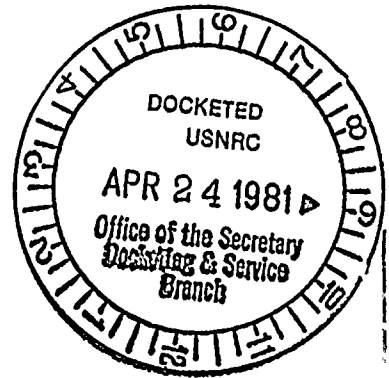


RELATED CORRESPONDENCE

4/20/81
4/20/81



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	Docket Nos. 50-275 O.L.
PACIFIC GAS AND ELECTRIC COMPANY)	50-323 O.L.
)	
(Diablo Canyon Nuclear Power)	(Low Power Test
Plant, Unit Nos. 1 and 2))	Proceeding)

PACIFIC GAS AND ELECTRIC COMPANY'S ANSWERS
TO INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS
DATED FEBRUARY 20, 1981 OF GOVERNOR EDMUND G. BROWN, JR.

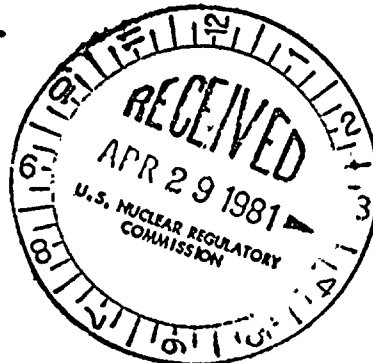
Answers to Interrogatories

Interrogatory 1: Do you contend that the combined PG&E, state and local emergency response plans for Diablo Canyon presently comply with the revised emergency planning regulations promulgated by the NRC on August 19, 1980, 45 Fed. Reg. 55402?

No.

Interrogatory 2: If the answer to Interrogatory 1 is affirmative, specify each and every fact which supports this position and identify all documents, including state, local and PG&E emergency response plans, which support this position or otherwise relate to compliance with the NRC's revised emergency planning regulations.

Not applicable.



DS03
50/1

G 8104300 345



Interrogatory 3: If the answer to Interrogatory 1 is negative, does PG&E contend that PG&E can be granted the requested fuel loading and low power licenses and undertake low power testing without compliance with the NRC's revised regulation? Explain the basis of any such position, including identification of all documents relating to this position.

Yes. The basis for PGandE's position in this matter was contained in our February 27, 1981, letter to Harold Denton which requested relief from items III.A.1.1 and III.A.2 of NUREG-0737. Technical discussions on the safety aspects of low power testing are contained in our February 6, 1981, letter to F. J. Maraglia, and in Supplements 10 and 12 to the Safety Evaluation Report prepared by the NRC Staff for Diablo Canyon.

Interrogatory 4: Does PG&E contend that the state, local and Applicant emergency response plans for Diablo Canyon satisfy the requirements set forth at page 2-11 of NUREG-0737, specified as clarification items III.A.1.1, III.A.1.2, and III.A.2?

PGandE does not contend that it meets the requirements of III.A.1.1 and III.A.2 of NUREG-0737. Item III.A.1.2 of NUREG-0737 does not establish requirements for fuel loading.

Interrogatory 5: If the answer to Interrogatory 4 is affirmative, specify each and every fact which supports this position and identify all documents which relate to compliance with these requirements.

Not applicable.

Interrogatory 6: What system does PG&E propose to install to measure water level in the Diablo Canyon reactor vessel? Describe the



system, including identification of all related documents, and explain when the system will be installed.

The system which PGandE proposes to install to measure the water level in the Diablo Canyon reactor vessel is described in our February 6, 1981 proprietary submittal to the NRC. This submittal was made in response to action item II.F.2 of NUREG-0737. A non-proprietary version has been served to the parties. This system will be completely installed and operable prior to fuel load.

Interrogatory 7: What is status of qualification tests and analyses of Diablo Canyon relief and safety valves? Describe the qualification program(s) which PG&E has undertaken or in which PG&E is participating, including identification of all documents relating to the program(s), and explain when the tests and analyses will be complete.

PGandE is a participant of the EPRI program to conduct qualification tests on relief and safety valves of the type to be used at Diablo Canyon Power Plant. The relief and safety valve qualification program and its status is described and documented in the EPRI documents listed below:

1. EPRI Report titled "Program Plan for the Performance Testing of PWR Safety and Relief Valves", Rev. 1, July 1, 1980.

As described in the Report, the purpose of this program is to evaluate the safety and design characteristics of pressurized water reactor safety and relief valves. This program is responsive to NUREG-0737, Item II.D.1, "Performance Testing for BWR and PWR Safety and Relief Valves", and is focused on the key issues associated with PWR Safety and Relief Valve system performance. The Report outlines a comprehensive experimental and analytical program which will evaluate valve operability and provide sufficient data to confirm methods for predicting safety and relief valve discharge piping loads. The experimental program described in this report includes full-scale tests of actual PWR relief and safety valves. Available data and experience from foreign relief valve test programs will be utilized to minimize potential delays in the experimental program.



Handwritten marks and characters in the top right corner, including what appears to be the number '2' and some illegible symbols.

2. EPRI Report titled "PWR Safety and Relief Valve Test Program: Description and Status", February, 1981.

This report provides a description and status of the overall program to date. This Report also discusses the program organization, the ongoing testing, the analytical effort, and the technical support activities.

A summary of the testing completed to date is as follows:

1. PORVs: Ten PORVs have been steam tested at Marshall Steam Station. The valves have been sent to Combustion Engineering at Windsor, Connecticut for further testing. This will be completed by 7/1/81. Data on steam testing has been sent to EPRI for the final report.

2. Safety Valves: No safety valves have been tested. Testing of 6 valves starts 4/1/81 and is to be completed by 7/1/81.

The testing program for PORVs and safety valves as required by the NRC will be complete 7/1/81. The manufacturers and models of the PORV and safety valves used at Diablo Canyon are represented in the EPRI testing program.

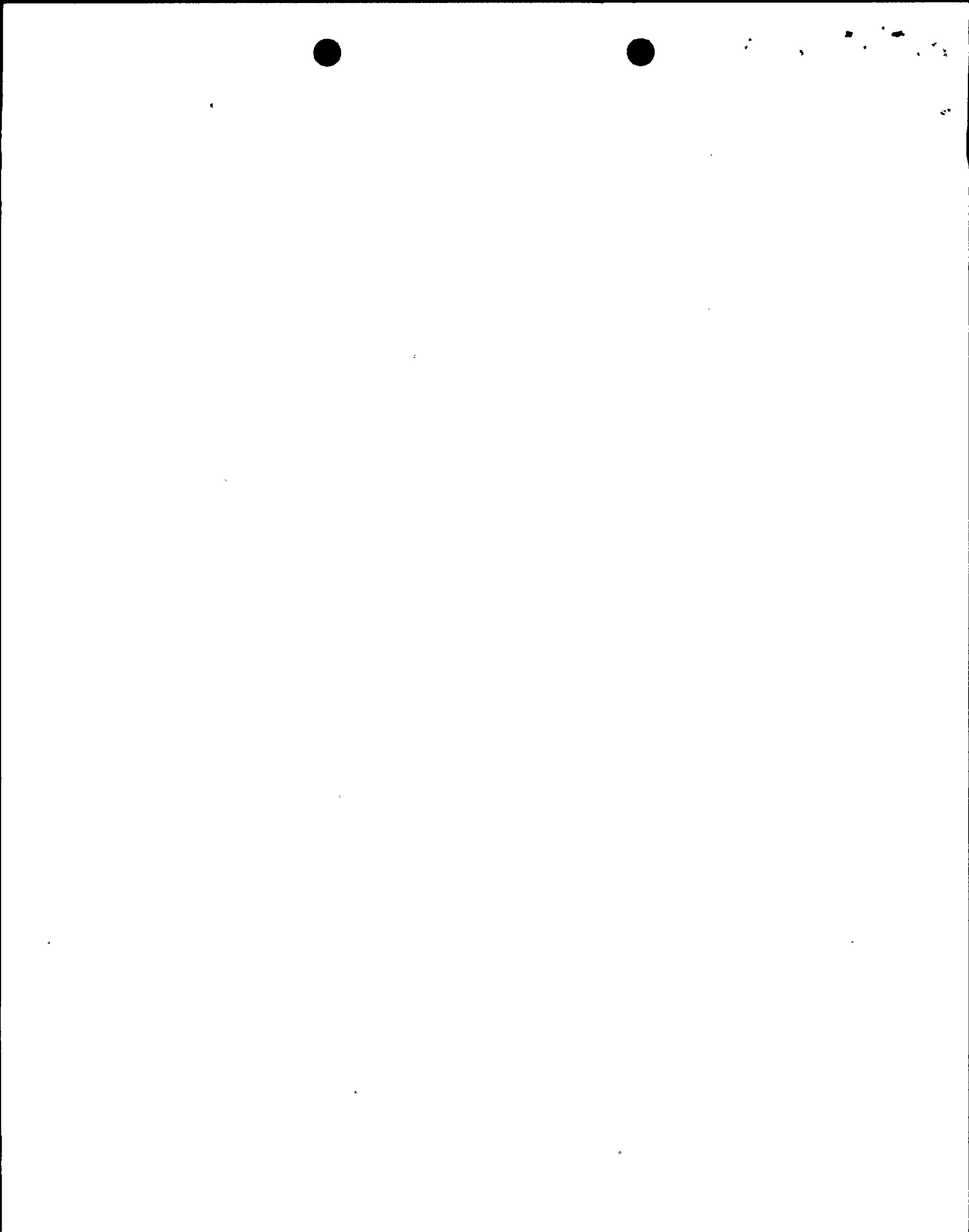
Response to Document Production Requests

Request 1: All documents identified in response to Interrogatories 1-7, above.

Applicant objects to the form of this Document Production Request. Among other things, 10 C.F.R. §2.741(c) provides that "[t]he request shall specify a reasonable time, place, and manner of making the inspection . . .". Governor Brown's "Request" is devoid of any such specification. Additionally, the respondent to a request has 30 days within which to respond after the service of the request pursuant to §2.741(d). Applicant will therefore respond to Governor Brown's request by no later than March 27, 1981.

Request 2: All other documents in PG&E's possession or control, or in the control of PG&E's employees, agents or contractors, which relate to emergency response planning for Diablo Canyon.

Same as response to Request number 1.



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

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

Docket No. 50-275

Docket No. 50-323

(Low Power Test Proceeding)

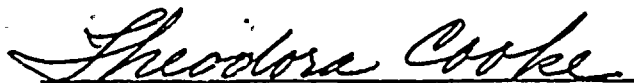
AFFIDAVIT RE ANSWERS TO GOVERNOR BROWN'S INTERROGATORIES

I am duly authorized and did prepare the answers to Governor Brown's Interrogatories 1 through 5, dated March 11, 1981. They are true and correct to the best of my knowledge and belief.

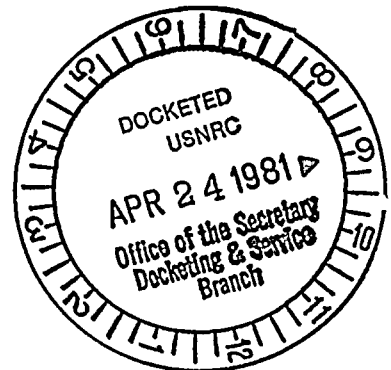


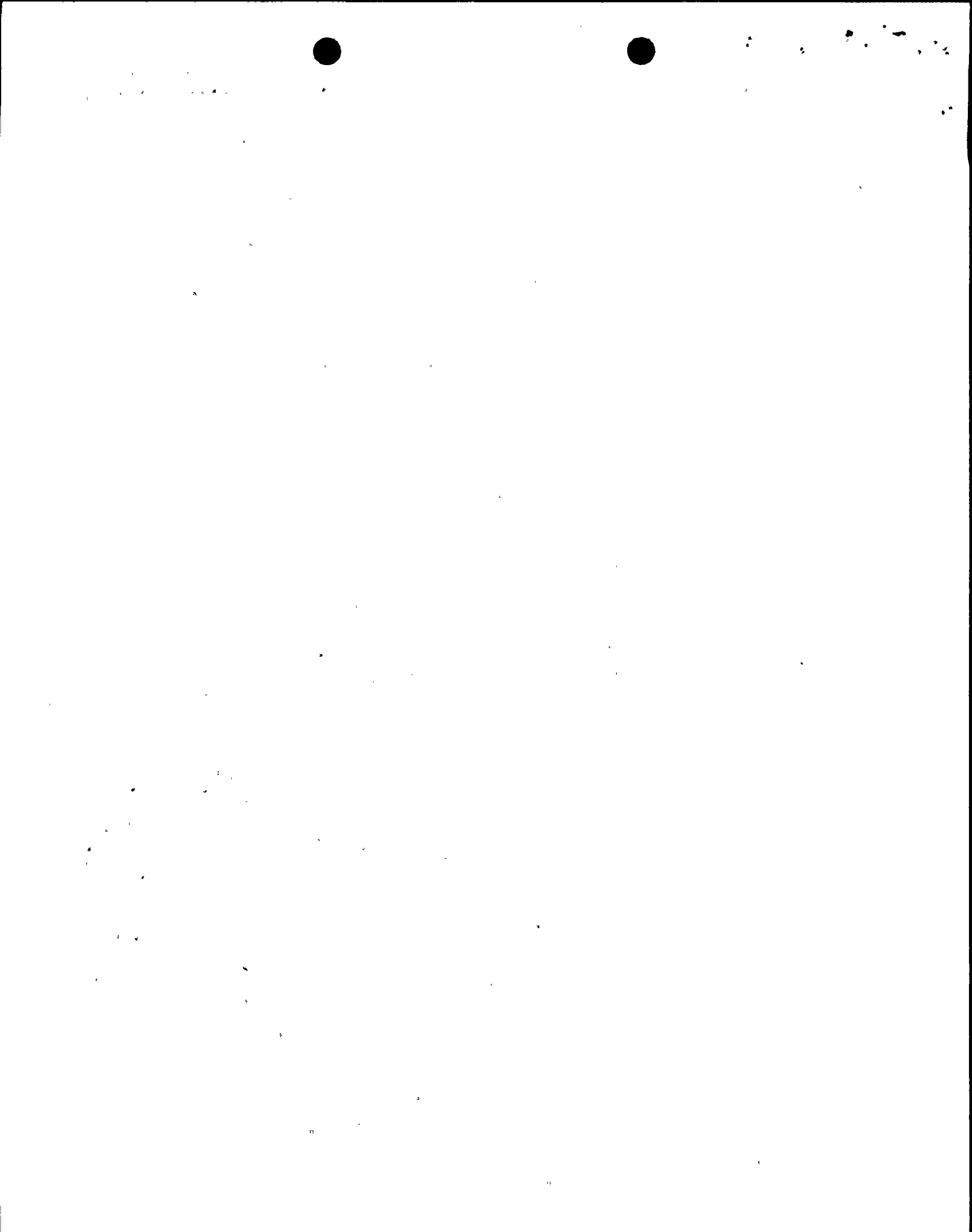
JAMES D. SHIFFER

Subscribed and sworn to before
me this 20th day of April, 1981

 (SEAL)
Theodora Cooke, Notary Public in
and for the City and County of
San Francisco, State of California

My Commission expires January 28, 1985





UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE


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

Docket No. 50-275
Docket No. 50-323

(Low Power Test Proceeding)

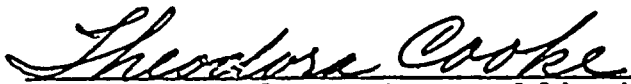
AFFIDAVIT RE ANSWERS TO GOVERNOR BROWN'S INTERROGATORIES

I am duly authorized and did prepare the answers to Governor Brown's Interrogatories 6 through 7, dated March 11, 1981. They are true and correct to the best of my knowledge and belief.

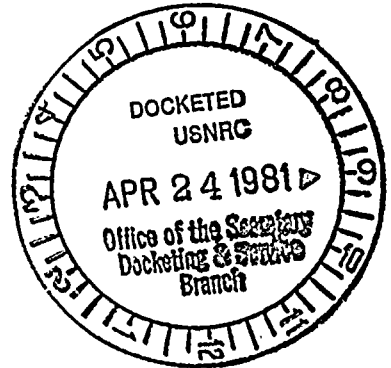


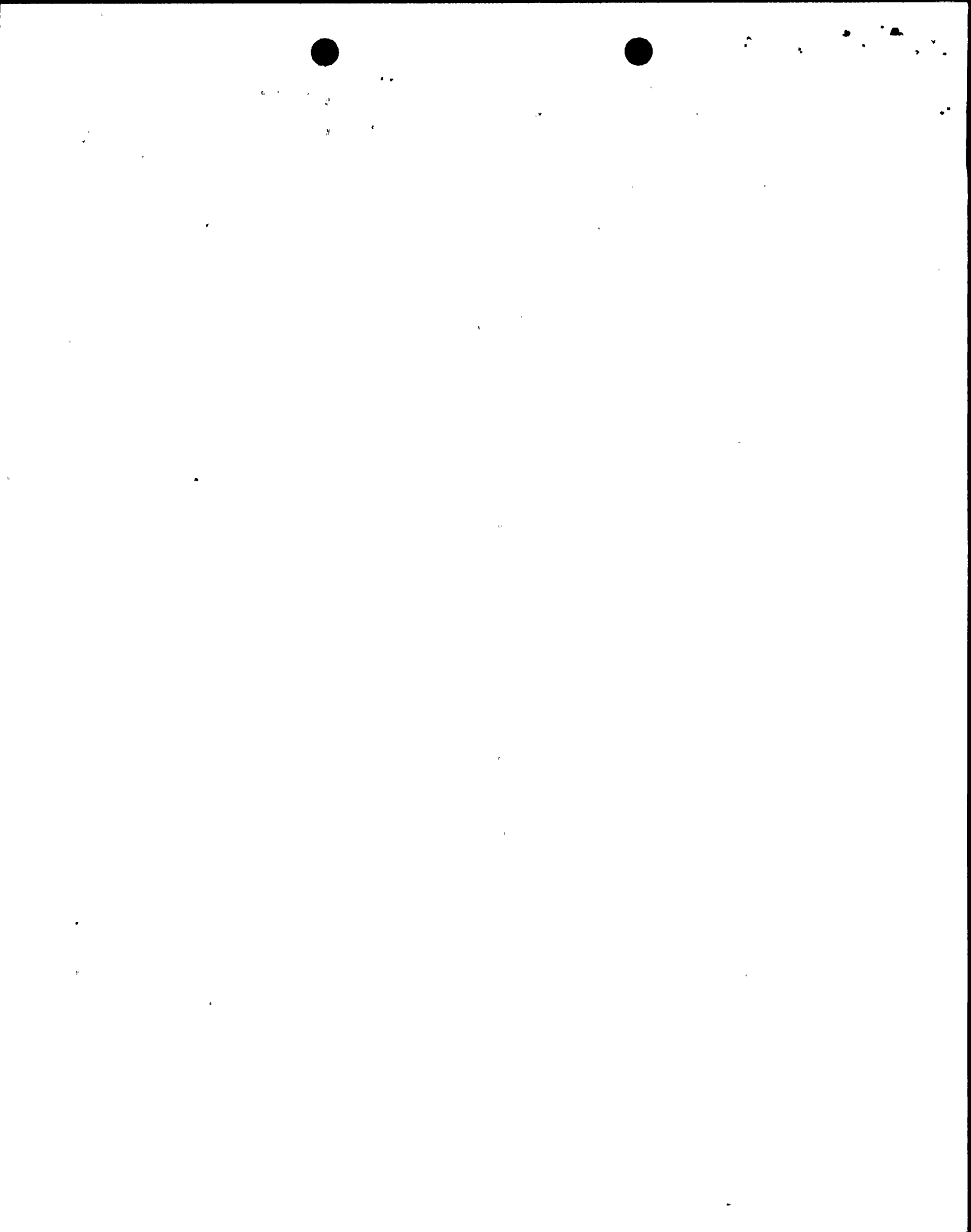
JOHN B. HOCH

Subscribed and sworn to before
me this 20th day of April, 1981

 (SEAL)
Theodora Cooke, Notary Public in
and for the City and County of
San Francisco, State of California

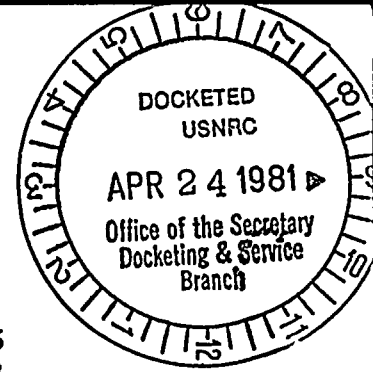
My Commission expires January 28, 1985





UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE



In the Matter of)
PACIFIC GAS AND ELECTRIC COMPANY)
Units 1 and 2)
Diablo Canyon Site)

Docket No. 50-275
Docket No. 50-323

CERTIFICATE OF SERVICE

The foregoing document (X) of Pacific Gas and Electric Company has (~~been~~) been served today on the following by deposit in the United States mail, properly stamped and addressed:

John F. Wolf, Esq.
Chairman
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mrs. Sandra A. Silver
1760 Alisal Street
San Luis Obispo, California 93401

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Gordon Silver
1760 Alisal Street
San Luis Obispo, California 93401

Dr. Jerry R. Kline
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

John Phillips, Esq.
Center for Law in the Public Interest
10203 Santa Monica Drive
Los Angeles, California 90067

Mrs. Elizabeth Apfelberg
C/o Nancy Culver
192 Luneta Drive
San Luis Obispo, California 93401

David F. Fleischaker, Esq.
1735 Eye Street, N.W.
Suite 709
Washington, D. C. 20006

Janice E. Kerr, Esq.
Public Utilities Commission
of the State of California
5246 State Building
350 McAllister Street
San Francisco, California 94102

Arthur C. Gehr, Esq.
Snell & Wilmer
3100 Valley Bank Center
Phoenix, Arizona 85073

Mrs. Raye Fleming
1920 Mattie Road
Shell Beach, California 93449

Bruce Norton, Esq.
Norton, Burke, Berry & Junck
3216 North Third Street
Suite 300
Phoenix, Arizona 85012

Mr. Frederick Eissler
Scenic Shoreline Preservation
Conference, Inc.
4623 More Mesa Drive
Santa Barbara, California 93105

Chairman
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Small, illegible marks and artifacts at the top right of the page.

Chairman
Atomic Safety and Licensing
Appeal Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn.: Docketing and Service Section

William J. Olmstead, Esq.
Charles Barth, Esq.
Edward G. Ketchen, Esq.
Lucinda Low Swartz, Esq.
Office of Executive Legal Director
BETH 042
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Richard B. Hubbard
MHB Technical Associates
1723 Hamilton Avenue, Suite K
San Jose, California 95125

Mr. Carl Neiberger
Telegram Tribune
P. O. Box 112
San Luis Obispo, California 93402

Herbert H. Brown, Esq.
Lawrence Coe Lanpher, Esq.
Christopher B. Hanback, Esq.
Hill, Christopher & Phillips
1900 M Street, N.W.
Washington, D. C. 20036

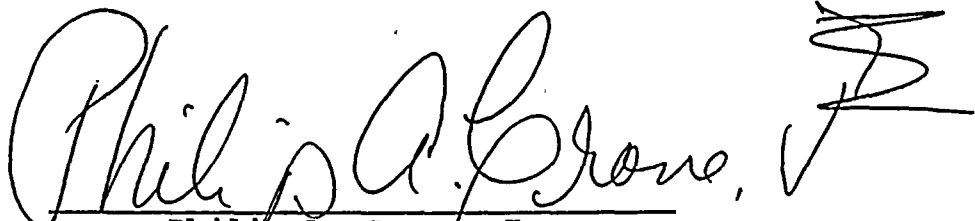
Byron S. Georgiou, Esq.
Deputy Legal Affairs Secretary
Governor's Office
State Capitol
Sacramento, California 95814

Majorie S. Nordlinger, Attorney
Office of the General Counsel
U. S. Nuclear Regulatory Commission
1717 H Street, N.W.
Mail Stop H-1035
Washington, D. C. 20555

Richard S. Salzman, Esq.
Chairman
Atomic Safety and Licensing
Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. W. Reed Johnson
Atomic Safety and Licensing
Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. John H. Buck
Atomic Safety and Licensing
Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555


Philip A. Crane, Jr.
Attorney
Pacific Gas and Electric Company

Date: April 21, 1981

