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June 10, 1980



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Appeal Panel
U.S. Nuclear Regulatory
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Bethesda, Maryland 20014

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Atomic Safety and Licensing
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Re: Pacific Gas & Electric Co.
(Diablo Canyon Nuclear
Power Plant, Units 1 & 2
50-323 O.L. - Board Notifi-
cation)

Gentlemen:

Consistent with the Atomic Safety and Licensing Appeal Board's directive that all parties should bring to its attention new information which is relevant and material to the matters being adjudicated, 1/ counsel provides the following information. The seismic re-analysis of the Diablo Canyon piping and related supports has been reviewed by both the Advisory Committee on Reactor Safeguards ("ASLB"). In early May the Joint Intervenors received a letter from Pacific Gas and Electric Company. ("PG&E") (see attached) summarizing the utility's

1/ Duke Power Co. (William B. McGuire Nuclear Station, units 1 and 2) ALAB-143, 6 AEC 623 (1973).

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recent inspection at Diablo Canyon "to verify that actual configurations of safety-related piping agree with the models used to seismically analyze them." The results of that review raise serious questions about the conclusions of the ACRS and the ASLB. PG&E concluded in part that:

The following types of discrepancies are typical of those found, in order to frequency of occurrence: valve weights not correct; weights of valve flanges not modelled; center of gravity of valve operator not adequately considered; support location differences of greater than one pipe diameter; supports or grout in penetrations; differences in pipe geometry; invalid assumptions in modeling of analysis endpoints; differences in insulation thickness and pipe diameter.

It was decided that 49 of the 192 large diameter analyses and 8 of the 30 small diameter analyses had differences significant enough that the results were not obviously conservative and that they should be reanalyses. This amounted to approximately a 26 percent reanalysis rate. In addition, there were 10 large diameter and 4 small diameter analyses for which differences were resolved by a field hardware change.

These conclusions undermine the ACRS conclusion that: Staff's review of the Applicant's seismic reevaluation, the likelihood of an undetected error in the seismic analysis or design is greatly reduced. (ACRS letter of 7/14/78) as well as the ASLB finding that:

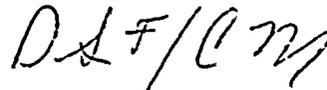
The staff review of the seismic design of the Diablo Canyon plant was the most extensive ever undertaken by the Staff of the NRC (Knight testimony at 54). The Applicant's review was also extraordinarily thorough. (PID at page 92)



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The recent "as-built" audit clearly demonstrates a significant breakdown in the PG&E quality assurance program. The QA breakdown is magnified since the pipe supports and anchors were supposedly nearly 100% reinspected in response to the deficiencies discovered by the NRC I&E during their audits at Diablo Canyon in 1976 to 1978.

Very truly yours,



David S. Fleischaker, Esq.

DSF:cm
Enclosure
cc: All members of the
Certificate of Service
Ray Fraley (ACRS)

