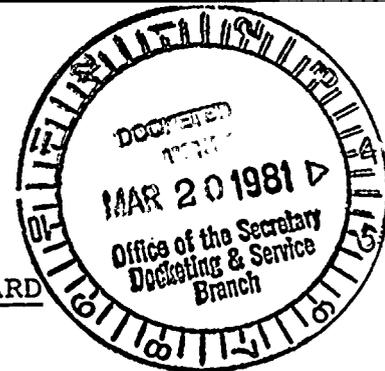


3/16/81

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



3/16/81

In the Matter of  
PACIFIC GAS AND ELECTRIC COMPANY  
(Diablo Canyon Nuclear Power  
Plant, Units 1 and 2)

Docket Nos. 50-275 O.L.  
50-323 O.L.

(Low Power Test Proceeding)

JOINT INTERVENORS' RESPONSE  
TO NRC STAFF INTERROGATORIES



Joint Intervenors hereby respond to the NRC Staff's  
February 24, 1981 Interrogatories to Joint Intervenors,  
as follows:

RESPONSE TO INTERROGATORY 1:

- a. Joint Intervenors have not admitted each statement in the Request for Admissions.
- b. For the statements which Joint Intervenors do not admit, refer to Joint Intervenors' Response to NRC Staff's Request for Admissions.

RESPONSE TO INTERROGATORY 2:

- a. The portions of the admission statement which Joint Intervenors did not admit are identified in the following sections. The numbering accords with that utilized by the Staff in its Request for Admissions.
- b. The basis for Joint Intervenors' disagreement with each specific statement is provided in the following section.

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Admission A-1:

The core exit thermocouples do not indicate water level and have been shown at TMI to be an unreliable indicator of inadequate core cooling.

Admission A-2:

The saturation meters do not indicate water level.

Admission A-3:

Whether the massaged data from core exit thermocouples and saturation meters provides an "equivalent information to that....from direct water level indicators," is a matter of judgment and has not been proven for all accident and off-normal conditions.

Admission A-4 and A-5:

Core exit thermocouples provide an indication of the fluid temperature at a few positions above the core but do not provide a direct indication that the core is "covered" or "uncovered."

Admission A-6 and A-7:

The normal water level in the reactor coolant system is a full system. The void maintained in the pressurizer is for the purpose of maintaining pressure control by reducing (by condensing) or expanding (by heating) the steam void to change the pressure in the primary coolant. The inadequacy of the pressurizer level as an indicator of vessel water level was vividly demonstrated in the TMI accident.

Admission A-10:

There are conditions where absence of accurate reactor vessel water level data may allow incorrect operator action such as operator override of safety injection. These conditions would include one where the indications of a voided core were masked from the operator by equipment failure or unanticipated off-normal conditions.



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Admission A-11:

The eventual use of the water level instrumentation may extend beyond monitoring and operator action. If the system proves to be effective and useful, it may become an input signal for makeup and/or safety systems.

Admission A-12:

None of the items A-12, a through c, indicate inadequate core cooling. Instead, each is an isolated symptom which may or may not be indicating correctly, but which must be used by an operator, together with interpretation, judgment and discretion to decide on an operator action. Such actions are clearly subject to error.

Admission A-13 and A-14

Although Joint Intervenors agree in general that procedures have been proposed, we cannot admit to the efficacy of those procedures in the event of inadequate core cooling.

Admission A-15:

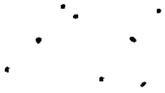
The ability of "procedures to detect inadequate core cooling" is the focus of the contention. The contention is based on the need for more direct indication. There is no assurance that procedures will be reliable under all conditions of equipment failure, off-normal plant conditions, and operator experience.

Admission A-16:

Joint Intervenors have insufficient data available to conclude (1) if other plants' procedures have been found acceptable, (2) the applicability to DCNPP, and (3) the adequacy of other procedures to enhance operational safety.

Admission A-17:

Due to the fact that the Applicant's submittal on Westinghouse's proposed reactor vessel water level measurement technique was rendered incomplete by PGandE's assertion that it contained proprietary information, Joint Intervenors have insufficient data to admit to this statement.



Admission A-18, A-19 and A-20:

Joint Intervenors have insufficient data to conclude that these methods will meet all current applicable NRC regulations.

Admission A-21 to A-25 and A-27 to A-29:

There is inadequate Diablo-specific evidence in the record to enable detailed quantification of the public risk (accident release probability times consequence probability) for the accidental radioactive releases which might occur during the proposed Diablo Canyon Low Power Testing Program (LPTP). Further, no effort has been made to quantify the uncertainties in the qualitative risk projections which have been proposed. We believe that the Applicant has presented no plant-specific or site-specific risk assessment for the LPTP in either the Diablo Canyon FSAR or in response to NRC questions. Therefore, we assume that the proposed admissions are apparently based on the NRC's "introductory remarks" in Supplement 10 of the Diablo Canyon SER. However, the NRC statements in the SER appear to be based on extrapolation of the WASH-1400 conclusions for a generic PWR at a generic site rather than on a detailed assessment of the specific Diablo Canyon conditions. Such a detailed plant-specific fault tree and event tree assessment has repeatedly been suggested by the ACRS and is recognized as potentially useful in plant licensing in the Task II.C programs in the TMI Action Plan (NUREG-0660). Unfortunately, the Diablo Canyon specific quantitative assessments described in TMI Task II.C have not yet been prepared by the Applicant or reviewed by the NRC (an exception is the partial systems interaction study conducted by the Applicant and reviewed by the NRC in Supplement 11 of the SER). Finally, the NRC's Diablo Canyon risk remarks address only releases through the air pathway and thus fail to adequately address liquid pathway releases as documented for the NRC by Sandia Laboratories in NUREG/CR-1596.

In January 1979, even before the TMI-2 accident, the NRC Commissioners, in a Policy Statement, concluded that accident probabilities estimated in WASH-1400 were not reliable and acknowledged shortcomings in the methods by which WASH-1400 was prepared and issued. One key shortcoming was in the quantification of uncertainties. The WASH-1400 authors identified the uncertainty in their results as a factor of  $\pm 5$  ( $\times 5$  or  $\times 1/5$ ) in probability and a factor of  $\pm 4$  ( $\times 4$  or  $\times 1/4$ ) in prompt consequences. They also limited



the applicability of the results to the first one hundred U.S. plants and a five-year period. Subsequent to publication of WASH-1400, the Study Director, Dr. Norman Rasmussen, acknowledged that the uncertainties may be much larger. Rasmussen made the following estimate of uncertainties during testimony on July 3, 1978 before the Oregon Energy Facility Siting Council:

"In the last three years, as we have come to understand the calculational model better and the sensitivity to the input values, I believe the uncertainty may be somewhat larger than stated in the report, perhaps by a factor of two. In addition, I would point out that the uncertainty is not the same on all parts of the curve. For example, if we look at..... the probability distribution for early fatalities .....we notice that at the low consequence end an uncertainty of substantially more than  $\pm 4$  in consequence, while at the high end an uncertainty of  $\pm 4$  in consequence implies an uncertainty of considerably more than  $\pm 5$  in probability."

Within the last few years, studies of uncertainty in the absolute values in nuclear risk assessment have been conducted. For example, a recent and very thorough review of WASH-1400 was conducted by the Risk Assessment Review Group (RARG), set up by the NRC and chaired by Dr. Harold Lewis. Their report, entitled, Risk Assessment Review Group Report to the U.S. Nuclear Regulatory Commission, NUREG/CR-0400, was published in September of 1978. The RARG held a dozen public meetings in 1977 and 1978 and received numerous presentations of data and viewpoints, both supportive and critical of the WASH-1400 methodology and results. The data presented at these meetings (several thousand pages) represents one of the largest and most recent sources of information on reactor accident probability and consequences covering a wide range of viewpoints and opinions. For example, the RARG concluded in Disjoint Item 6 that the subject of earthquake-initiated accidents deserves more attention than it received in WASH-1400. The RARG report does not quantify accident probability uncertainty, but does include the following observation:

"We are unable to determine whether the absolute probabilities of accident sequences in WASH-1400 are high or low, but we believe that the error bounds on those estimates are, in general, greatly understated."

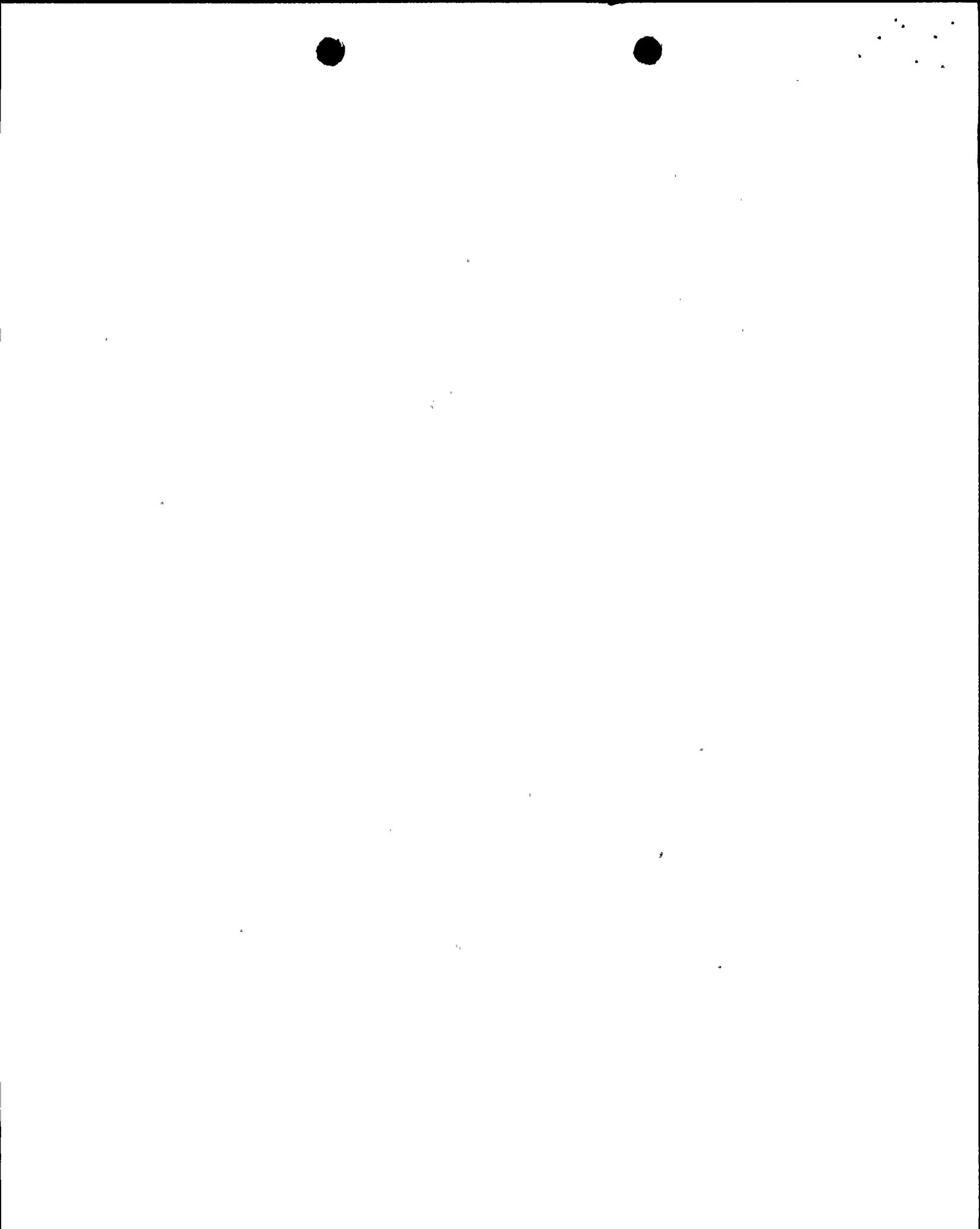


In regard to the uncertainties in the accident consequences identified in WASH-1400, the Review Group made these observations:

"There is much disagreement about the details of the estimates made by the WASH-1400 team charged with making the disease and mortality estimates. For example, although all the members of the WASH-1400 team contributed their full and honest efforts to the task, the spectrum represented by that team was not broad enough to encompass the full range of scholarly opinion on the subject. This led the WASH-1400 team to make estimates with a narrower range of stated 'uncertainty' than would otherwise have been the case."

By any standard, WASH-1400 represents one of the most comprehensive inquiries into nuclear safety ever carried out by the NRC. Even if one questions the validity of the absolute probabilities in WASH-1400 for the Diablo Canyon LPTP, as we do here, it is still clear that WASH-1400 produced a body of useful analysis that significantly advances the technical understanding of nuclear power reactor safety. Equally clearly, there is still a range of technical views on the absolute probabilities and the uncertainty error bounds associated with the conclusions of WASH-1400-type risk assessments. We believe that nuclear power regulators must not uncritically accept the absolute numbers resulting from generic reactor risk assessments. Victor Gilinsky, one of the five NRC Commissioners, cautioned in a November 15, 1979 presentation as follows:

".....the truth is that for all the elaborate reviews, computer accident scenarios and the extensive regulatory requirements so onerous to the utilities, most of the regulatory technicians---along with their industry counterparts---believed, deep down, they were only gilding the lily with their safety rules, that accidents were remote, that nuclear power plants did not pose serious risks, that the important possibilities had been covered.....The basic flaw in the system, then, was the secondary priority assigned to questioning and improving safety, an attitude legitimized by the astronomically small risk estimates of the Rasmussen Report. The complacency, and ultimately the sheer sloppiness, of the nuclear enterprise which so appalled the Kemeny Commission and led it to call for a 'fundamental change in attitude' was the result. Three Mile Island shattered that complacency."  
(emphasis added)



Thus, we believe that the numerical findings and conclusions developed in WASH-1400, and extrapolated to Diablo Canyon LPTP in Supplement 10 of the SER, must be applied with caution and judgment.

The following additional information addresses other aspects of the specific proposed admissions:

- a. (Admission 21) Specific Diablo Canyon fault trees and event trees necessary to quantify the numerical conclusions have not been developed. In addition, for one of the potential contributors, small break LOCAs, the evaluation is being revised by Westinghouse (see Item F in Applicant's February 13, 1981 letter to the NRC).
- b. (Admission 22) Consequences may be reduced as a result of reduced fission product inventory. Risks will similarly be reduced if accident probabilities for Diablo Canyon are consistent with WASH-1400. However, if Diablo Canyon accident probabilities during LPTP are higher than the WASH-1400 estimates, the risk to the public may not be proportionally reduced.
- c. (Admission 23) No specific isotope-by-isotope study is supplied to support this general conclusion.
- d. (Admission 24) Greater time may be available. However, during and following the LPTP, certain accident sequences during shutdown conditions (with reactor head removed and containment open, for example) may reduce the barriers delaying radiation releases.
- e. (Admission 25) See Admission 24. Also, no specific studies of Diablo Canyon have been cited to support the numerical estimates.
- f. (Admission 27) See Admission 24 and 25.
- g. (Admission 28) We assume the interrogatory refers to Admissions 26 and 27 rather than 25 and 26. The wording of the admission is vague. Clearly, there are some accident sequences, in WASH-1400 for example, which are irrelevant during the proposed LPTP. However, there may be other plant-specific sequences which may be relevant.



- h. (Admission 29) The proposed admission is so vague as to be unanswerable. For example, detailed definitions and description of "additional level instrumentation," "materially," and "large amounts of time" are required to make specific this proposed admission.

Admissions B-1 to B-3 and B-5 to B-11:

Joint Intervenors' specific issues with regard to the Diablo Canyon emergency planning status are described in detail on pages 186 to 205 of the transcript of the January 28, 1981 pre-hearing conference and in Joint Intervenors' March 9, 1981 letter to Denton. Further, the Applicant's failure to meet the emergency planning requirements prescribed by the NRC in NUREG-0737 is clearly acknowledged in the Applicant's February 27, 1981 letter to Denton of the NRC requesting relief from Items III.A.1.1 and III.A.2 of Enclosure 2 to NUREG-0737. In addition, in the February 27 letter, the Applicant also acknowledges the incompleteness of both the present site and off-site plans in the admission that "PG&E is actively engaged in upgrading its site emergency plan and working with state and local authorities in upgrading their emergency plans." In short, the TMI-2 accident, and the subsequent investigations, all have shown that the emergency planning measures in effect in 1979, measures similar to the past Diablo Canyon plans, were in many aspects inadequate. Chapter III of the TMI Action Plan (NUREG-0660) describes many of these generic inadequacies in detail.

The specific inadequacies in the implementation of old county and state emergency plans for Diablo (those referenced in Supplement 10 of the SER) were verbally communicated to Denton of the NRC by state and county officials during Denton's 1980 visit to the Diablo Canyon site. These officials communicated that the past (or "present," as characterized by the NRC) emergency planning measures were unsatisfactory to protect the health and safety of the public. Subsequent to the meeting with Denton, the Office of Emergency Services of the State of California has received a report from SAI, Incorporated, describing the potential consequences of Class 9-type accidents. Based on this report, OES recommended that an expanded plume exposure EPZ and expansion of the area requiring sheltering and subsequent relocation.

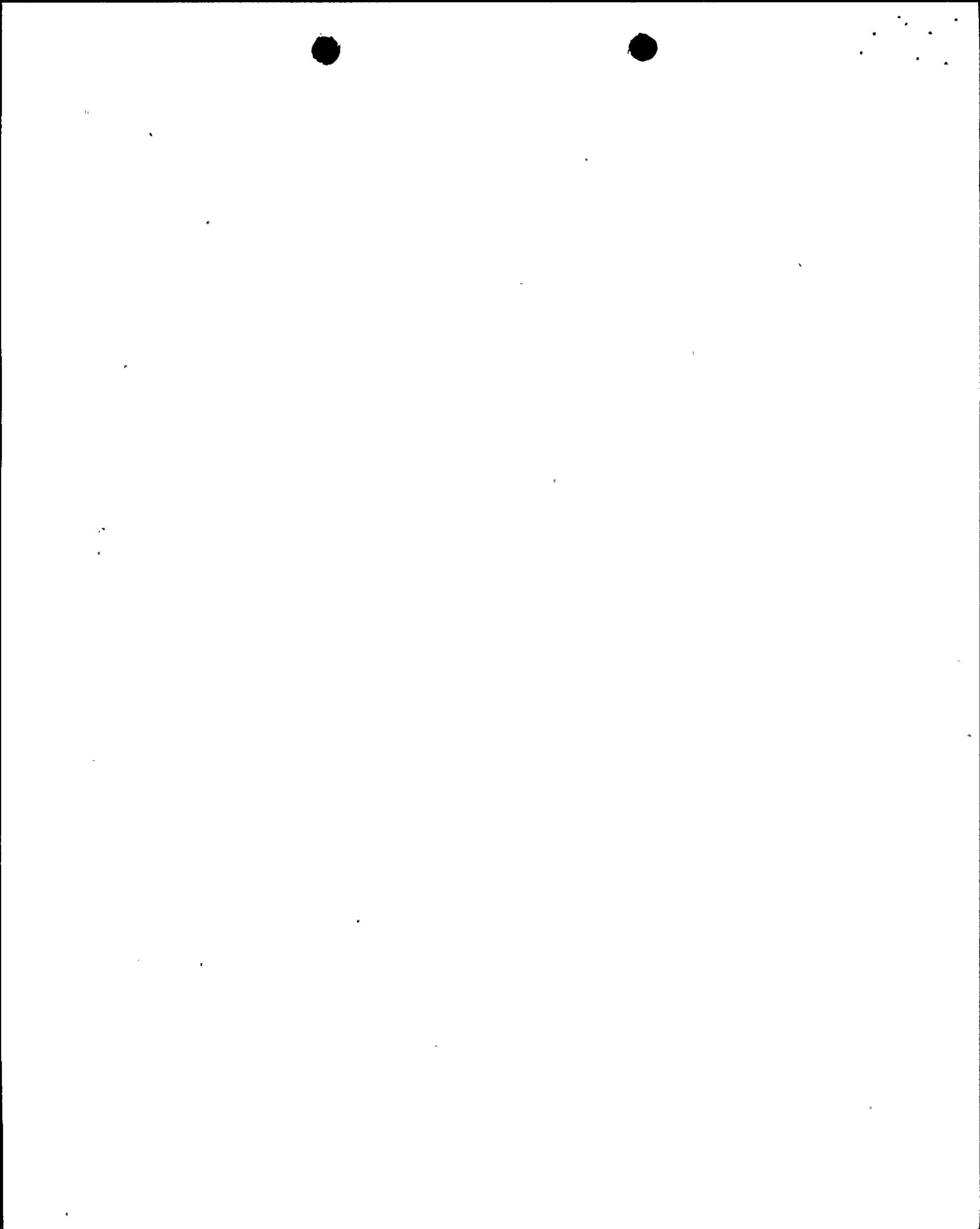


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In approximately November 1980, the County of San Luis Obispo contracted with P.R.C. (Planning Research Company) Voorhees Company to develop the draft of an emergency plan for potential Diablo Canyon accidents. The draft plan was intended to be issued within approximately six months for review by the Board of Supervisors, and ultimately the State of California. Following acceptance of the P.R.C. Voorhees plan, the County will enter into a second phase of emergency plan development which will include buying and installing the hardware, and implementing the procedural measures. We understand that this second phase may not be completed until 1982. Further, we are aware that a preliminary draft of the Voorhees report was sharply criticized at a recent public meeting sponsored by the Board of Supervisors in that Voorhees has conducted no detailed analysis of earthquake damage as it relates to the operation of the emergency plan.

The following additional information is provided in response to the proposed admissions:

- a. (Admission B-1) The Applicant submitted a revised emergency plan in February 1980 and subsequent letters and other documents expanding and revising the plan (for example, the February 25, 1981 submittal to the NRC concerning the upgraded meteorological program for emergency preparedness). As discussed on page III.B.2 of Supplement 10 of the SER, we understand that the Applicant's plan is still under review by the NRC. Therefore, we are not able to determine the extent of the emergency plan which will be in effect during the proposed Diablo Canyon LPTP. Further, we interpret that the term "licensee" as used in the proposed admission refers to the license "applicant."
- b. (Admission B-2) The past San Luis Obispo County emergency plan was not fully implemented, and the future plan being prepared by Voorhees does not yet exist. Therefore, the status of emergency plans during any proposed Diablo Canyon LPTP will depend on the timing of such tests. As described in the preceding, the State plan is also being developed by OES.



- c. (Admission B-3) We agree that the fission product inventory accumulated during the proposed LPTP should be less than the amount of fission product inventory that accumulates during full power operation. The term "small" in the proposed admission is not quantified and thus lacks a specific basis. In addition, see response to proposed Admission A-21 to A-29.
- d. (Admission B-5) We believe that the term "small fraction" has not been quantified and thus lacks the necessary specific basis. Also, see response to proposed Admission B-3.
- e. (Admission B-6) We believe that there are presently no County plans now in force as required by NUREG-0737. Also, see response to proposed Admission B-2.
- f. (Admission B-7) Same as response to proposed Admissions B-6 and B-2.
- g. (Admission B-8) Same as response to proposed Admission B-7
- h. (Admission B-9) We believe that the terms "immediate" and "any" are so general as to not permit acceptance of this proposed admission at this time. Also, see response to proposed Admission B-1 concerning the status of the Applicant's plan.
- i. (Admission B-10) Same as response to proposed Admission B-8.
- j. (Admission B-11) We believe that the terms "additional off-site protective actions" and "significantly" are so general as to not permit acceptance of this admission. Also, see response to proposed Admission B-2 concerning the status of the state and county plans

In summary, we believe that implementation of a well planned emergency response plan could reduce the prompt health effects resulting from an accidental radioactive release through the air or liquid pathways from the Diablo Canyon site. The emergency response to the TMI-2 accident once again teaches that state and local planning efforts are not adequate. In theory, response plans may appear adequate, but in practice they do not work. Aspects of emergency planning which should be addressed in the Diablo Canyon



safety assessment include design accident size, automated alarming and initiating systems, health treatment facilities, local population growth, nearby facility siting criteria, public training measures, and dose reducing methods.

Admission C-2:

Joint Intervenors cannot be sure of the magnitude and nature of loads and transients on the diesel generators at the time the heater loads may be added to the generators. If the prior loads are large enough, the added heater load could cause a transient in the form of a voltage drop.

Admission C-3:

This statement may in general be true, but Joint Intervenors are uncertain about its accuracy under accident conditions. The drawings provided in the Applicant's submittal do not identify the safety grade and qualification requirements of the control switches and contacts which perform the heater control functions and the SI lock-out feature (Drawing III-B-15; Rev. 1).

Admission C-4:

Although admitted by the Joint Intervenors, this statement assumes that the K608 contacts shown on Applicant's drawing III-B-15, Rev. 1, is safety grade and thus can be counted as available during accident conditions.

Admission C-7:

There are devices shown on the Applicant's drawings which should perform the functions in the statement but there is no data on their safety classification or qualification for accident conditions. Thus, there is no assurance of their accuracy or availability during or following an accident.



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Admissions C-8 and C-9:

The proposed procedures have not been demonstrated as viable and reliable under all accident conditions and appear to require operators to enter a potentially hot zone to implement part of the transfer of heater control functions. There is an increased possibility of action specified in applicable procedures being prevented due to adverse post-accident conditions or of operator errors due to the conditions imposed by the locations.

Admission D-4:

The statement is generally true but it implies that this is the only function for the PORVs and that they would not be used during normal operating or accident conditions.

Admission D-6:

Joint Intervenors cannot admit to this statement without reviewing the assumptions and analysis used as a basis for the numbers shown.

Admission D-7:

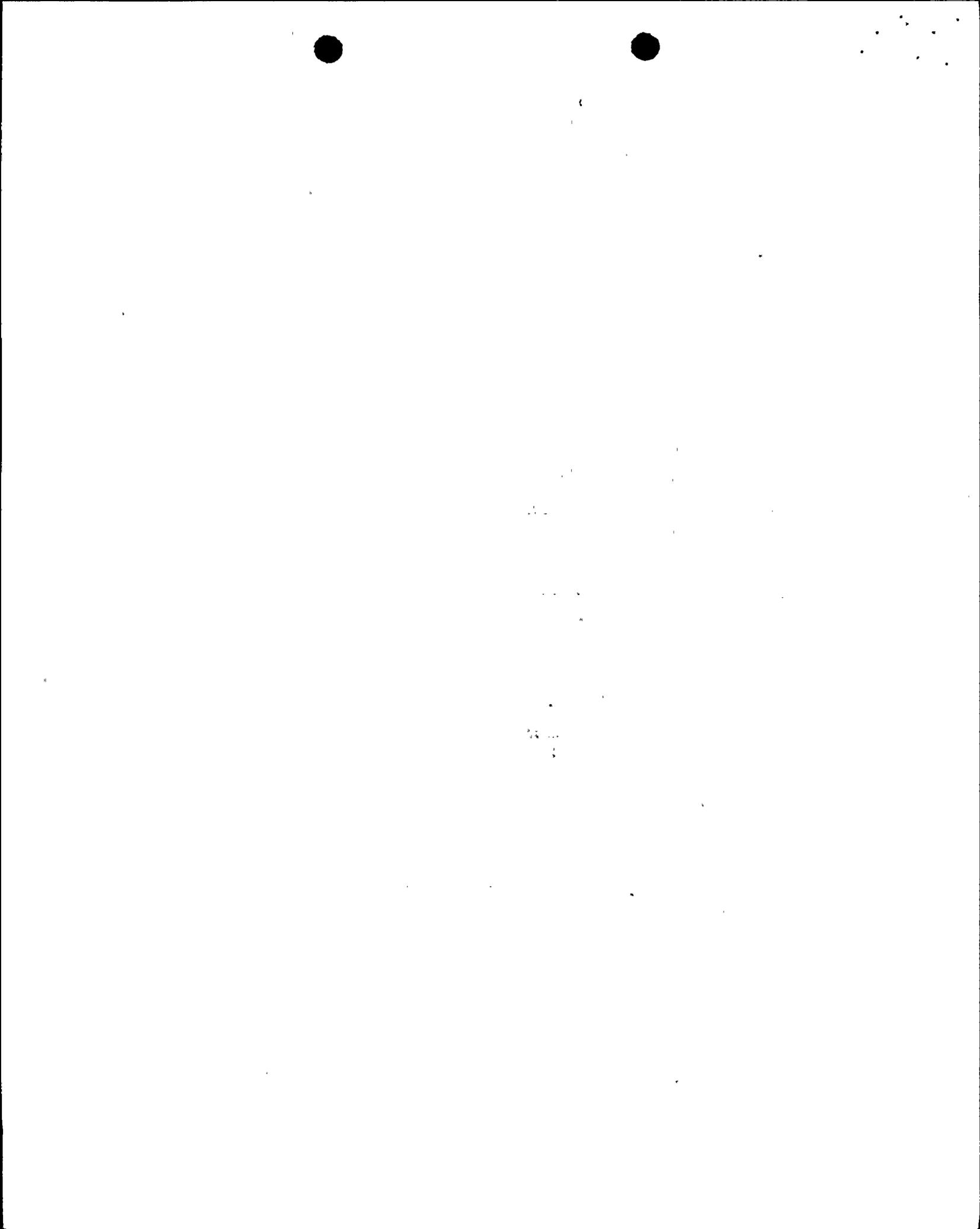
Joint Intervenors cannot admit to this statement because it is unclear to whose "designation" it refers. If it is the designation of safety classification given in the FSAR, the statement may be correct. Joint Intervenors continue to believe, however, that the function of a block valve in a small LOCA (e.g., stuck open PORV) is important to safety.

Admission D-9:

The control room indicator shows the intended position of the valve but does not ensure against erroneous indications due to passive valve failure or equipment failure.

Admission D-10:

Overpressure conditions have occurred at nuclear power plants. See, e.g., Task Action Plan A-26 "Reactor Vessel Pressure Transient Protection (Overpressure)." There have also been failures of pressure operated valve functions at nuclear plants. However, in the narrowest sense (that is,



by ignoring overpressurization when the vessel is below operating temperature), the statement may be true.

RESPONSE TO INTERROGATORY 2 (cont.)

- c. At this time, Joint Intervenors have not decided which expert witnesses, if any, they will rely on regarding their disagreements with the statements of admission.
- d. The documents which are relied upon in disagreement with specific statements of admission are referred to in our responses to interrogatories 2a) and 2b).
- e. The articles the intervenors are relying on in disagreements with specific statements of admission are referred to in our responses to interrogatories 2a) and 2b).

RESPONSE TO INTERROGATORY 3:

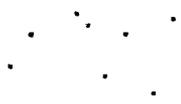
As stated in 2c), no expert witnesses have been identified at this time.

RESPONSE TO INTERROGATORY 4:

- a. It is the Applicant's burden to demonstrate compliance with all applicable provisions of the Commission's emergency planning requirements. Until such compliance has been demonstrated by the Applicant, Joint Intervenors do not concede that any of the provisions of the Commission's "Final Regulations on Emergency Planning," 45 Fed.Reg. 55402 (August 19, 1980), has been met, either by the Applicant or offsite agencies.

However, the specific provisions of those regulations which have not been complied with include, but are not necessarily limited to, the following:

10 C.F.R. § 50.47(a)(1), (a)(2), (b)(1) through (b)(16), (c)(1), (c)(2), and Appendix E Parts III and IV.



b. The deficiencies in compliance with the provisions specified above include, but are not necessarily limited to, the following:

(a) (1) -- No finding has yet been made by the NRC based on the Commission's "Final Regulations on Emergency Planning" that either the Applicant's onsite emergency plans or the relevant state and local plans "provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency."

(a) (2) -- FEMA has not yet reviewed the relevant state and local plans to assure compliance with the Commission's "Final Regulations on Emergency Planning" and NUREG-0654 FEMA-REP-1, Rev. 1.

The State of California plan is currently being revised; a local plan is being developed.

(b) (1) through (b) (16) -- Neither the Applicant, state nor local emergency plan has been completed or approved. Therefore, it is not now possible to determine precisely what provisions those plans will contain or the extent to which they will comply with the Commission's regulations or the criteria contained in NUREG-0654, FEMA-REP-1, Rev. 1. More importantly, however, there is no assurance that the requisite definitions, staffing, onsite-offsite interface, training, facilities, communications, capability, response capability, procedures, notification facilities, information dissemination procedures, monitoring methods and systems, radiological exposure control measures, medical services arrangements, periodic exercises, and recovery and re-entry plans have been developed or provided for. Similarly, even where provided, there is no assurance that they can be implemented because inadequate testing, exercises or drills have been conducted to assure that the plans are workable. Of special importance



at Diablo Canyon are the planning provisions for emergency response in the event of an earthquake combined with an accident at the facility. More than virtually any other nuclear facility in the country, Diablo Canyon, because of its vulnerability to earthquake damage, poses a danger of breach of containment at the site and destruction of roads -- including evacuation routes -- and facilities offsite. The Commission's obligation to protect the health and safety of the public requires that such a contingency be specifically considered in all emergency plans relevant to Diablo Canyon.

(c) (1) -- See March 9, 1981 letter to Denton from Joint Intervenor's counsel in response to February 27, 1981 letter to Denton from Malcolm Furbush.

(c) (2) -- When completed and approved, the Applicant, state, and local plans must comply with all requirements applicable to the EPZ's: plume exposure pathway and ingestion pathway. See response to Interrogatory 4.b. (b) (1) through (b) (16).

Appendix E Parts III and IV -- See response to Interrogatory 4.b. (b) (1) through (b) (16).

In addition, see responses to Interrogatory 2a) and proposed admissions B-1 to B-3 and B-5 to B-11.

- c. See response to Interrogatory 3.
- d. See response to Interrogatory 3.

RESPONSE TO INTERROGATORY 5:

- a. It is the Applicant's burden to demonstrate compliance with all applicable provisions of the Commission's emergency planning requirements. Until the Applicant has demonstrated compliance with Sections III.A.1.1 and III.A.1.2 of NUREG-0694 (now NUREG-0737), Joint Intervenor's do not concede that any of the provisions of those sections has been met.



However, the specific provisions of those sections which have not been complied with include, but are not necessarily limited to, the following:

III.A.1.1. UPGRADE EMERGENCY  
PREPAREDNESS

"Provide an emergency response plan in substantial compliance with NUREG-0654 . . . ."

"Perform an emergency response exercise to test the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations."

III.A.1.2. UPGRADE EMERGENCY SUPPORT  
FACILITIES

"Establish an interim technical support center . . . ."

"Establish an onsite operational support center . . . ."

"Designate a near-site emergency operations facility with communications with the plant to provide evaluation of radiation releases and coordination of all onsite and offsite activities during an accident."

- b. See responses to Interrogatory 4.b.(b)(1) through (b)(16); responses to Interrogatory 2a) and proposed admissions B-1 to B-3 and B-5 to B-11; February 27, 1981 letter to Denton from Furbush; March 9, 1981 letter to Denton from Joint Intervenor's counsel.

In addition, the emergency support facilities referred to in Section III.A.1.2 have not been tested to determine their adequacy in the event of a nuclear accident, particularly an accident accompanied by a significant earthquake. Nor has there been any demonstration that the communications network with state and local agencies will actually function as planned. In short, there is no assurance that the proposed facilities will function as intended.

- c. See response to Interrogatory 3.  
d. See response to Interrogatory 3.



RESPONSES TO INTERROGATORY 6:

- a. The provisions of NRC regulatory requirements that will be violated by Applicant's proposal include, but are not necessarily limited to, 10 C.F.R. Part 50, Appendix A, Criterion 17; 10 C.F.R. § 50.40(c); NUREG-0737, II.E.3.1. In addition, see responses to Interrogatory 2a) and proposed admissions C-2, C-3, C-7, C-8, and C-9.
- b. It is the Applicant's burden to demonstrate compliance with all applicable regulatory requirements. However, see responses to Interrogatory 2a) and proposed admissions C-2, C-3, C-7, C-8, and C-9.
- c. See response to Interrogatory 3.
- d. See response to Interrogatory 3.
- e. See responses to Interrogatories 6a) and 6b).
- f. See response to Interrogatory 6c).
- g. See response to Interrogatory 6c).

RESPONSE TO INTERROGATORY 7:

- a. 10 C.F.R. Part 50, Appendix A, Criterion 13; 10 C.F.R. § 50.55a(h); 10 C.F.R. § 50.40(c); NUREG-0737, II.F.2. In addition, see responses to Interrogatory 2a) and proposed admissions A-1 through A-29.
- b. It is the Applicant's burden to demonstrate compliance with applicable regulatory requirements. See responses to Interrogatory 2a) and proposed admissions A-1 through A-29.
- c. See response to Interrogatory 3.
- d. See response to Interrogatory 7c).
- e. See responses to Interrogatory 2a) and proposed admissions A-1 through A-29.
- f. See response to Interrogatory 7c).
- g. See response to Interrogatory 7d).



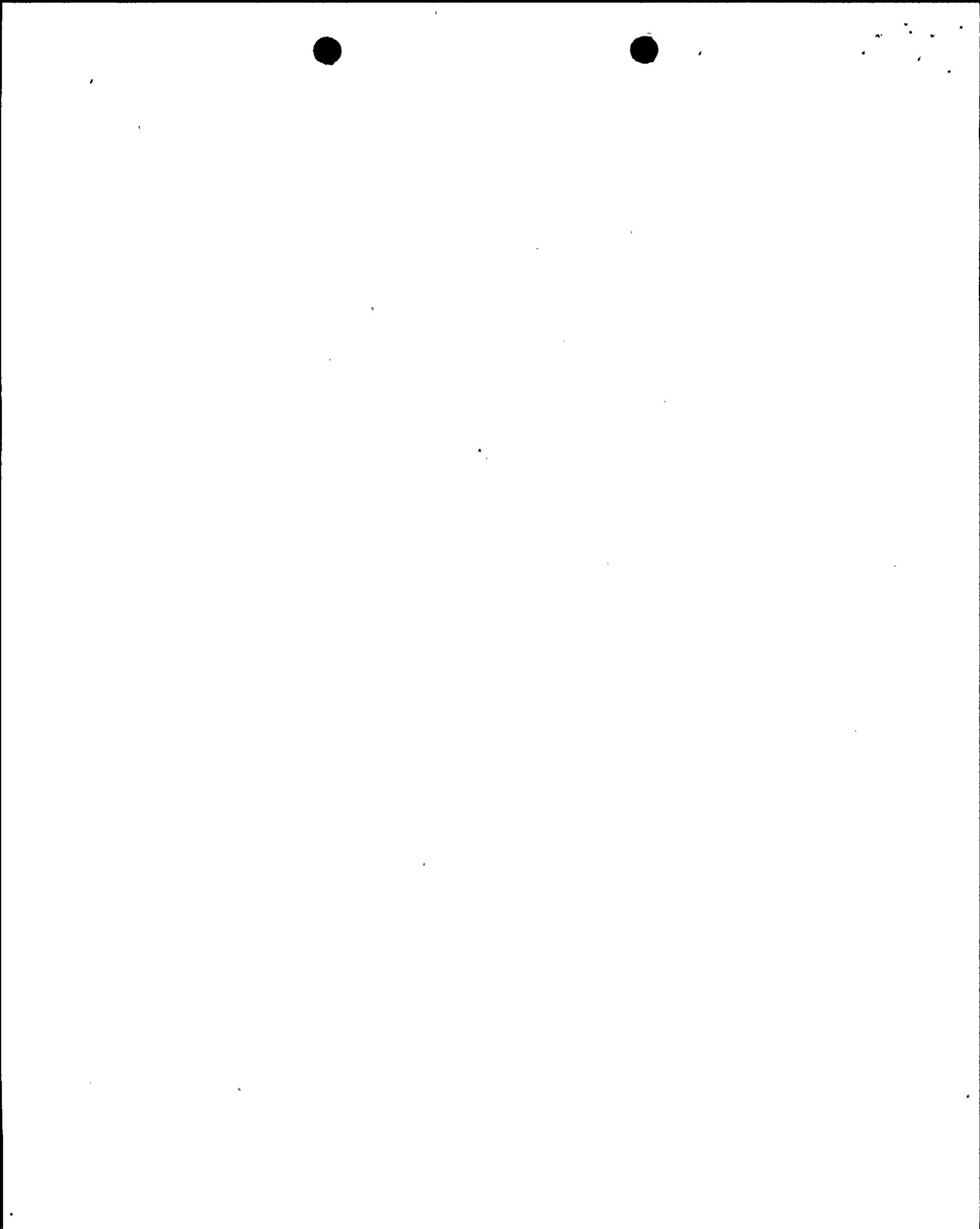
- h. (Omitted by NRC Staff.)
- i. The wording of this interrogatory prevents a response because it assumes that the meaning of terms such as "time . . . . increased significantly" and "risk . . . . substantially reduced" would be interpreted the same by all parties; such is not the case. In the case where these terms are interpreted as less of an ameliorating influence on safety concerns the need for early and complete implementation of a vessel water level measurement scheme is more easily understood.

RESPONSE TO INTERROGATORY 8:

- a. 10 C.F.R. Part 50, Appendix A, Criteria 1, 14, 15, and 30; 10 C.F.R. § 50.40(c); NUREG-0737, II.D.1. In addition, see responses to Interrogatory 2a) and proposed admissions D-1 through D-10.
- b. Appropriate qualification testing is necessary to verify the capabilities of these valves to function during normal, transient, and accident conditions. See responses to Interrogatory 2a) and proposed admissions D-1 through D-10.
- c. It is the Applicant's burden to demonstrate compliance with all applicable regulatory requirements. See responses to Interrogatory 2a) and proposed admissions D-1 through D-10.
- d. See response to Interrogatory 3.
- e. See response to Interrogatory 8d).

DOCUMENT PRODUCTION REQUEST:

Joint Intervenors believe that all documents referred to herein are filed in the Diablo Canyon proceeding or are publicly available.



Dated: March 16, 1981

Respectfully submitted,

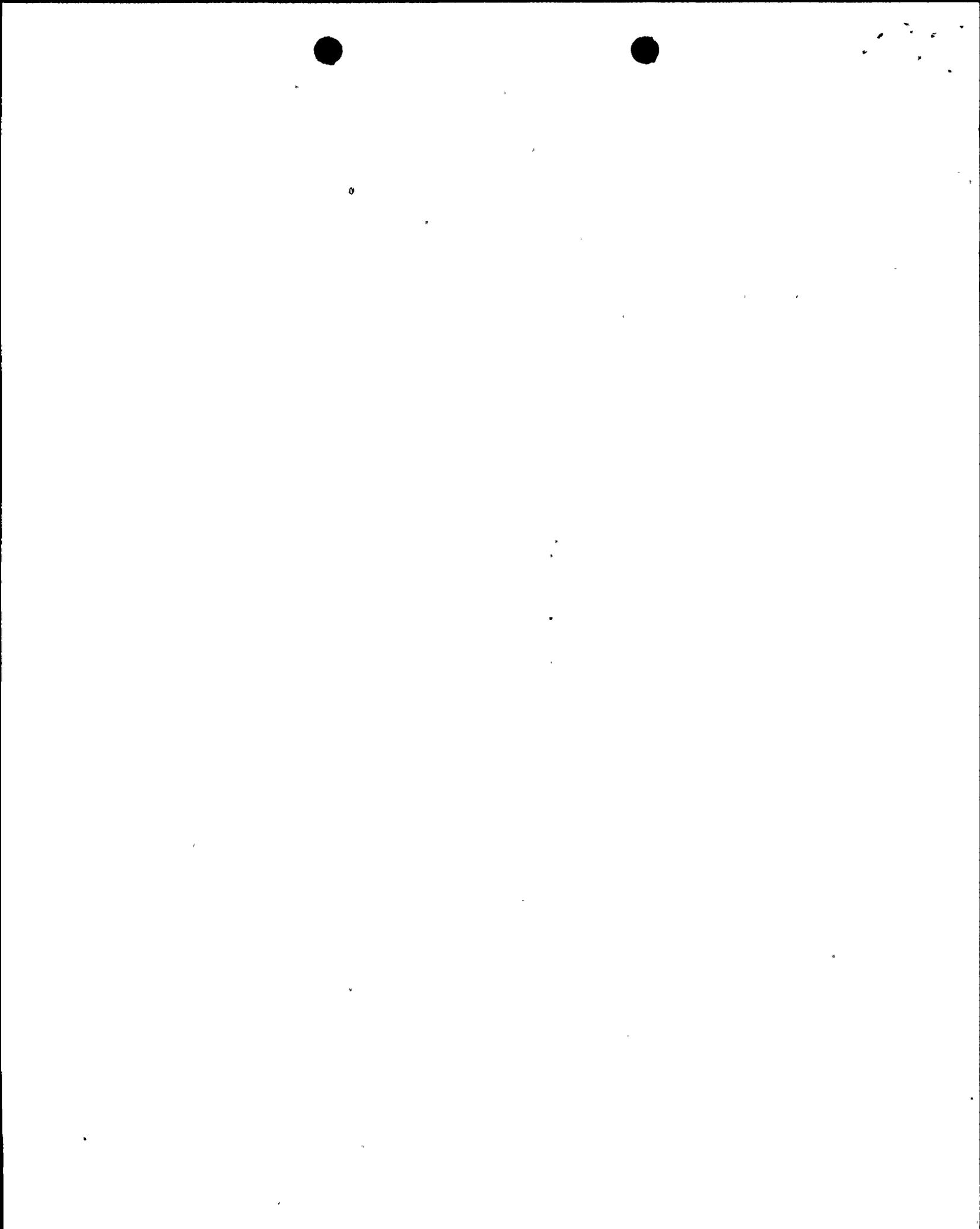
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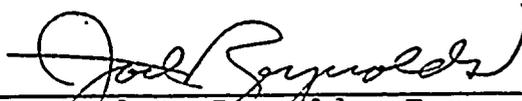
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