

UNITED STATES OF AMERICA

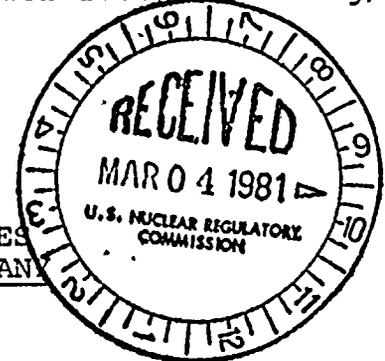
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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' INTERROGATORIES
TO PACIFIC GAS AND ELECTRIC COMPANY

Pursuant to 10 C.F.R. §2.740(b), the SAN LUIS OBISPO
MOTHERS FOR PEACE, SCENIC SHORELINE PRESERVATION CONFERENCE,
INC., ECOLOGY ACTION CLUB, SANDRA SILVER, GORDON SILVER,
ELIZABETH APFELBERG, and JOHN J. FORSTER ("Joint Intervenors")
hereby request that the attached interrogatories be answered
fully, in writing, and under oath by any officers or employees
of Pacific Gas and Electric Company ("Applicant") who have
personal knowledge thereof. The answer to each interrogatory
should contain the name(s) and identification of the person(s)
supplying the answer whether or not he or she has verified the
answer.

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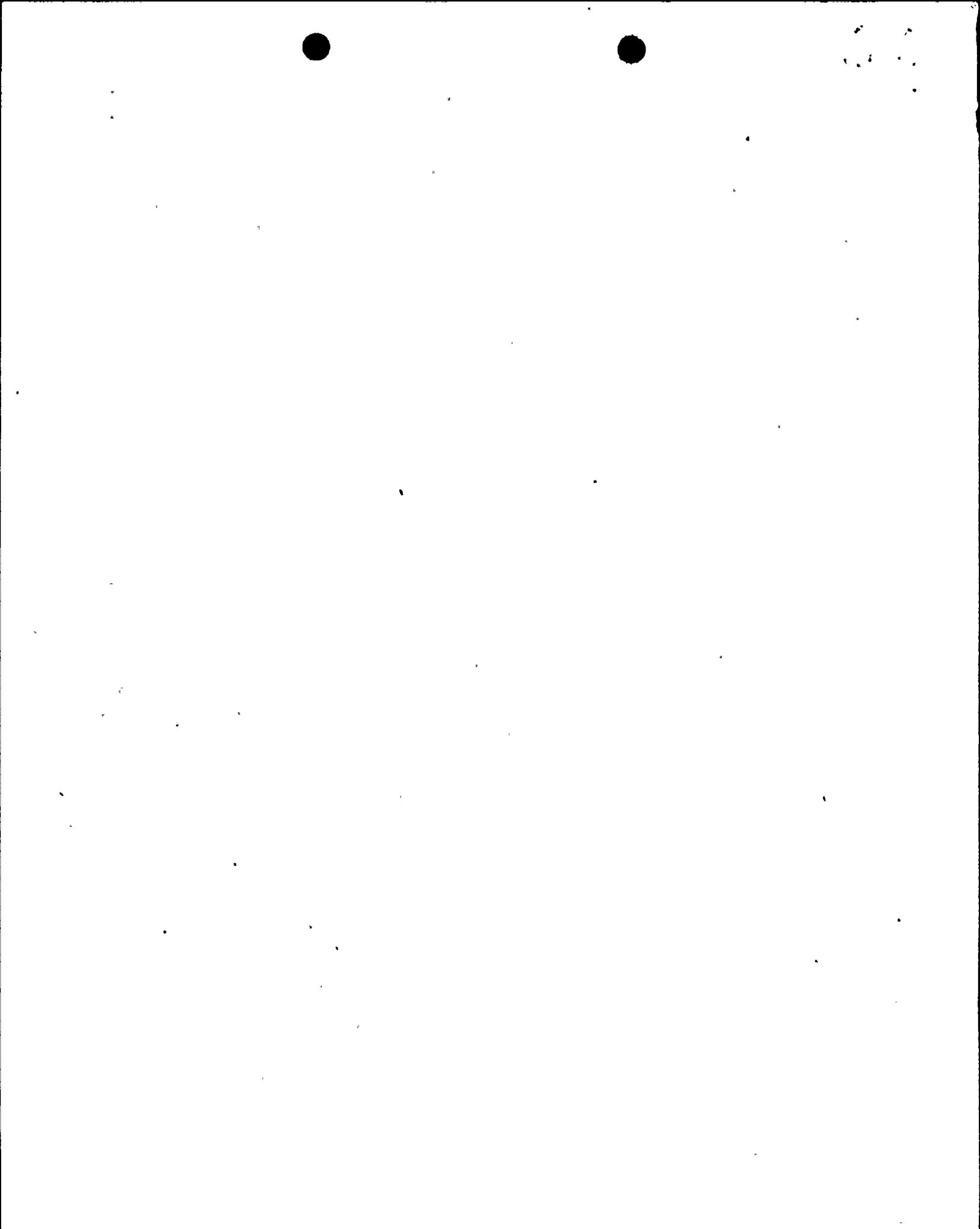
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Each question is to be answered in 5 parts as

follows:

- A. Provide the direct answer to the question.
- B. Identify all documents and studies, and the particulars thereof, relied upon by the Applicant now or in the past, which serve as the basis for the answer. In lieu thereof, at Applicant's option, a copy of such document and study may be attached to the answer.
- C. Identify all documents and studies, and the particular parts thereof, examined but not relied upon by the Applicant, which pertain to the subject matter questioned. In lieu thereof, at Applicant's option, a copy of each such document and study may be attached to the answer.
- D. Explain whether the Applicant and/or any independent contractor are presently engaged in or intend to engage in further research or work which may bear on the issues covered in the interrogatory. If so, please identify such research or work and the person(s) responsible therefor.
- E. (1) Identify the expert(s), if any, whom the Applicant intends to have testify on the subject matter covered in the interrogatory. State the qualifications of each such expert. (2) Present a summary of each expert's proposed testimony on each Joint Intervenors contention. (3) Identify all cases in which any such expert has previously testified and state the subject



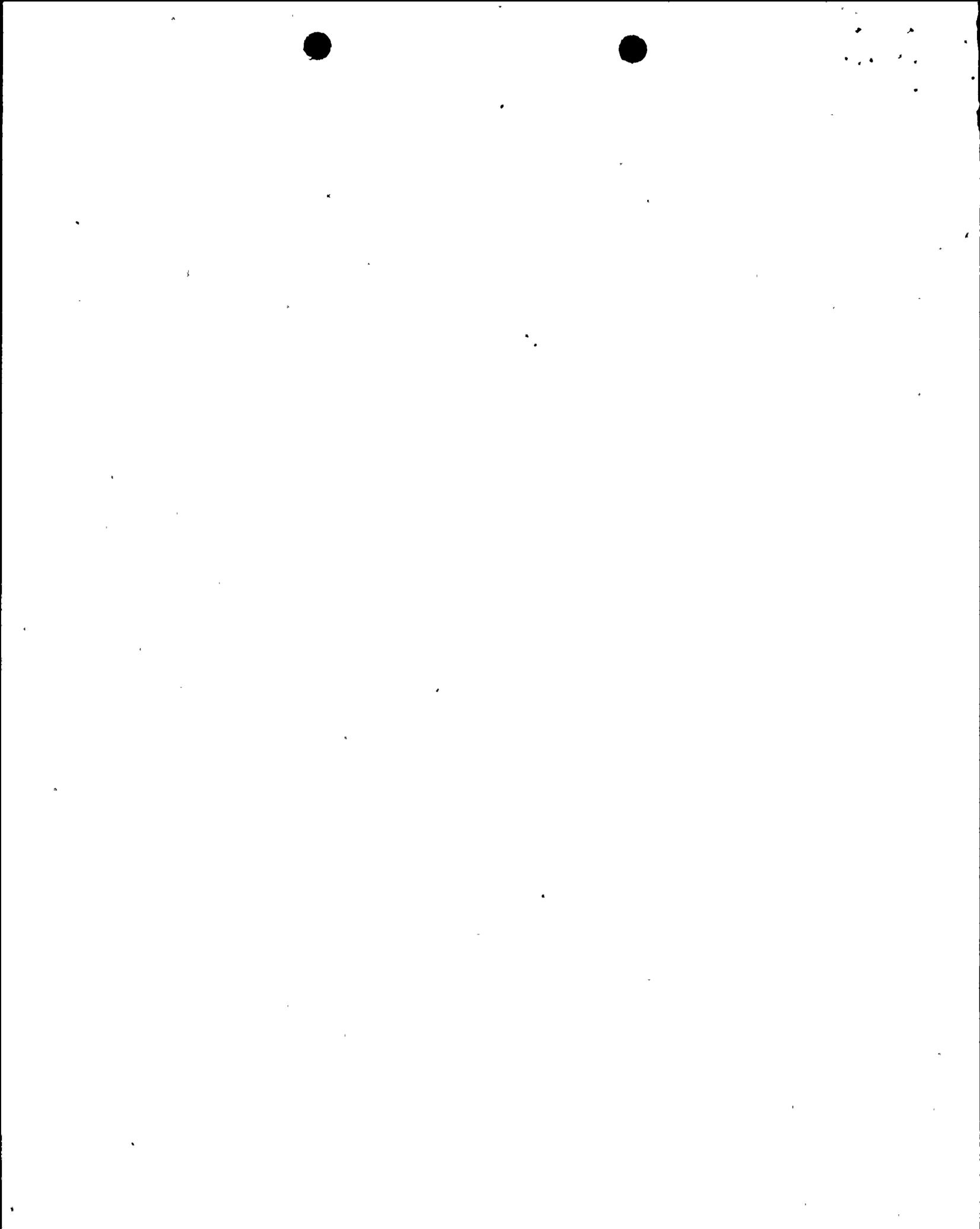
matter of such testimony.

Answer each of the following five preliminary questions for every contention:

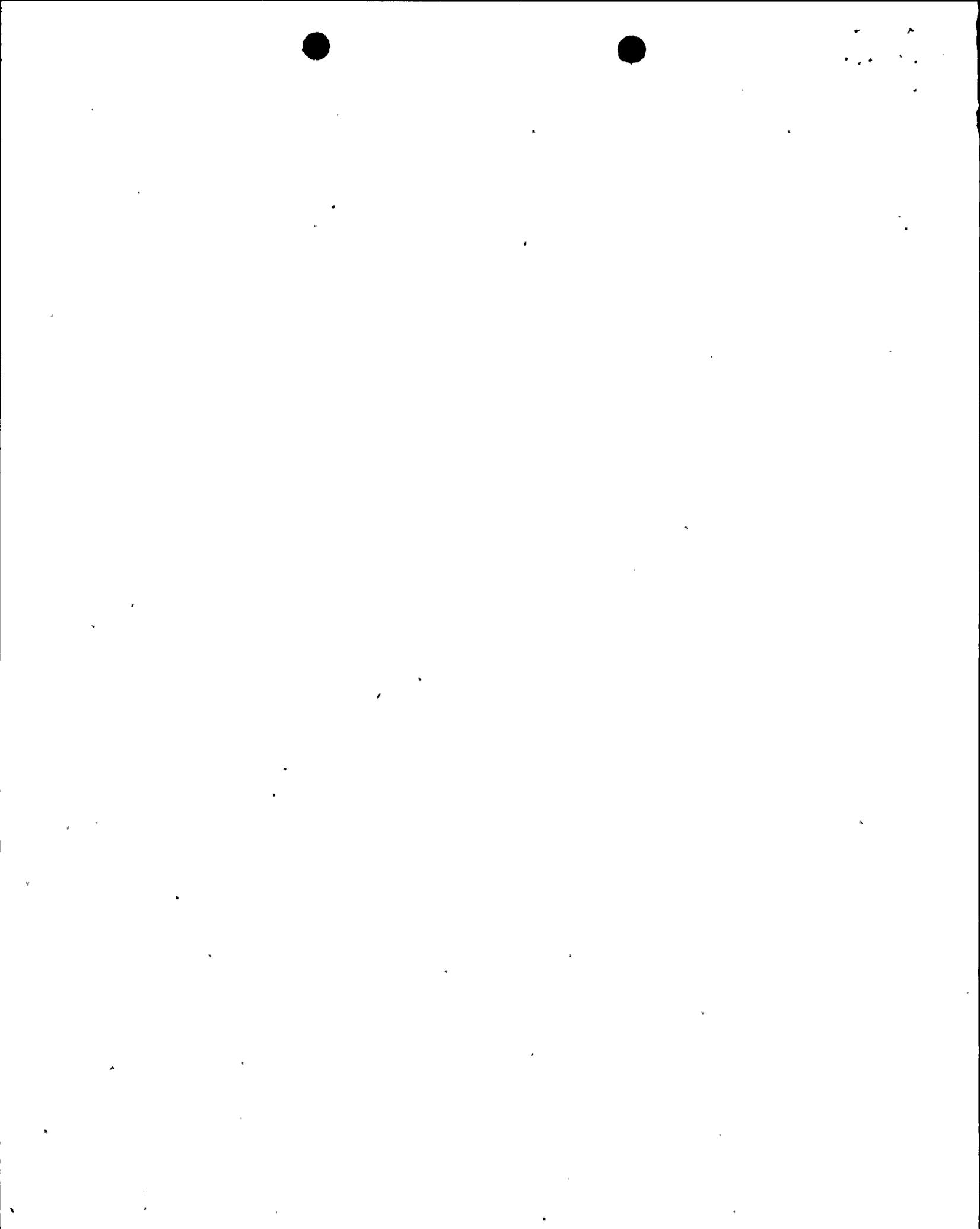
1. Explain the present Applicant position on Joint Intervenors contention N (N = number of contention).
2. Does the current position differ from the position of the Applicant in any prior proceedings? If so, identify the proceeding(s), explain the prior position, and explain the basis for the change in position.
3. Identify any officers or employees of, or consultants to, the Applicant who dissent from the present Applicant position on Joint Intervenors contention N. Explain the reasons for which any such person dissents.
4. Identify the specific sections and page numbers of the FSAR for Diablo Canyon and the NRC Staff's SER and SER Supplements for Diablo Canyon, which are relied upon in formulating the Applicant position on Joint Intervenors contention N.
5. Identify all sections and page numbers of the FSAR, SER, and SER Supplements which contain subject matter pertaining to Joint Intervenors contention N.

CONTENTION 4

- 1-5. Answer each of the five preliminary questions with respect to contention 4 and number the answers 1-5.

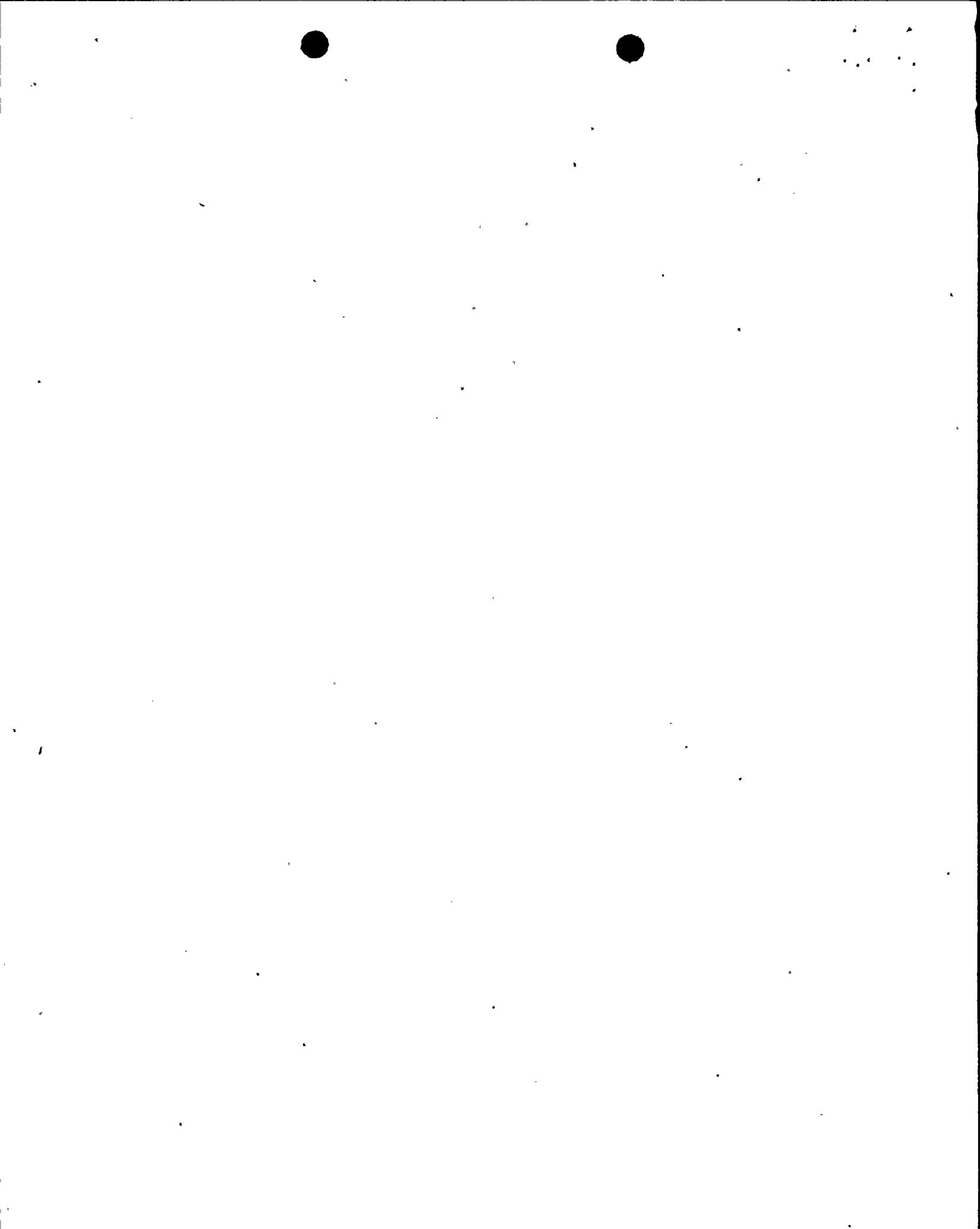


6. Does the Applicant contend that the Applicant, state, and local emergency response plans for Diablo Canyon as they are presently constituted comply with the Commission's revised emergency planning regulations, effective November 3, 1980 ("Final Regulations on Emergency Planning," 45 Fed. Reg. 55402 (August 19, 1980))?
7. If the answer to interrogatory 6 is yes, specify each and every fact supporting that answer.
8. If the answer to interrogatory 6 is no, does the Applicant contend that the Commission's revised emergency planning regulations need not be complied with prior to issuance of licenses to load fuel and conduct low power tests at Diablo Canyon? Specify each and every fact supporting the answer to this interrogatory.
9. If the answer to interrogatory 6 is no, using a section by section analysis, explain how and in what sections the Applicant, state, and local emergency plans do not comply with the Commission's revised emergency planning regulations.
10. Specify any and all revisions or changes to be made by the Applicant in the applicable emergency plans referred to in Joint Intervenors contention 4, and any and all actions which the Applicant intends to take, to eliminate prior to fuel loading at Diablo Canyon any deficiencies in those plans as they relate

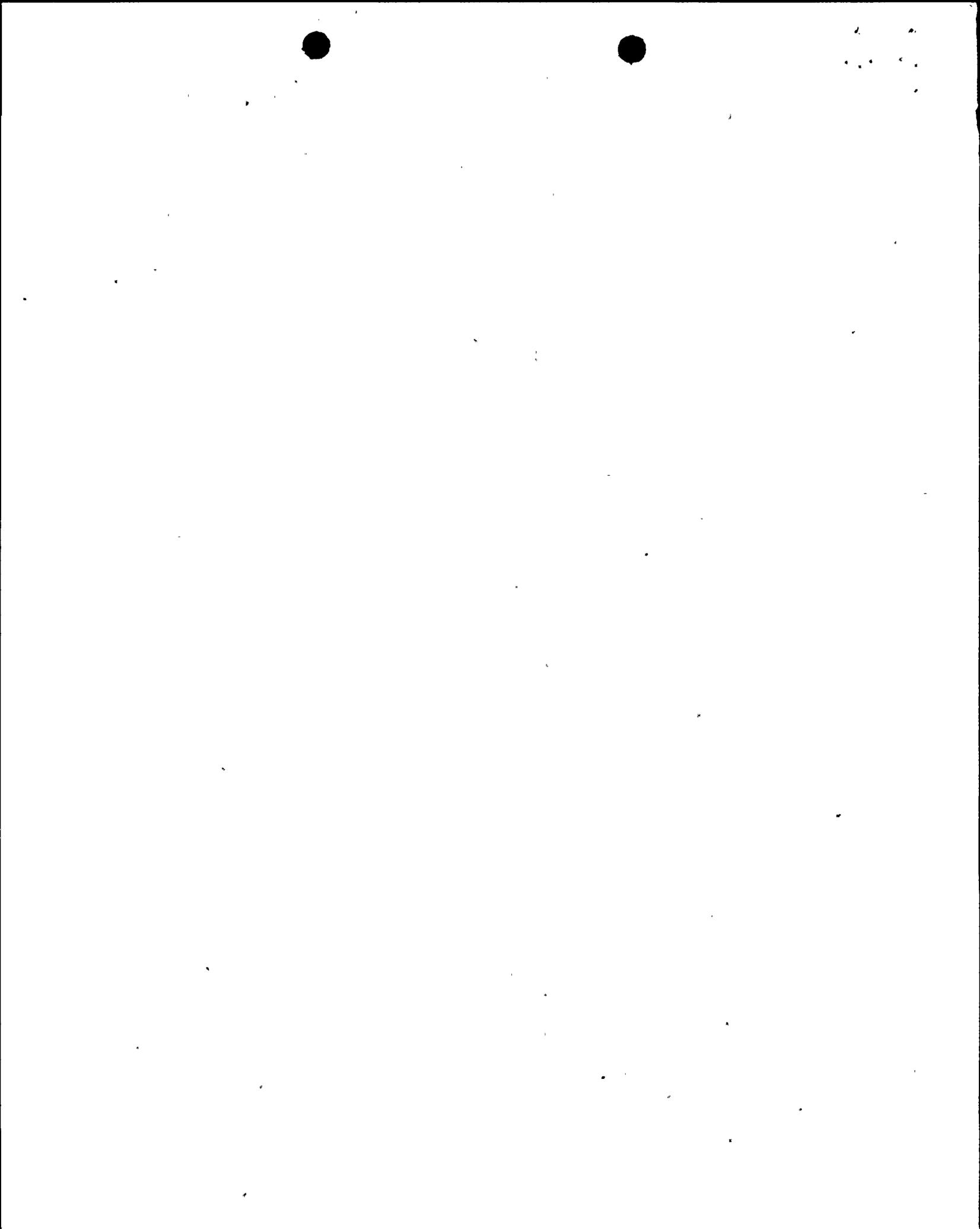


to the Commission's revised emergency planning regulations.

11. Specify what, if any, deficiencies in the Applicant, state, and local emergency plans as they relate to the Commission's revised emergency planning regulations will not be eliminated prior to fuel loading at Diablo Canyon.
12. With respect to any of the deficiencies specified in answer to interrogatory 11, explain why they are not significant for Diablo Canyon and what interim actions have been or will be taken to compensate for the deficiencies.
13. Explain how the public will be informed in advance about the appropriate protective actions which should be taken in the event of an emergency.
14. By what method will the public be notified of recommended protective actions during an emergency and how long will it take to notify all persons within 10 miles of the reactor?
15. Explain how the emergency response plan for Diablo Canyon takes into consideration the likelihood of "spontaneous" evacuation outside the 10 mile EPZ which may interfere with evacuation efforts within the EPZ.
16. Explain how spontaneous evacuation by the public will be discouraged.



17. To what distance would the entire 360 degree circumference of the reactor be evacuated, regardless of wind direction during a major atmospheric release?
18. Explain how the angle size and length of evacuation sectors will be determined.
19. What is the spectrum of radioactive plume speeds factored into the emergency response plan?
20. Explain how the decision will be made whether to order sheltering or evacuation during an atmospheric release of radioactivity. What factors will be considered in making the decision? What criteria will be applied to decide when to evacuate as opposed to when to shelter?
21. Who will order the appropriate protective action for the public and on the basis of what information and criteria?
22. In endorsing the concept of EPZ planning guidance, the Commission stated "it is appropriate and prudent for emergency planning guidance to take into consideration the principal characteristics . . . of a spectrum of design basis and core melt accidents." 44 Fed.Reg. 61123 (October 23, 1979). Explain how the Diablo Canyon emergency response plan considers the principal characteristics of a spectrum of core melt accidents.

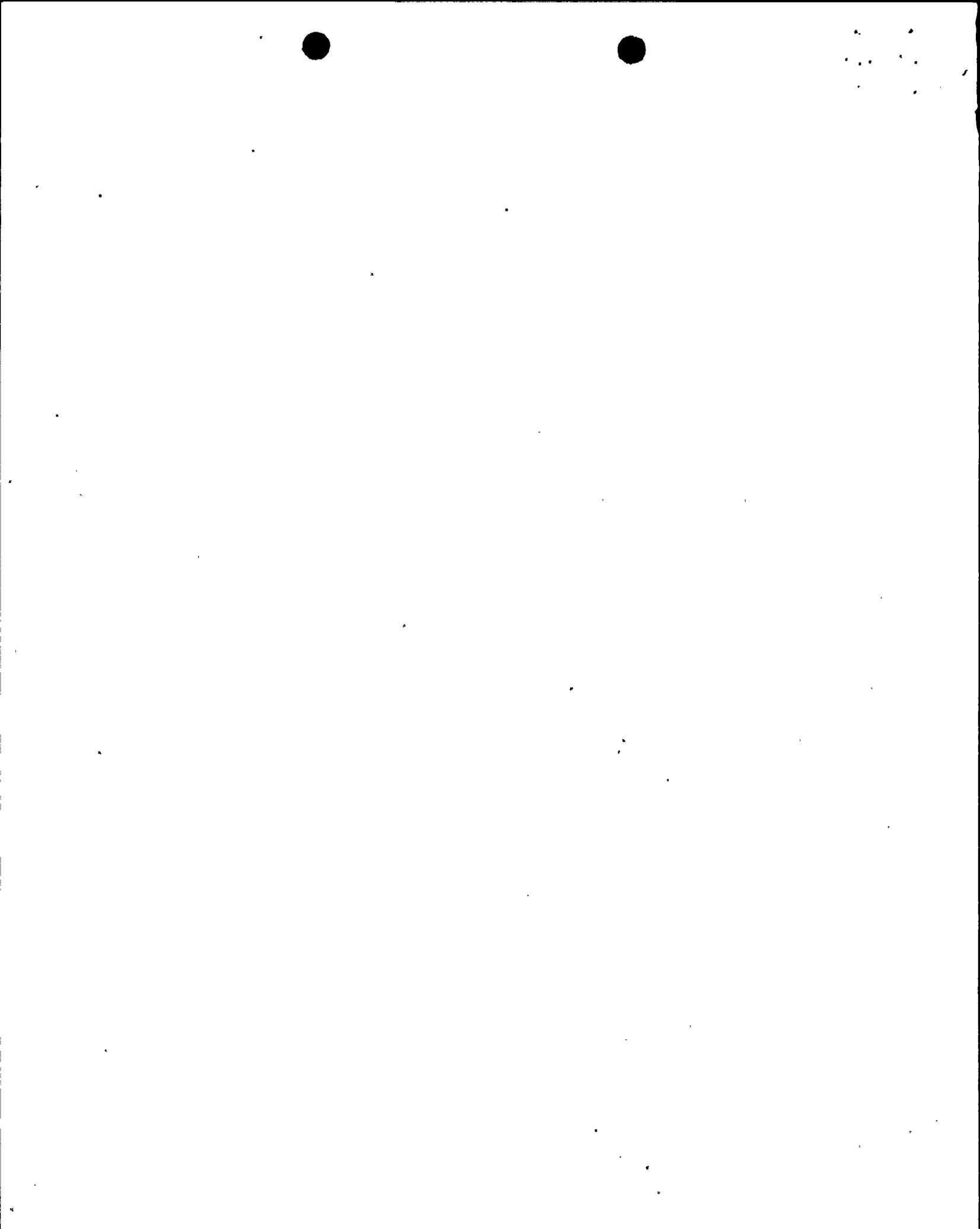


CONTENTION 5

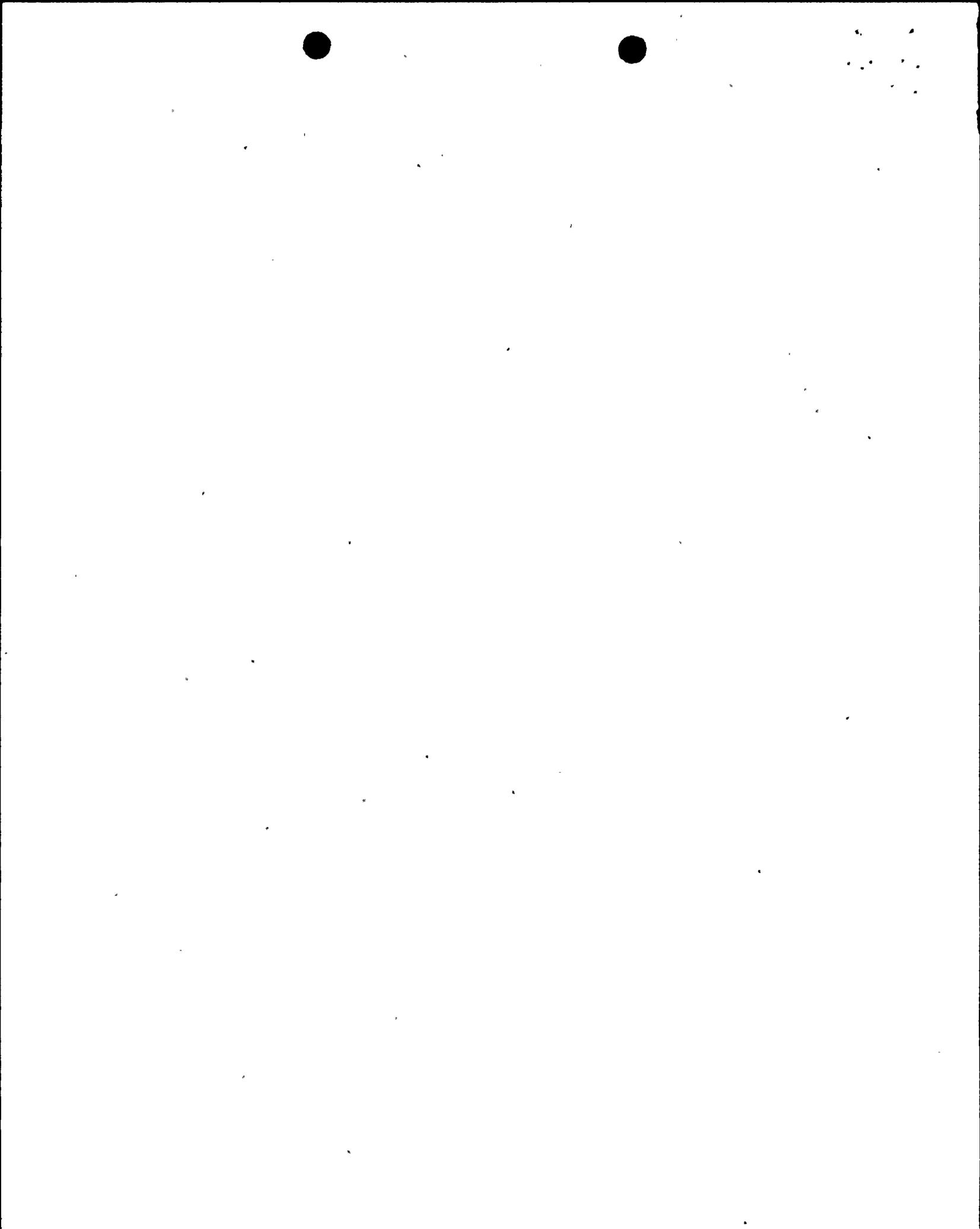
- 23-27. Answer each of the five preliminary questions with respect to contention 5 and number the answers 23-27.
28. Does the Applicant contend that the Applicant, state, and local emergency response plans for Diablo Canyon as they are presently constituted comply with the requirements of Sections III.A.1.1 and III.A.1.2 of NUREG-0694?
29. If the answer to interrogatory 28 is yes, specify each and every fact supporting that answer.
30. If the answer to interrogatory 28 is no, specify in what respects the various plans cited do not comply with the requirements of Sections III.A.1.1 and III.A.1.2 of NUREG-0694, and explain what actions will be taken to remedy that noncompliance prior to fuel loading at Diablo Canyon.

CONTENTION 11

- 31-35. Answer each of the five preliminary questions with respect to contention 11 and number the answers 31-35.
36. Explain why the addition of the pressurizer heaters to the on-site emergency power supplies will not degrade the capacity, capability and reliability of the on-site emergency power source in violation of GDC 17.



37. Would installation of an independent and redundant on-site emergency power supply for the pressurizer heater provide greater reliability of power supply to pressurizer heaters? Explain your answer fully.
38. What procedures and training have been established to make the operator aware of when and how the required pressurizer heaters shall be connected to the emergency buses, under what conditions selected loads can be shed from the emergency power source to provide sufficient capacity for connection of the pressurizer heaters, and which loads can be shed?
39. Specify whether the changeover of the heaters from normal off-site power to emergency on-site power is to be accomplished automatically or manually in case of loss of off-site power.
40. If the changeover of pressurizer heaters is to be accomplished manually, would automatic changeover of the heaters to the on-site emergency power supply provide greater reliability of power supply to pressurizer heaters? Explain your answer fully.
41. Does the Applicant contend that each of the subpoints of the position and clarification set forth at pages 3-85 and 3-86 of NUREG-0737 is met at Diablo Canyon?
42. If the answer to interrogatory 41 is yes, specify each and every fact supporting that answer. Identify all relevant documentation, including system design description, logic diagrams, electrical schematics,

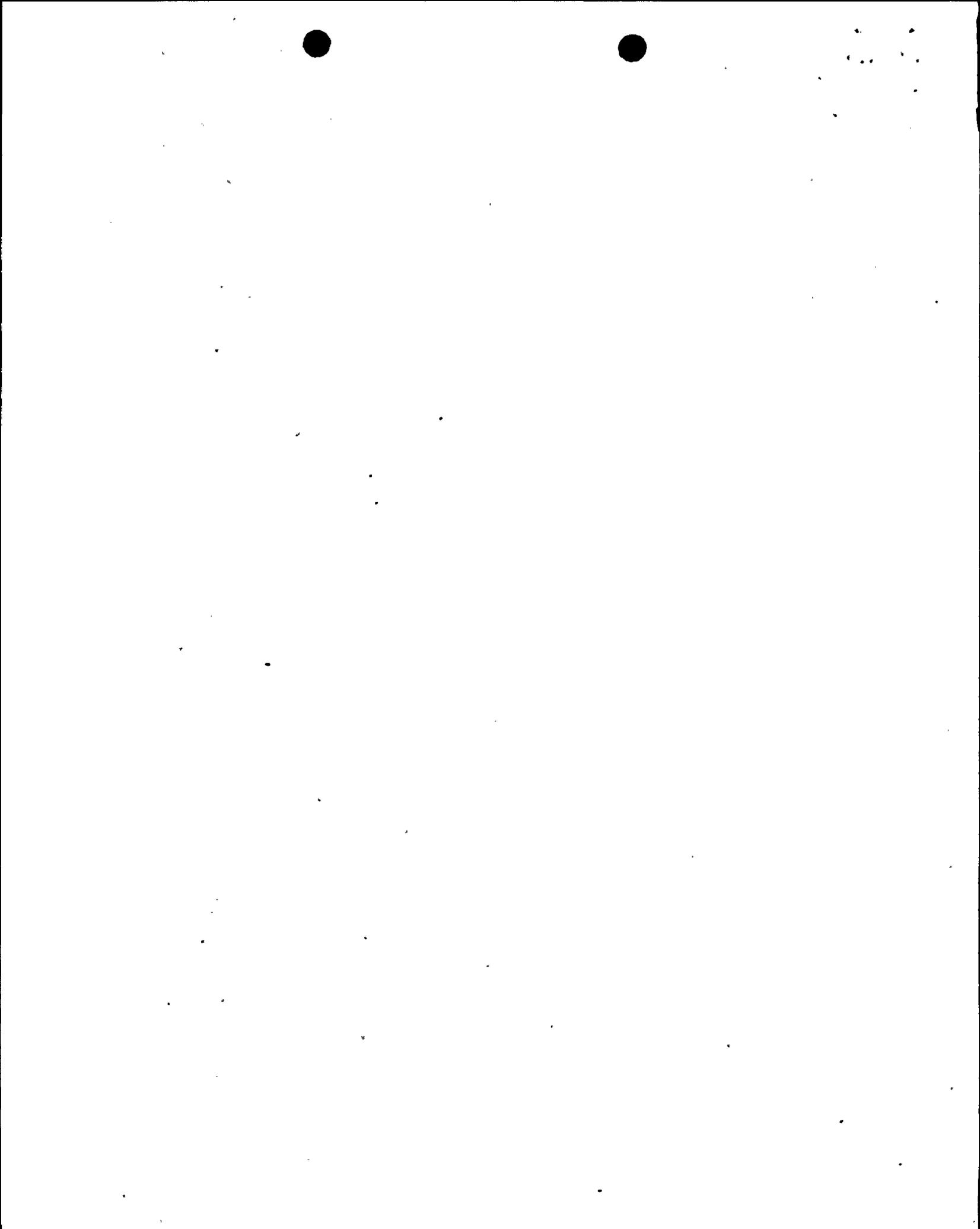


test procedures, and technical specifications.

43. If the answer to interrogatory 41 is no, explain how the position and clarification referred to have not been met, and specify any and all actions which the Applicant is taking or intends to take to assure compliance prior to fuel loading.

CONTENTION 13

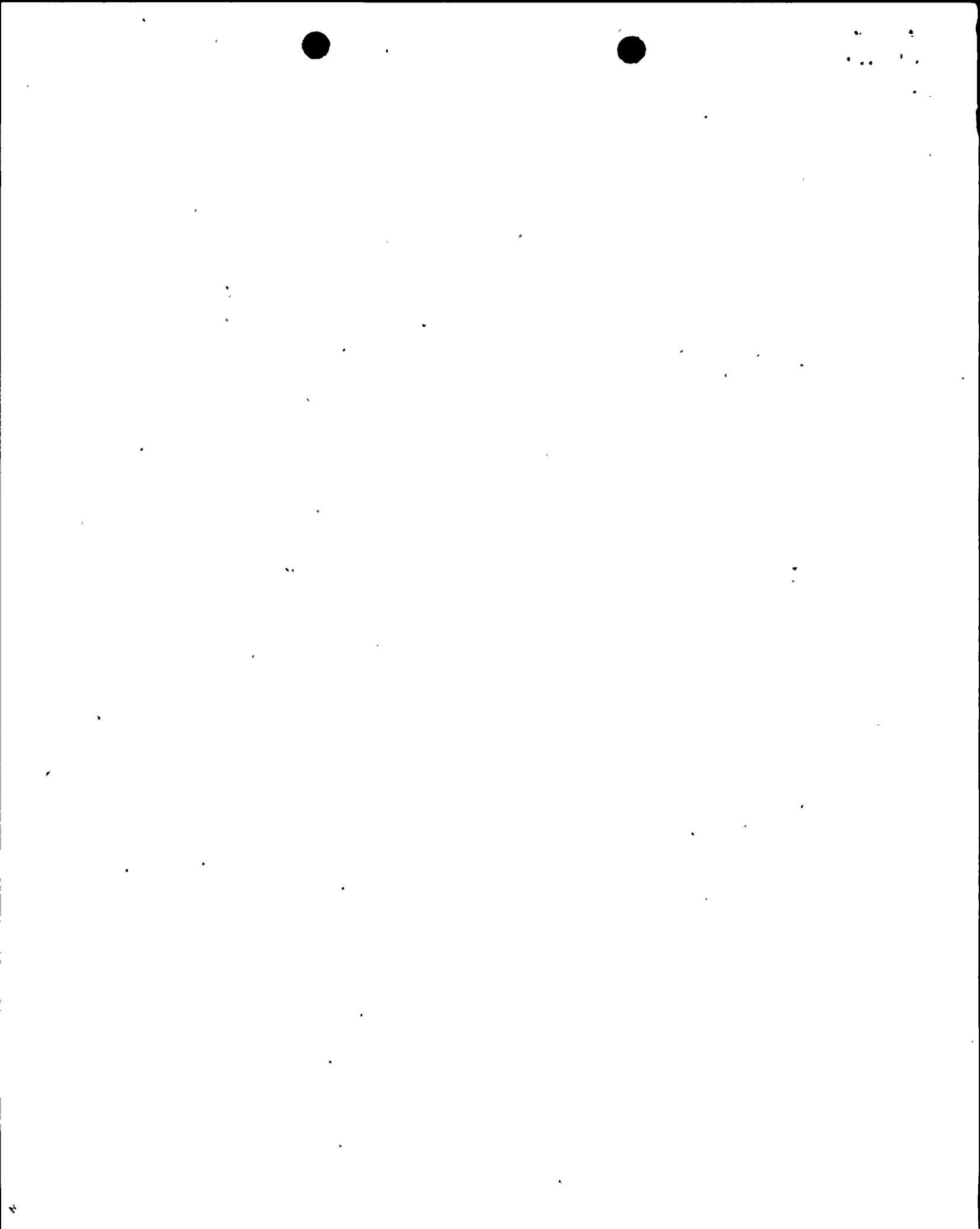
- 44-48. Answer each of the five preliminary questions with respect to contention 13 and number the answers 44-48.
49. Would a direct measurement of the reactor coolant level be of assistance to the reactor operator in determining the most appropriate remedial actions during a small break LOCA?
50. Explain how present procedures and instrumentation permit prompt recognition of low reactor coolant level and inadequate core cooling.
51. Does the Applicant contend that the instrumentation for detection of inadequate core cooling described in its response to Item II.F.2 of NUREG-0737 (submitted February 6, 1981) meets the concern of contention 13 that prior to fuel loading Diablo Canyon have a capability to measure directly the water level in the fuel assemblies? Explain your answer fully.



52. Will the instrumentation for detection of inadequate core cooling referred to in the Applicant's response to Item II.F.2 of NUREG-0737 be installed and operational prior to fuel loading at Diablo Canyon?
53. Discuss how the reliability of information from the Applicant's proposed instrumentation compares with the reliability of information from direct measurement of the reactor coolant level.
54. If the answer to interrogatory 52 is no, discuss how the reliability of information from the existing instrumentation at Diablo Canyon for detection of inadequate core cooling compares with the reliability of information from the direct measurement of the reactor coolant level.
55. Describe the training program to inform operators of new procedures associated with the proposed instrumentation referred to in the Applicant's response to Item II.F.2 of NUREG-0737.

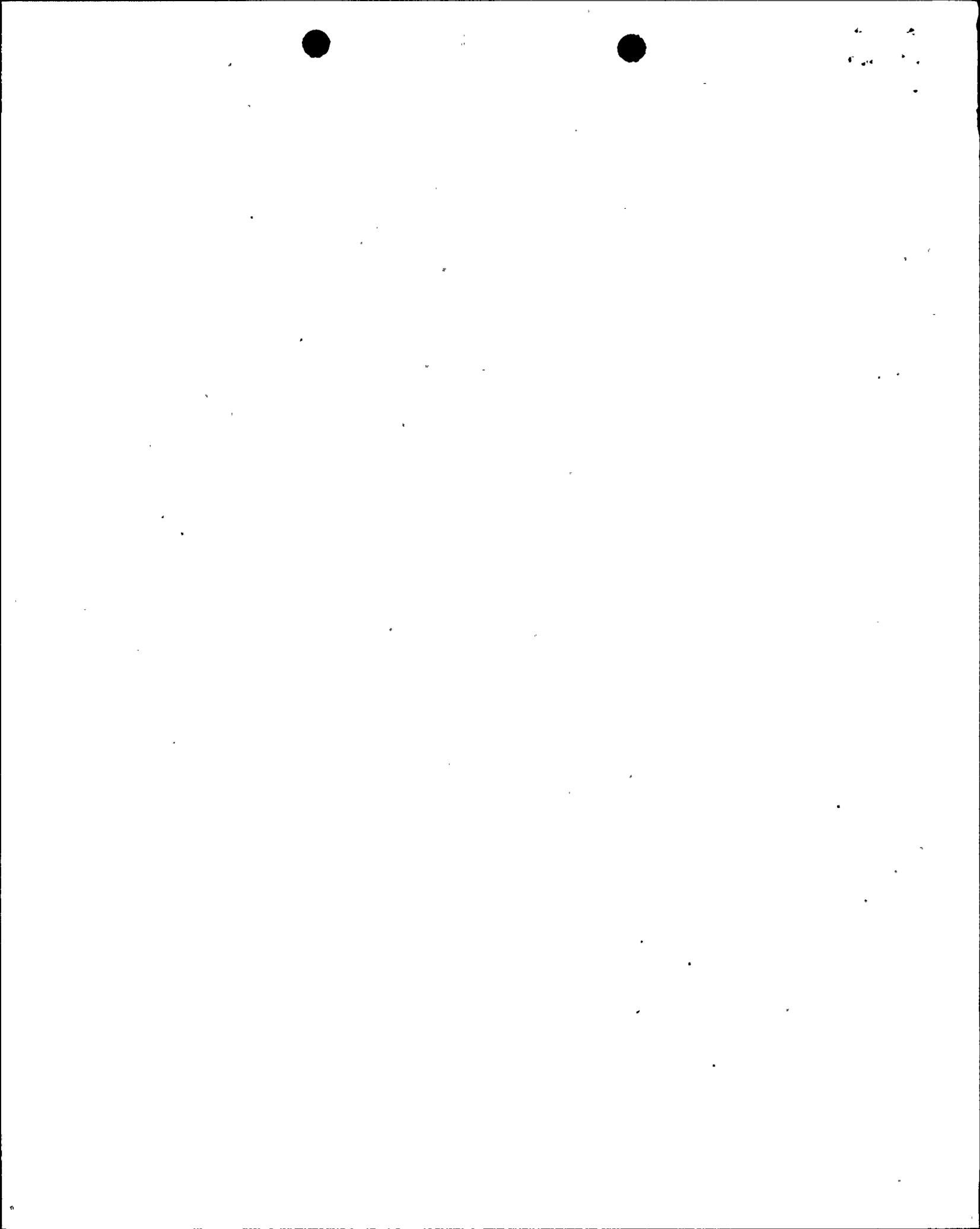
CONTENTION 24

- 56-60. Answer each of the five preliminary questions with respect to contention 24 and number the answers 56-60.
61. Describe in detail the methods by which the reactor coolant system relief and safety valves have been qualified to verify the capability of these valves to function during normal, transient and accident



conditions. This description should include specification of the environmental conditions assumed during normal, transient and accident situations and the means by which these environmental conditions were derived. Provide references to the Regulatory Guides applied in this analysis.

62. Did the Applicant fully apply the analysis of accidents and anticipated operational occurrences referenced in Regulatory Guide 1.70, Revision 2, to determine the expected valve operating conditions? If not, provide the justification for failing to do so.
63. Explain how the Applicant chose the single failures applied to these analyses so as to maximize the dynamic forces on the safety and relief valves.
64. Explain how the test pressures utilized in these analyses were determined to be the highest pressures predicted by conventional safety analysis procedures.
65. How did the Applicant determine the test conditions for qualification of the control circuitry, piping and supports associated with the reactor coolant system relief and safety valves?
66. Explain how the qualification testing of the reactor coolant system relief and safety valves and associated control circuitry, piping and supports complies with GDC 1, 14, 15 and 30.



Respectfully submitted,

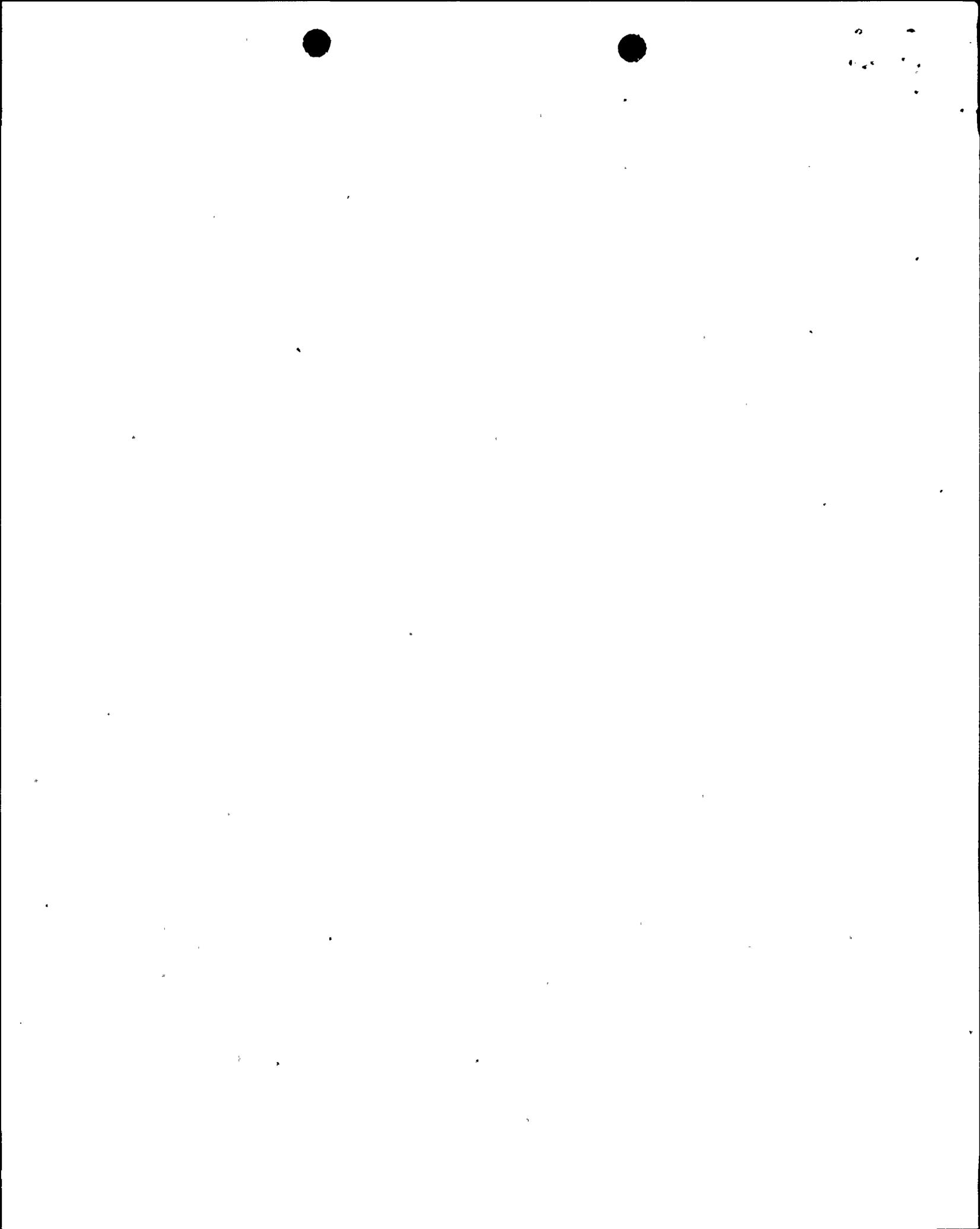
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CERTIFICATE OF SERVICE

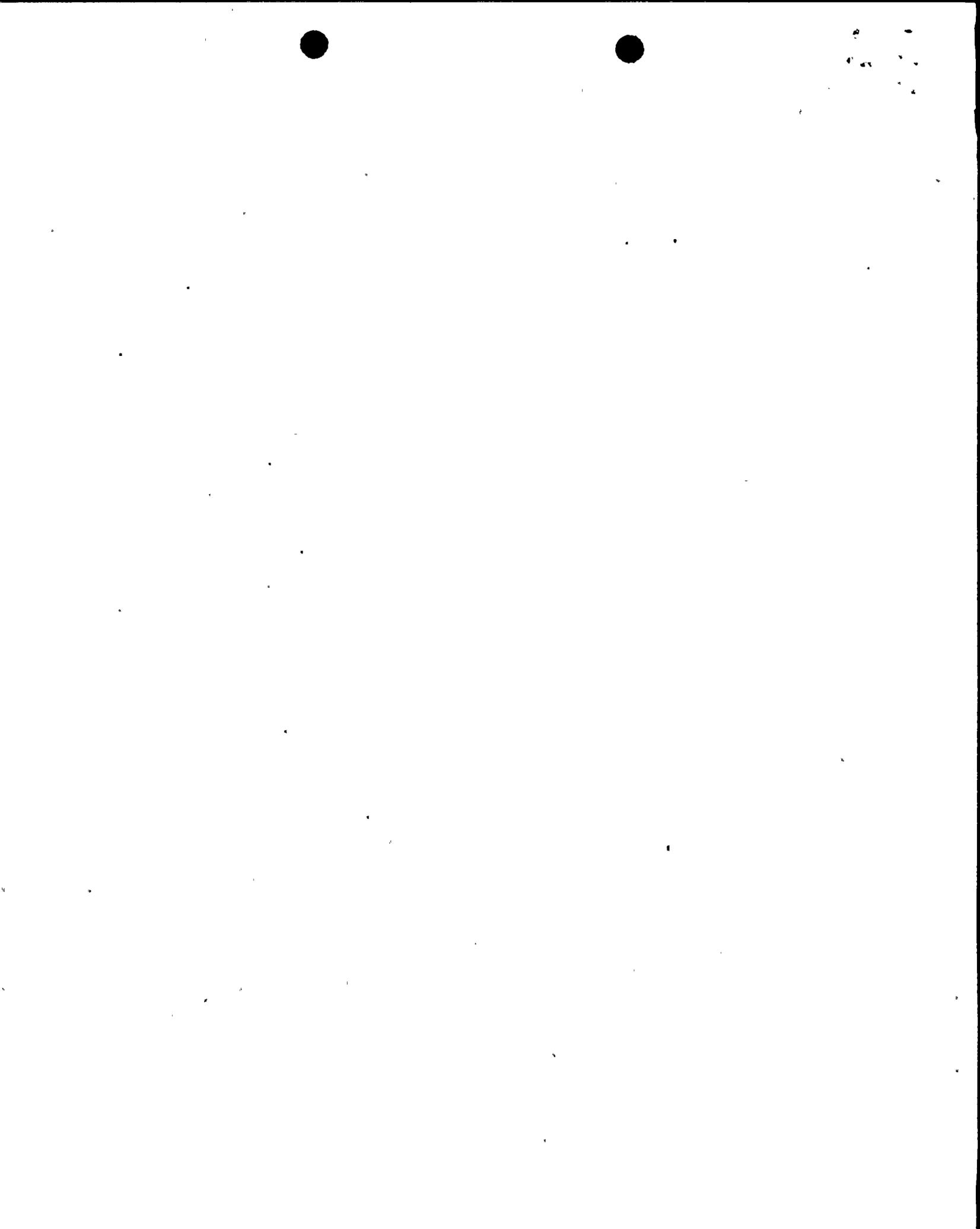
I hereby certify that on this 23rd day of February, 1981, I have served copies of the foregoing JOINT INTERVENORS' INTERROGATORIES TO PACIFIC GAS AND ELECTRIC COMPANY, mailing them through the U.S. mails, first class, postage prepaid.

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