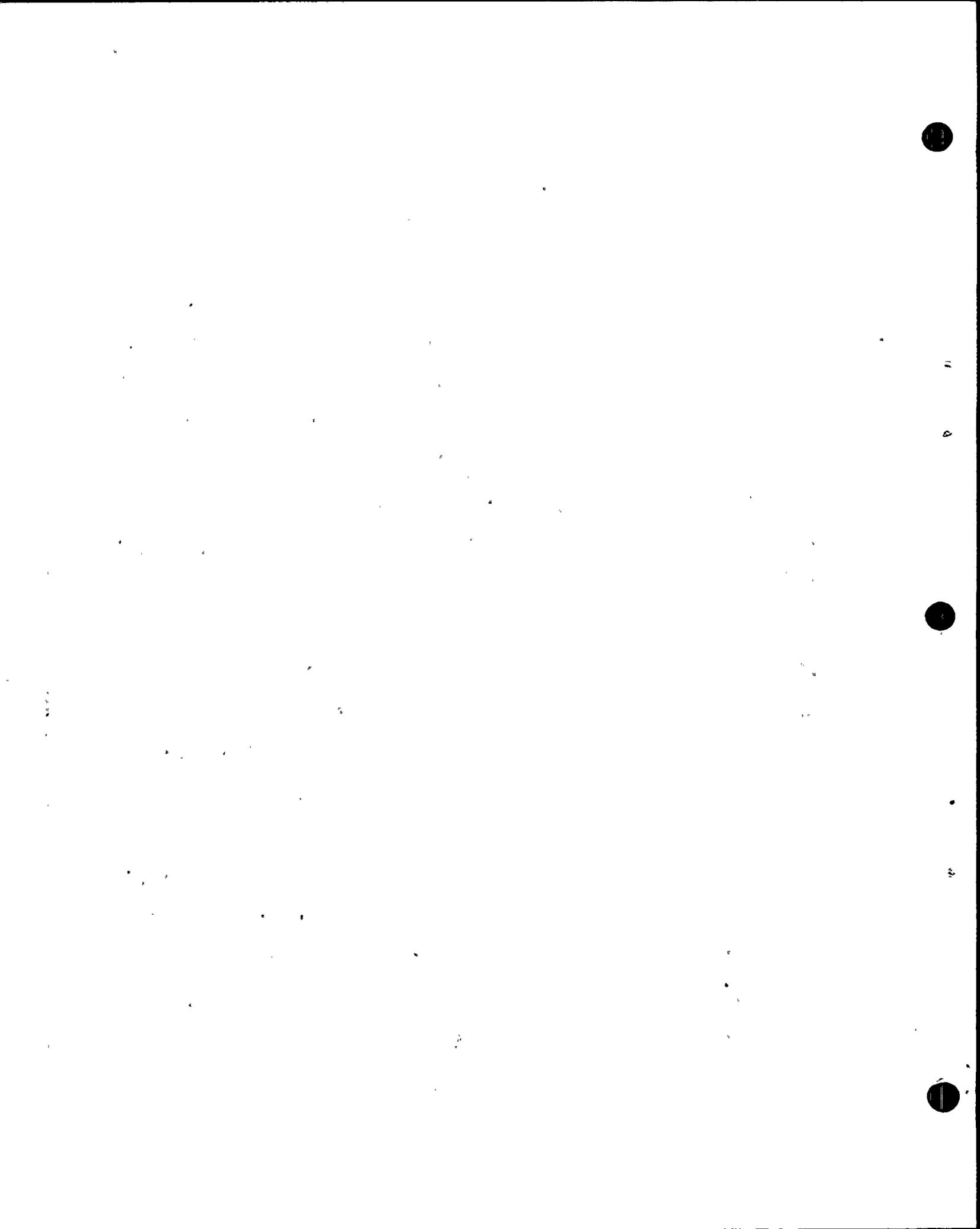
7 MR. NORTON: Excuse me, Mrs. Bowers.

8 I don't know quite how to do this, because I'm
9 going to be accused of testifying again. But I'm going to
10 object to Dr. Bright's question. And that's the way I'm going
11 to get to say what I want to say.

12 (Laughter)

13 I think that that question misconstrues the
14 previous testimony. And I think it is important-- it's
15 important for my understanding of this case, anyway, to have
16 that clarified. And I think for the Board's, too. And that
17 is that the testimony about the weird peak that was talked
18 about, and the motion -- that was the Pacoima Dam record,
19 located on top of this little pinnacle of rock. I don't
20 think the testimony was that that was not a true recording.
21 That instrument did in fact record that measure. but what
22 it was was a false impression that that's what the g was
23 from that earthquake all over. I think that's where the
24 testimony--

25 MR. KETCHEN: Mrs. Bowers,--



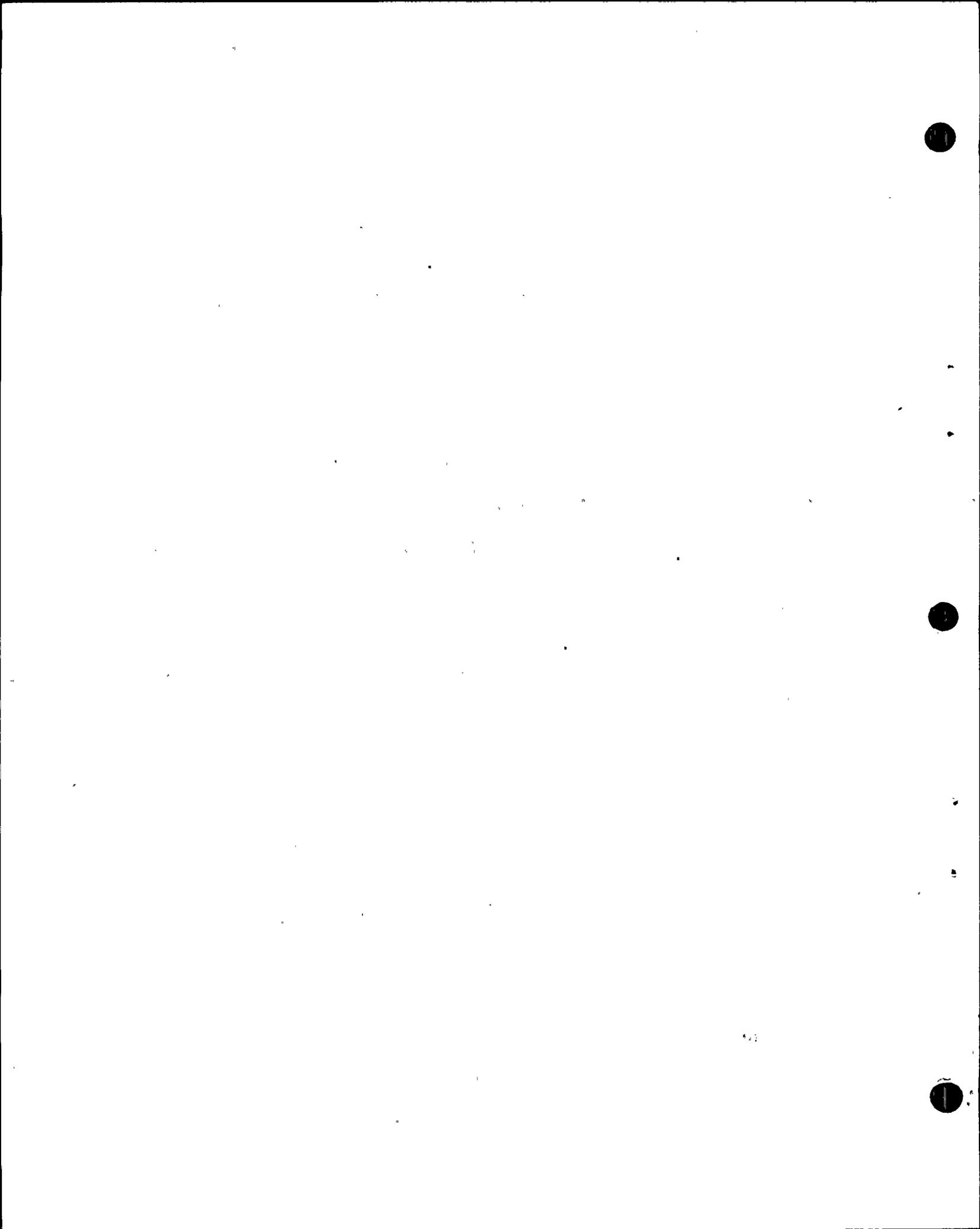
1 MR. NORTON: I'm objecting because I think the
2 question assumes a fact not in evidence, and I'm stating
3 what I construe the testimony to be. And I'm not testifying.
4 But I think the way the question was posed to this witness,
5 who wasn't here for that testimony and didn't hear that, it
6 could be misleading to the witness because he didn't hear
7 the testimony that you and I heard regarding that record.
8 And I think the distinction is that any instrument will
9 record what that instrument sees at that spot. That's not
10 to say that you'll get that acceleration ten feet away
11 or twenty feet away or a hundred yards away. And I think
12 that's what the witnesses were saying, that you can't take a
13 unique record like that and apply it universally; you have
14 to look at it and see why you got that peculiar spike.

15 So that's the basis of my objection.

16 MR. BRIGHT: Well, Mr. Norton, I was not trying
17 to say that that was a weird leftfield sort of recording.
18 I'm sure that it recorded what happened where the instrument
19 was. But I think what I heard -- and I'm sure it could be
20 dug out of the testimony, if necessary -- was that this was
21 not representative of what we were actually trying to look at.
22 And therefore I was merely asking Mr. Steinhardt if they had
23 considered this sort of thing.

24 MR. NORTON: Okay.

25 MR. BRIGHT: --when installing the instrumentation.



1 MR. NORTON: It was perhaps the wording of your
2 question. I wasn't sure that you and I were on the same
3 wavelength. We are now when I hear what you say, but I
4 wasn't when I first heard the question.

5 MR. BRIGHT: We non-legals have a problem in
6 framing questions.

7 MR. NORTON: So do we legals.

8 MRS. BOWERS: Does the objection stand?

9 MR. NORTON: I guess I'll withdraw it.

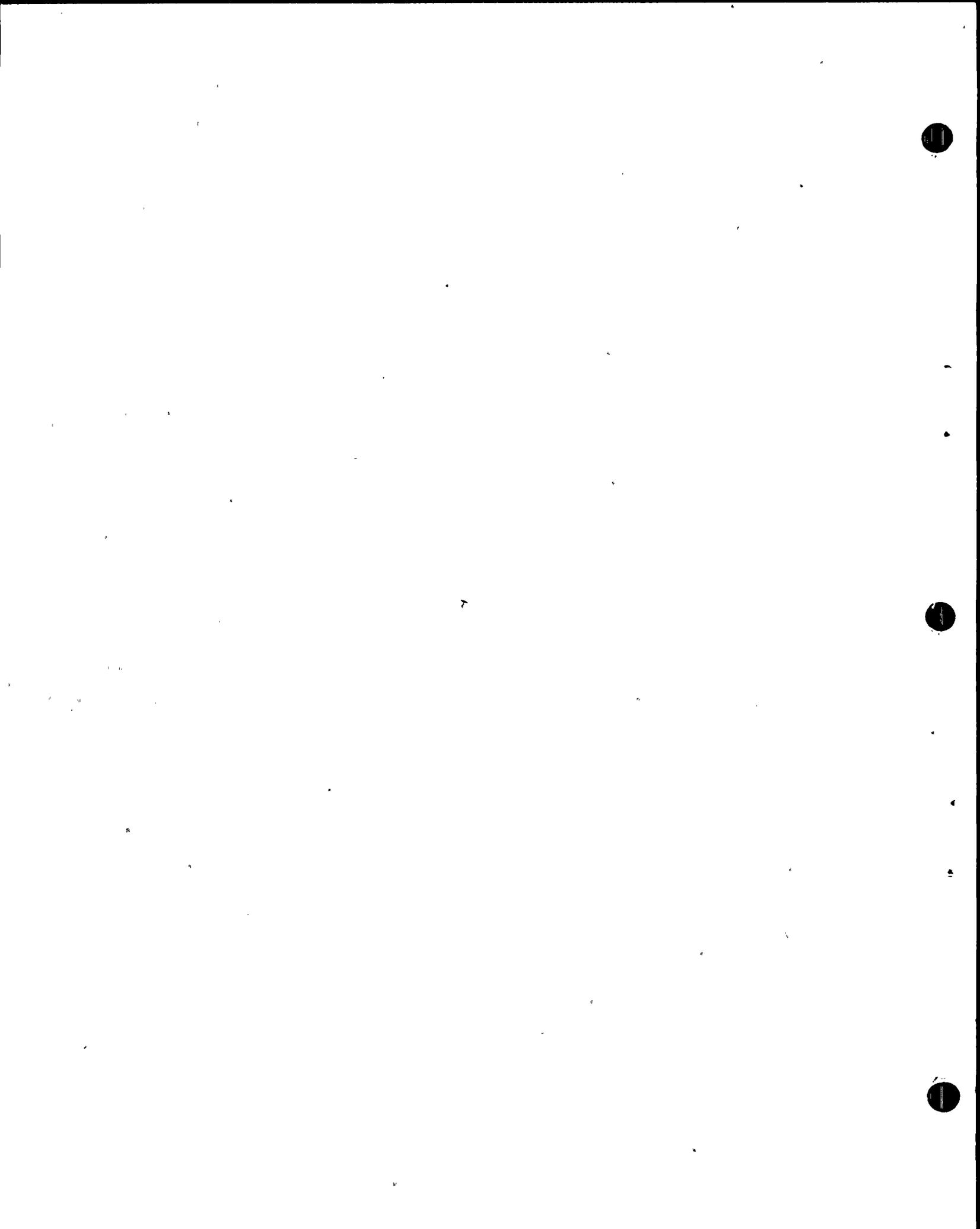
10 THE WITNESS: May I speak, Mr. Norton?

11 MR. NORTON: I don't think there's a question,
12 Mr. Steinhardt. No.

13 MR. KETCHEN: Mrs. Bowers, may we then understand
14 that Mr. Norton's comments, or his argument as to how he
15 individually, as representative of PG&E, views what the
16 record itself says-- I don't know how to object to it, or
17 to what Mr. Norton said, or to cross-examine Mr. Norton or
18 anything of that sort. But I think I'd like to see the
19 record say that there is an objection to this type of procedure.
20 I think there is an appropriate method of clarifying this
21 and that's on redirect examination.

22 I hate to see the record messed up. But I'm not
23 sure that the approach taken is the proper way to clarify it.

24 MR. NORTON: I think, Mr. Ketchen, you're messing
25 up the record. Because I have the right to object to any



1 question whether it's by a Board member or other counsel.

2 Now if there had been another counsel I would
3 have objected immediately, and I would have said the same
4 thing .

5 MR. KETCHEN: There's no question about your
6 right to object. But there are bases for objection, and
7 characterization of the record may not be one of those.

8 MR. NORTON: Well I suggest you check your rules
9 of evidence. Because the-- And I will address the Chairman:

10 I suggest Mr. Ketchen check his rules of evidence
11 and he'll find that an objection for misstatement of prior
12 testimony is certainly a basis for an objection.

13 MRS. BOWERS: Well the record, of course, will
14 speak for itself. And in these hearings there's a peculiar
15 problem in the fact that all witnesses are not present at all
16 times. And I think Mr. Bright didn't fully explain his
17 recall of the testimony, sort of assuming this witness was
18 familiar with it.

19 We agree that you certainly have a right to
20 object to Board questions. You might give the Board a chance
21 to explain, however.

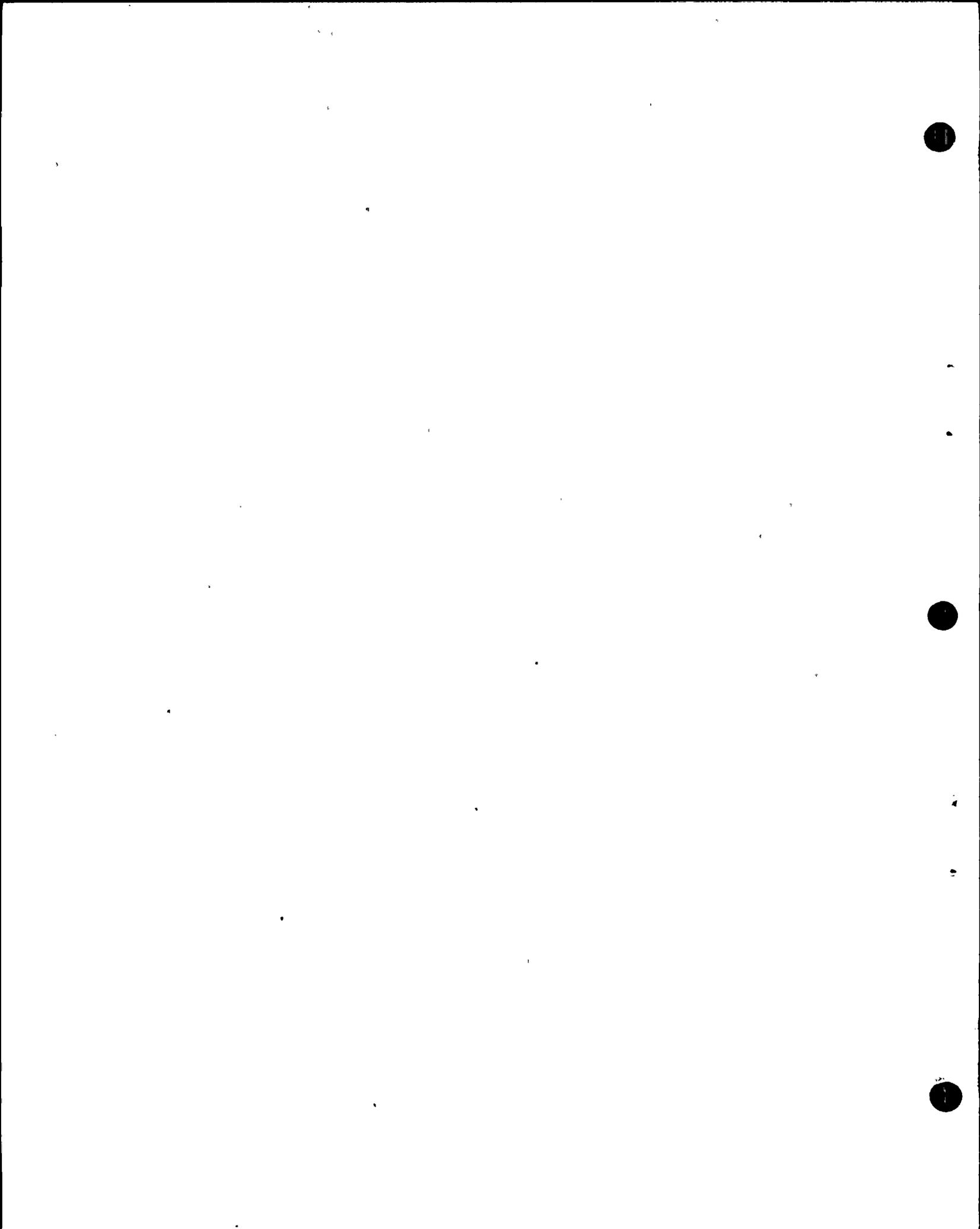
22 (Laughter)

23 MR. NORTON: I did.

24 THE WITNESS: I think it might be helpful--

25 MR. NORTON: No, Mr. Steinhardt.

WRB/wb5



1 (Laughter)

2 MRS. BOWERS: Mr. Bright would like to withdraw
3 the question.

4 MR. KRISTOVICH: I'll ask it.

5 BY DR. MARTIN:

6 Q How does this system of instrumentation differ
7 from instruments, or use of instruments that would be
8 installed at a seismological observatory?

9 A The typical instrument at a seismological
10 observatory is not a strong motion accelerometer sort of
11 defice. It's typically a highly sensitive instrument intended
12 primary to pick up weak incoming signals, weak either because
13 the event is small or because it's distant. And such
14 seismographs typically go off scale if a seismic event of
15 any considerable magnitude occurs fairly near the observatory.

16 These instruments are at the other end of the
17 spectrum of sensitivity. They are deliberately made much
18 less sensitive so that they will not go off scale. But,
19 of course, they are just sensitive enough so that a good
20 and useful record for engineering purposes, rather than for
21 scientific purposes, will be acquired.

22 Q Do you have any instruments installed at Diablo
23 that are of equivalent sensitivity?

24 A Equivalent to what?

25 Q Equivalent to what you would put at an observatory?



1 A No. We rely-- We, the engineering profession,
2 rely on observatories at Berkeley, at Pasadena -- Cal Tech
3 at Pasadena, at the stations put up by the U.S. Geological
4 Survey. It's not necessary to have a highly sensitive
5 instrument in the vicinity of the Hosgri Fault, for instance.

6 It is desirable to have several that are close enough to
7 pick up a record. But it doesn't have to be just three
8 miles away.

9 Q I'll keep at it for a while.

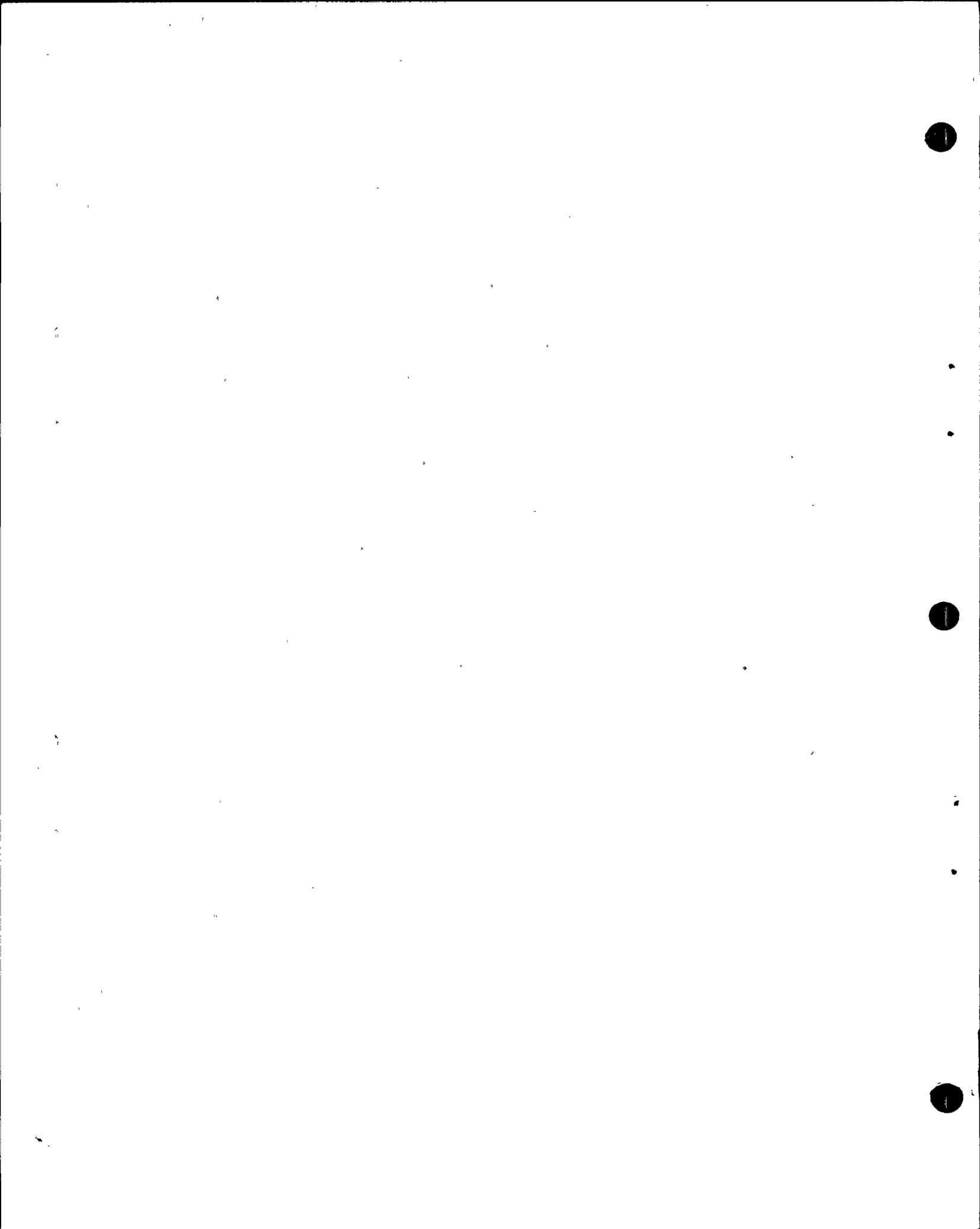
10 Is there any instrument at Diablo Canyon which
11 would have detected the recent earthquake in southern
12 California, if it had been turned on?

13 A No. The triggering level of the basic system is
14 at approximately 1 percent g. I don't know exactly the
15 triggering -- the lower limit of sensitivity at seismological
16 observatories, but it is much lower than 1 percent g. But
17 1 percent g is much below what most human beings would feel
18 if they were subjected to that acceleration.

19 So the instruments are sensitive enough for
20 engineering purposes but not for seismological studies.

21 Q All right.

22 So then your instruments aren't placed, or designed,
23 to determine such things as the epicenter of an earthquake or
24 its magnitude at some distance; is that a correct statement;
25 that you are more interested in knowing what kind of motion



1 occurs on the structure?

2 A A reason for purchasing the more expensive and
3 more sophisticated gain ranging system was to enable this
4 installation to do what most comparable installations do not
5 do, and that is record earthquakes which are virtually in-
6 significant except for scientific purposes. And so it's
7 quite possible that such earthquakes would be captured on
8 tape by this system. The triggering level can be set low
9 enough for the supplementary system so that an earthquake
10 which is almost not felt could nevertheless be recorded.

11 MR. NORTON: I don't believe Mr. Steinhardt
12 answered Dr. Martin's question, though. And that was: the
13 purpose of the instruments was to measure acceleration
14 or to measure magnitudes of earthquakes, or epicenters?

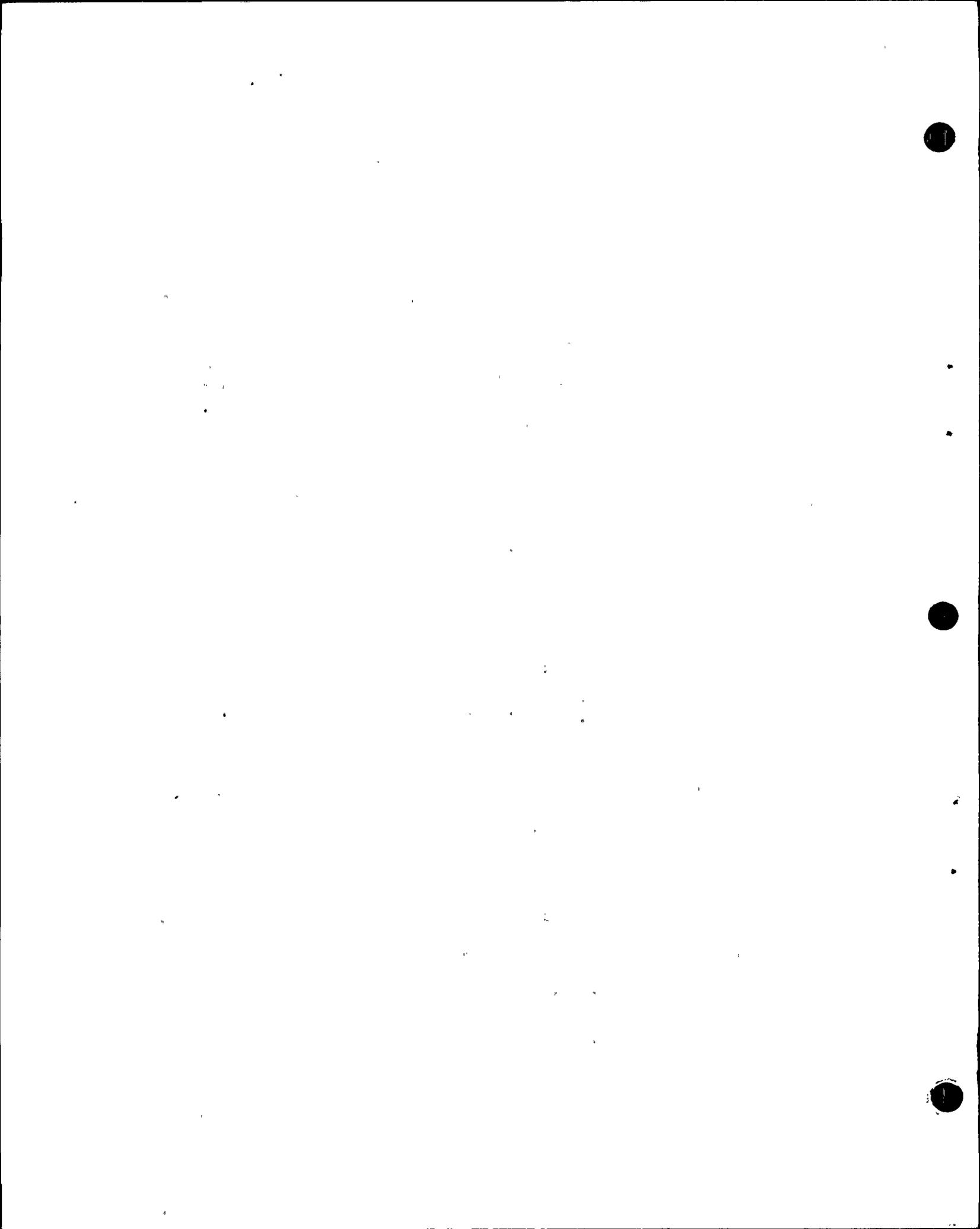
15 THE WITNESS: I believe there are methods for
16 inferring the magnitude of an earthquake from the type of
17 record that could be picked up by the system at Diablo Canyon.

18 BY DR. MARTIN:

19 Q All right. I'll try another tack.

20 You list in your written testimony the purpose of
21 installing the supplemental system, you give a purpose for
22 installing the basic system. I assume the system was designed
23 to achieve those purposes.

24 Now Dr. Bright's question went to an instrument
25 that was installed for a different purpose.



1 A I don't believe that's true.

WRB/wb9
2 The answer to your first question is Yes. The
3 answer to your second implied question is, I believe that's
4 not true. I believe I understood Dr. Bright's question. I
5 believe I was responsive to it.

6 Q Okay.

7 A I believe I understood the background of the
8 question, even though I didn't hear the testimony that it
9 referred to.

10 Q All right. Instead of muddying the water any more
11 I'm going to stop asking questions.

12 (Laughter)

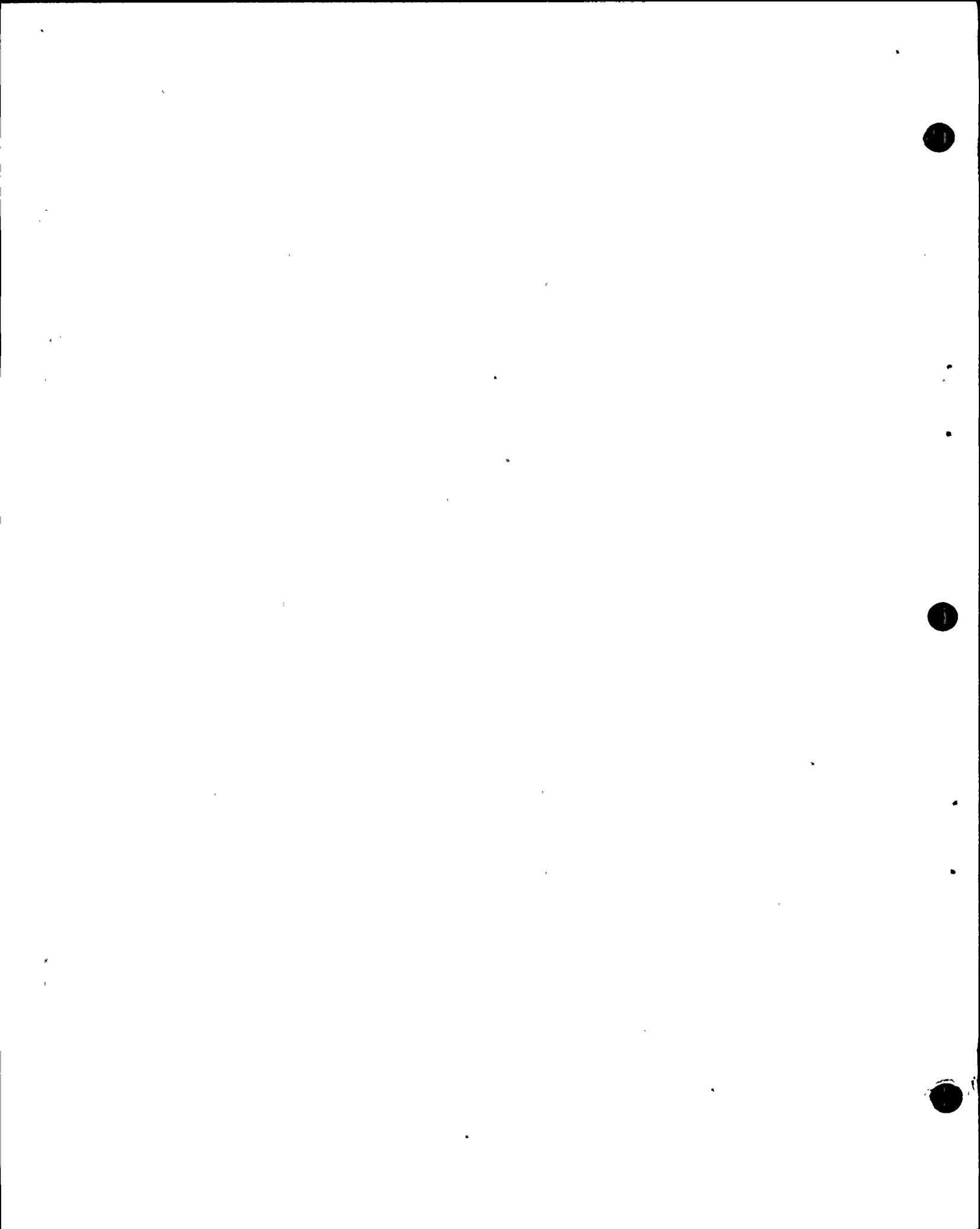
13 BY MRS. BOWERS:

14 Q I don't believe you were here, Mr. Steinhardt,
15 when we had a discussion at the beginning of this segment
16 of the hearing and I put the parties on notice that I had
17 been reading Dr. Bruce Bolt's new little paperback on
18 earthquakes over the Christmas holidays. And, because there
19 were prior references to it, it was decided that it should
20 be marked for identification. And PG&E volunteered to donate
21 three copies for the record.

22 MRS. BOWERS: Has that been done?

23 MR. NORTON: They'll be here tomorrow morning.
24 We had to go out and buy them.

25 MRS. BOWERS: Fine.



1 THE WITNESS: And I was present.

WRB/wb10

2 MRS. BOWERS: Oh, were you?

3 BY MRS. BOWERS:

4 Q Anyway, in this little book -- I don't know
5 whether I can find it right now. But in Japan they've been
6 experimenting with the idea of putting sensors -- well, I think
7 they used the figure of 200 kilometers -- out on the ocean
8 floor. And then there are sensors that take it up to the
9 land where they can be recorded.

10 Did PG&E consider putting any kind of a sensor
11 on top of the Hosgri Fault?

12 A Yes, we did consider it. We considered many
13 things as a result of the interest expressed by the Advisory
14 Committee.

15 The system that we decided to purchase has the
16 initial cost of \$120,000 approximately. By the time it's
17 installed and operating the total cost will come to about
18 \$200,000. The annual maintenance cost is undetermined, but
19 will be a fair number of thousands of dollars.

20 There had to be a limit. An underwater sensor
21 properly installed and maintained is extremely expensive.
22 Even land-based stations. And this was one of the things
23 that was considered. Land-based stations of the type that
24 Dr. Martin referred to, or was implying at least, that would
25 be expensive. So just because there had to be a limit we did
not go quite that far.



2C wrb/agbl

1 Q Well I know the diagram shows a boat directly
2 above it, so I would assume there would have to be a boat.

3 A A tethered buoy, perhaps. There are other ways.

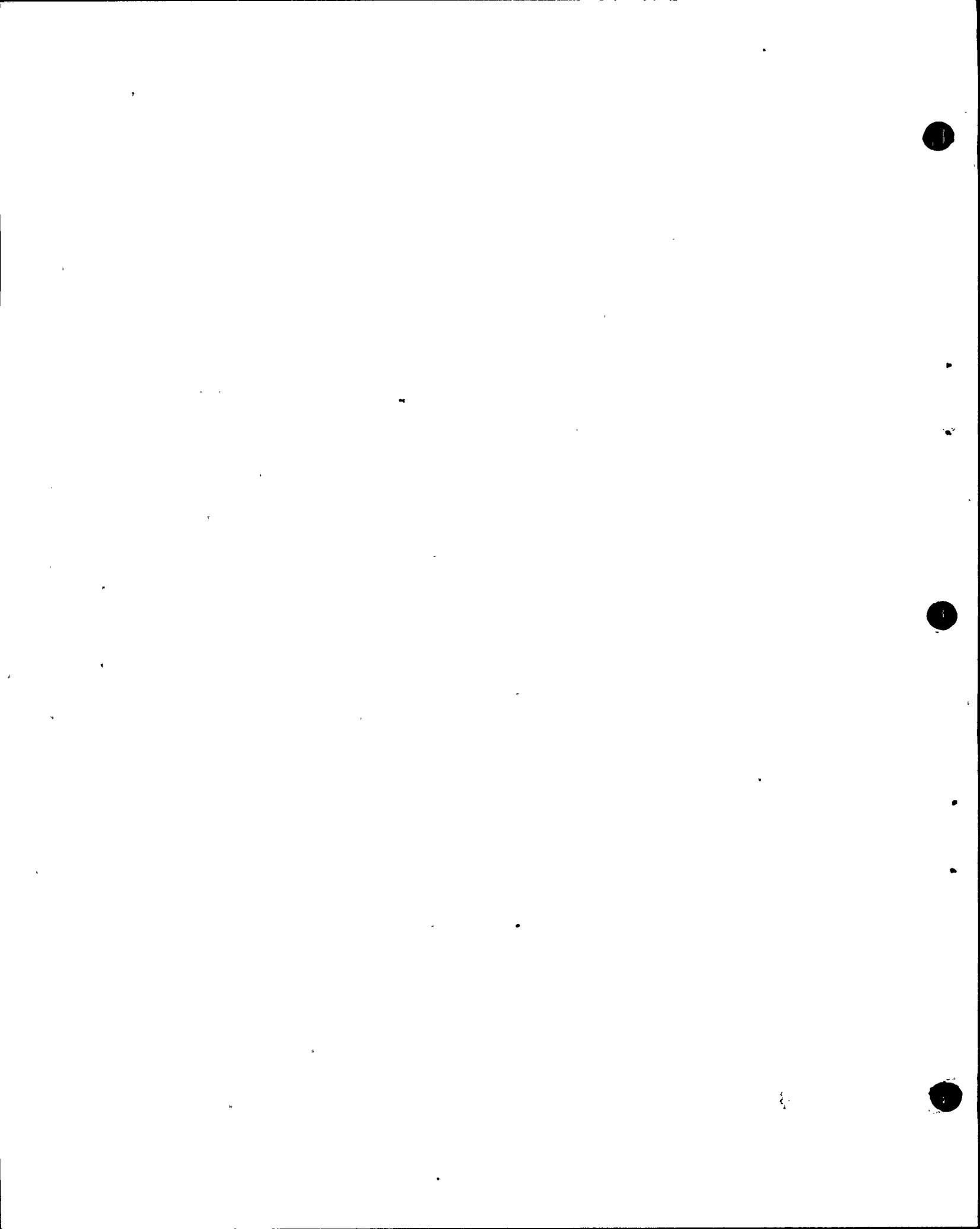
4 Q Well I'm not sure whether this is within your
5 area or not, but if it was determined that that should be done,
6 what kind -- I mean, it's so close compared to the 200 kilo-
7 meters that was considered in the Japanese theory. Would
8 there be a value of having something directly on the fault
9 would you get information -- more information, or information
10 more quickly than the various sensors in and around the
11 facility?

12 A I can give opinions. For the scientific world,
13 the answer is clearly yes, it would be extremely valuable
14 if the Hosgri Fault ever moves.

15 In the opinion of PG&E, corporately and myself
16 personally, we may never get any signal of any sort from the
17 Hosgri Fault, any signal of significance.

18 But if it did, yes, for scientific purposes it
19 would be extremely useful. Whether it would be necessary to
20 have such data in order to determine the effect of such an
21 event on the plant or not is not so clear. I would guess that
22 it would not be necessary.

23 Q Well does the close proximity have significance
24 here, because we're talking about .25 miles, 3 miles,
25 something like that for the Hosgri Fault.



wrb/agb2

1 A Dr. Blume could answer this better. I think I
2 can make a decent answer.

3 The engineering fraternity very much wants to have
4 good records of strong and fairly strong earthquakes close
5 to the source. I don't believe it is necessary or particularly
6 valuable to be right on top of the source. Two or three
7 kilometers, even three miles is better than most of the close
8 in strong data that we have.

9 There's a widespread opinion that the variations
10 of response at ground surface near the fault do not vary
11 directly so that right over the fault you get a strong peak.
12 And so it seem that anywhere near the fault, as long as it is
13 near the fault, is good enough to give useful engineering
14 information.

15 MRS. BOWERS: Well the Board has no further
16 questions.

17 Mr. Norton?

18 MR. NORTON: We have no further questions.

19 MRS. BOWERS: Mr. Kristovich?

20 MR. KRISTOVICH: No further questions.

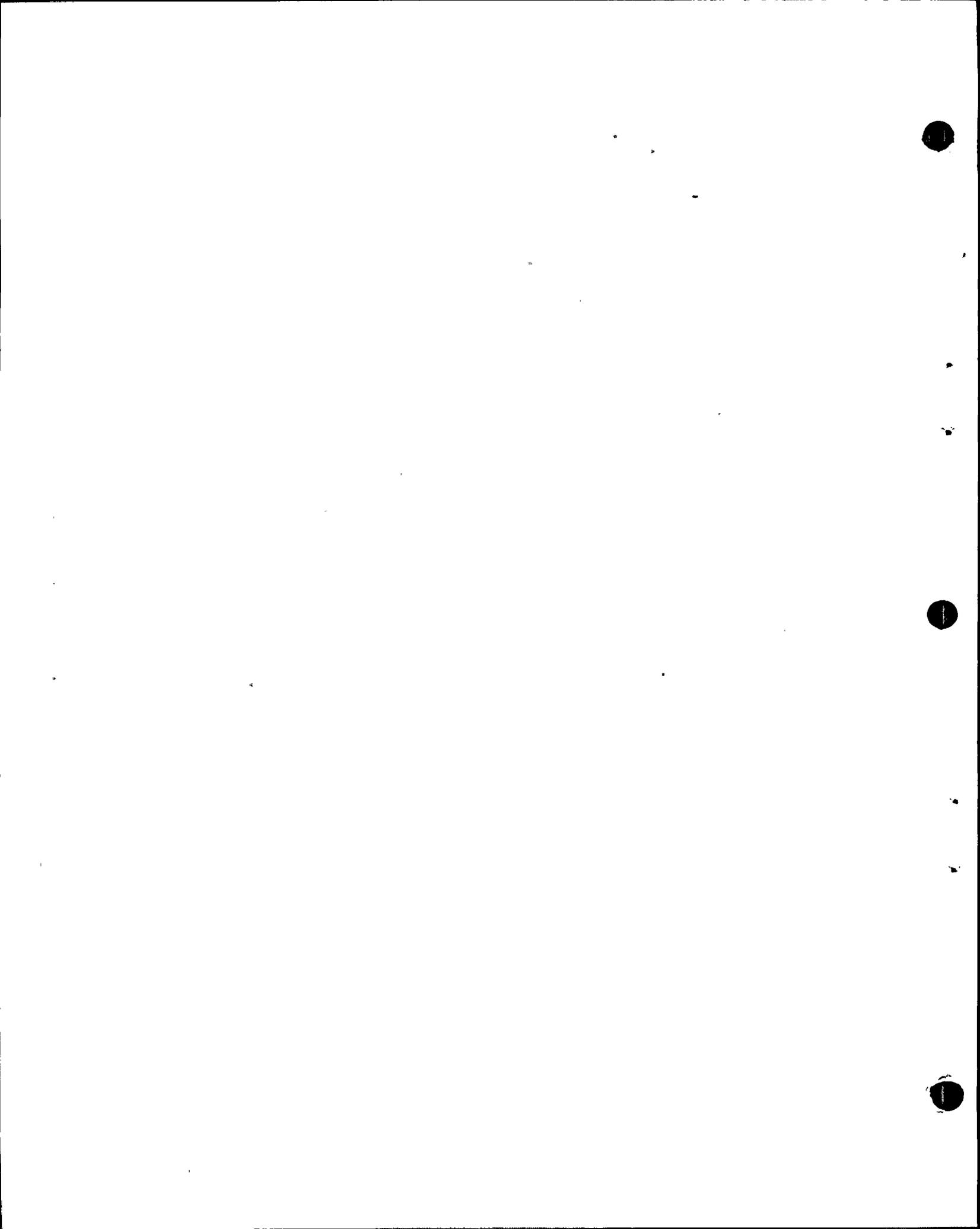
21 MRS. BOWERS: Mr. Ketchen?

22 MR. KETCHEN: No further questions.

23 MRS. BOWERS: Well may the witness be excused?

24 MR. NORTON: Yes.

25 MRS. BOWERS: Thank you very much. I would like



wrb/agb3

1 to have comment from the other parties, if you don't mind,
2 this is a democracy.

3 Mr. Kristovich, any objection to this witness
4 being excused?

5 MR. KRISTOVICH: No objection.

6 MRS. BOWERS: Mr. Ketchen?

7 MR. KETCHEN: No objection.

8 MRS. BOWERS: Well the witness will be excused.

9 (The witness excused.)

10 Well it's almost time for Dr. Martin's ding-dong
11 to ding-dong, so I suggest we recess and begin at 8:30 in
12 the morning.

13 (Whereupon, at 4:55 p.m., the hearing in the
14 above-entitled matter was recessed, to reconvene at 8:30 a.m.,
15 the following day.)
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