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 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323
 AUTH.NAME AUTHOR AFFILIATION
 BRAND,D.A. Pacific Gas & Electric Co.
 RECIP.NAME RECIPIENT AFFILIATION
 DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards responses to Govt Accountability Project 840202
 10CFR2.206 petition.

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NOTES: J Hanchett 1cy PDR Documents. 05000275
 J Hanchett 1cy PDR Documents. 05000323

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	NRR/DSI/RSB 25		1	1		REG FILE 04	1	1	
	RGNS		3	3		RM/DDAMI/MIB	1	0	
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PACIFIC GAS AND ELECTRIC COMPANY

PG&E + 77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

D. A. BRAND
VICE PRESIDENT
ENGINEERING

March 29, 1984

PGandE Letter No.: DCL-84-123

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-76
Docket No. 50-323
Diablo Canyon Units 1 and 2
10 CFR 2.206 Petition by GAP Dated February 2, 1984

Dear Mr. Denton:

Enclosed are the responses of Pacific Gas and Electric Company to the allegations raised by GAP in its 10 CFR 2.206 Petition to the Commission dated February 2, 1984. Because the GAP Petition and the two motions to reopen filed by the Joint Intervenors in Docket Nos. 50-275 and 50-323 are the same or similar for most of the allegations and the supporting affidavits are identical, PGandE is submitting two tables which reference the Company's responses to the allegations in the two motions to reopen. In addition, included is another affidavit in response to certain allegations by GAP in order to amplify prior responses to the motions to reopen.

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G PDR

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Mr. H. R. Denton
March 29, 1984
Page Two

Kindly acknowledge receipt of this material on the enclosed copy of this letter and retain it in the enclosed addressed envelope.

Subscribed to in San Francisco, California this 29th day of March, 1984.

Respectfully submitted,


Pacific Gas and Electric Company

By 
D. A. Brand
Vice President
Engineering

Robert Ohlbach
Philip A. Crane, Jr.
Richard F. Locke
Dan G. Lubbock
Attorneys for Pacific
Gas and Electric Company

By 
Dan G. Lubbock

Subscribed and sworn to before me
this 29th day of March, 1984.

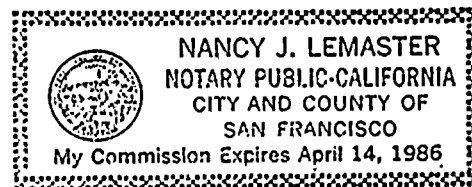

Nancy J. Lemaster, Notary Public in
and for the City and County of
San Francisco, State of California



My commission expires April 14, 1986.

Enclosures

cc: Service List



ENCLOSURE 1

TABLE 1 REFERENCES

ITEMS 1-141

Affidavit; Neary, et al	C. M. Neary, F. J. Lyautey, J. P. Watson
Affidavit; Karner, et al	H. W. Karner, R. D. Etzler
Affidavit; Geske(1)	D. R. Geske
Affidavit; Geske(2)	D. Geske, J. Guyler, A. Eck, M. MacCrae, H. Karner
Affidavit; Breismeister, et al	F. C. Breismeister, C. M. Neary, H. W. Karner, R. D. Kerr
Affidavit; Arnold(1), et al	J. Arnold, D. R. Cody, R. G. Fink, H. W. Karner, R. A. Torstrom
Affidavit; Arnold(2), et al	H. R. Arnold, F. C. Breismeister, R. K. Rhodes
Affidavit; Rockwell, et al	D. A. Rockwell, L. R. Wilson
Affidavit; Tresler, et al	M. R. Tresler, L. R. Wilson, H. W. Karner, J. K. McCall

TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 1	Pullman Welder Qualification	Affidavit; Neary, et al, p. 2
Item 2	Management Commitment to Welder Qualification	Affidavit; Neary, et al, p. 3
Item 3	Refusal to Process a Formal QC Report	Affidavit; Karner, et al, p. 27
Item 4	Refusal of Access to Records	Affidavit; Karner, et al, p. 28
Item 5	QC Inspector Termination	Affidavit; Karner, et al, p. 29
Item 6	Informed NRC that Inspector Quit, but was fired	Affidavit; Karner, et al, p. 31
Item 7	Inadequate Welder Qualification	Affidavit; Geske(1), p. 1
Item 8	PGandE Changed Contact Specifications	Affidavit; Breismeister, et al, p. 7
Item 9	Indeterminate Welder Qualification	Affidavit; Breismeister, et al, p. 8
Item 10	Improper Weld of Tube Steel	Affidavit; Breismeister, et al, p. 9
Item 11	Code 7/8 Improperly Used	Affidavit; Breismeister, et al, p. 11
Item 12	Inspector Reassigned	Affidavit; Breismeister, et al, p. 11
Item 13	Code 7/8 Requirements Violated	Affidavit; Breismeister, et al, p. 11

TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 14	Overextension of Code 7/8	Affidavit; Breismeister, et al, p. 12
Item 15	A-307 Bolts Uncontrolled	Affidavit; Breismeister, et al, p. 12
Item 16	Code 7/8 Improperly Used	Affidavit; Breismeister, et al, p. 13
Item 17	Code 7/8 Improperly Used	Affidavit; Breismeister, et al, p. 14
Item 18	Code 7/8 Improperly Used	Affidavit; Breismeister, et al, p. 15
Item 19	Code 7/8 Improperly Used	Affidavit; Breismeister, et al, p. 16
Item 20	No Procedure for Restraint Welding	Affidavit; Breismeister, et al, p. 17
Item 21	Inferior AWS Substitute	Affidavit; Breismeister, et al, p. 17
Item 22	Management Disregarded Violations	Affidavit; Karner, et al, p. 25
Item 23	No Response to QA Inspector	Affidavit; Breismeister, et al, p. 18
Item 24	Unqualified Weld Technique	Affidavit; Karner, et al, p. 26
Item 25	AWS 1-1 Procedure Inadequate	Affidavit; Breismeister, et al, p. 19
Item 26	Unacceptable Steel Used	Affidavit; Breismeister, et al, p. 20
Item 27	Use of Inferior Steel Approved	Affidavit; Karner, et al, p. 12

TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 28	Charpy/Notch Impact Tests Waived	Affidavit; Breismeister, et al, p. 20
Item 29	Rupture Restraint Welds Poor	Affidavit; Arnold(1), et al, p. 17
Item 30	Generic Exemption from AWS	Affidavit; Breismeister, et al, p. 22
Item 31	Code 88/89 Procedure Inadequate	Affidavit; Breismeister, et al, p. 23
Item 32	Code 88/89 Procedure Inadequate	Affidavit; Breismeister, et al, p. 23
Item 33	Improper Substitution for Code 88/89	Affidavit; Breismeister, et al, p. 24
Item 34	Improper Substitution of Code 92/93	Affidavit; Geske (1), p. 1
Item 35	Improper Procedure Qualifica- tion	Affidavit; Geske (1), p. 1
Item 36	Improper Procedure Qualifica- tion	Affidavit; Breismeister, et al, p. 25
Item 37	Welding Machine Calibration	Affidavit; Breismeister, et al, p. 26
Item 38	Use of GTAW Welding Machines	Affidavit; Breismeister, et al, p. 26
Item 39	Weld Contamination	Affidavit; Breismeister, et al, p. 26
Item 40	Management Refusal to Honor Contract Specifications	Affidavit; Breismeister, et al, p. 28

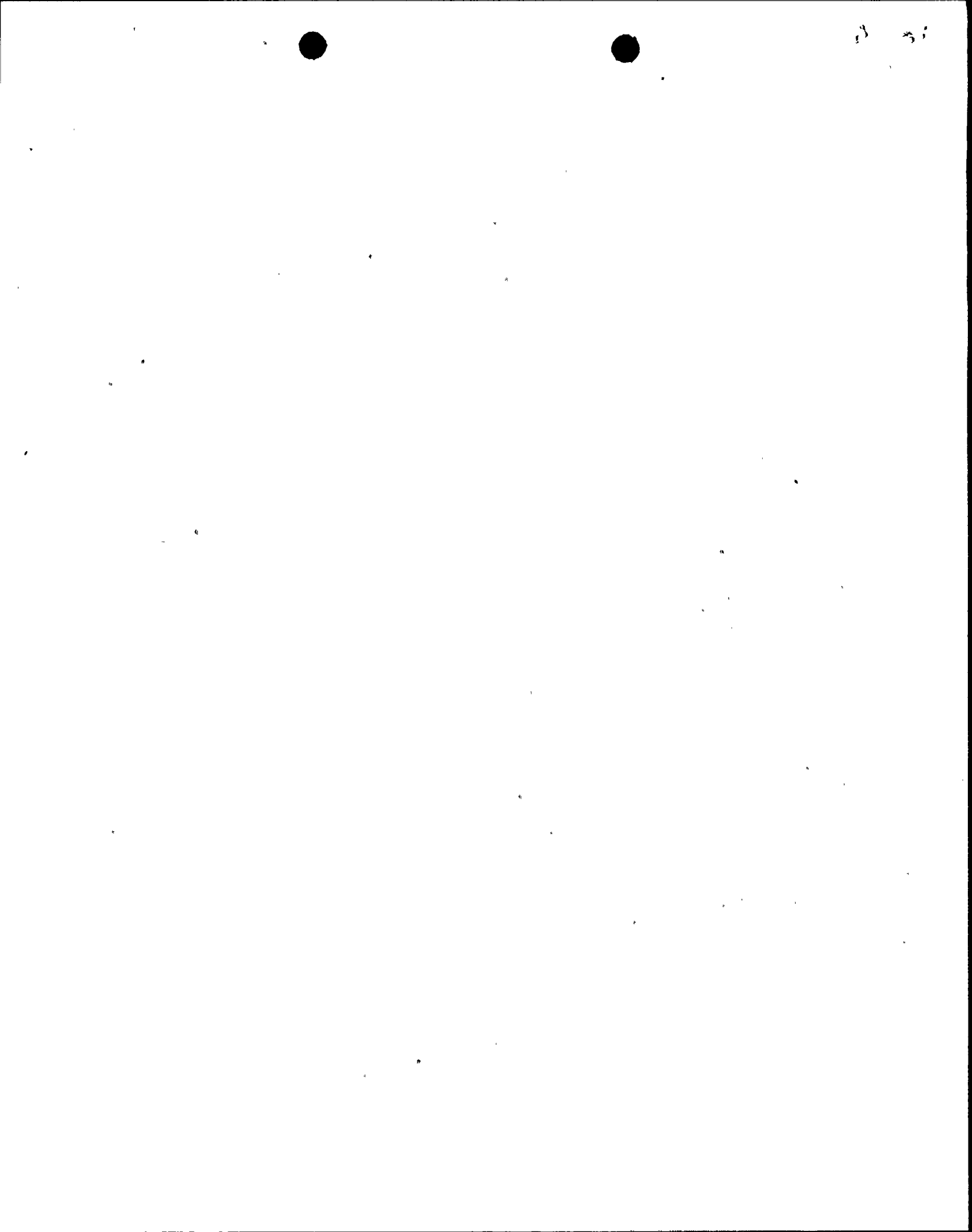


TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 41	Intentional Violations	Affidavit; Breismeister, et al, p. 29
Item 42	Electrode Storage Deficient.	Affidavit; Breismeister, et al, p. 30
Item 43	Storage Corrective Action Ineffective	Affidavit; Breismeister, et al, p. 32
Item 44	Cheating on Qualification Test	Affidavit; Geske(2), et al, p. 2
Item 45	Inspectors Hindered	Affidavit; Breismeister, et al, p. 33 Affidavit; Karner, et al, p. 18
Item 46	Refusal to Supply Weld Procedure	Affidavit; Breismeister, et al, p. 33
Item 47	Intimidation to Accept Welds	Affidavit; Karner, et al, p. 22
Item 48	Inspections for Weld Fitup	Affidavit; Breismeister, et al, p. 34
Item 49	Flare Welds Exempted From Inspection	Affidavit; Breismeister, et al, p. 34
Item 50	Full Penetration Welds Not UT	Affidavit; Arnold(1), et al, p. 14
Item 51	Inadequate Review	Affidavit; Arnold(1), et al, p. 14
Item 52	Weld Procedures Uncontrolled	Affidavit; Geske(2), et al, p. 4
Item 53	Unapproved Weld Procedure Changes	Affidavit; Breismeister, et al, p. 36
Item 54	Wrong Welding Process	Affidavit; Breismeister, et al, p. 36

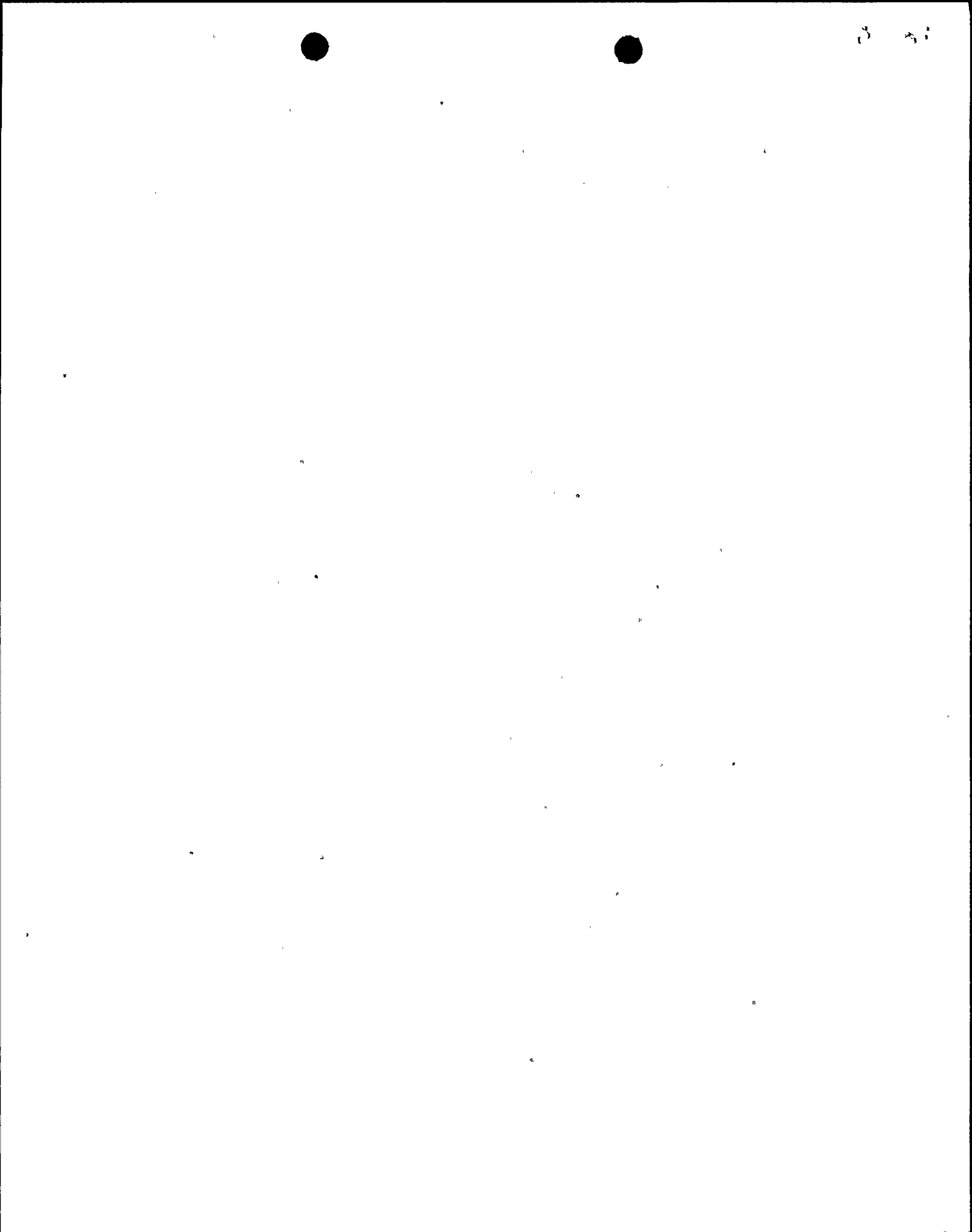


TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 55	Wrong Welds Performed	Affidavit; Breismeister, et al, p. 36
Item 56	Uncontrolled Weld Repairs	Affidavit; Breismeister, et al, p. 38
Item 57	Drawings Not Revised	Affidavit; Breismeister, et al, p. 38
Item 58	Manipulation of NDE Tests	Affidavit; Arnold(1), et al, p. 17
Item 59	Valve UT Procedure Unqualified	Affidavit; Arnold(1), et al, p. 3
Item 60	No Procedure Verification Tests	Affidavit; Arnold(1), et al, p. 4
Item 61	UT Measurements Qualification Test	Affidavit; Arnold(1), et al, p. 5
Item 62	Lack of Management Action on UT Testing	Affidavit; Arnold(1), et al, p. 6
Item 63	NDE Excluded from 10 CFR 50 Scope	Affidavit; Arnold(1), et al; p. 7
Item 64	Data Reports Incomplete	Affidavit; Arnold(1), et al, p. 19
Item 65	Data Reports Unreliable	Affidavit; Arnold(1), et al, p. 20
Item 66	Equipment Calibration Records	Affidavit; Arnold(1), et al, p. 21
Item 67	Equipment Failed Minimum Reliability	Affidavit; Arnold(1), et al, p. 22



TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 68	Failed Valves May be Uncorrected	Affidavit; Arnold(1), et al, p. 23
Item 69	Valve Measurements Incomplete	Affidavit; Arnold(1), et al, p. 24
Item 70	Undocumented Evidence of Valve Examination	Affidavit; Arnold(1), et al, p. 25
Item 71	Undocumented Valve Weld repairs	Affidavit; Arnold(1), et al, p. 26
Item 72	Valves Do Not Meet AEC and PGandE Requirements	Affidavit; Arnold(1), et al, p. 27
Item 73	Lack of Corrective Action	Affidavit; Arnold(1), et al, p. 28
Item 74	QA Breakdown for UT Measurements	Affidavit; Arnold(1), et al, p. 7
Item 75	After-the-Fact Procedure Qualification	Affidavit; Arnold(1), et al, p. 12
Item 76	Management Review of Procedures	Affidavit; Arnold(1), et al, p. 12
Item 77	Management Prevented Corrective Action	Affidavit; Arnold(1), et al, p. 13
Item 78	No Investigation Where ESD 270 Was Used	Affidavit; Arnold(1), et al, p. 14
Item 79	ESD 241 Qualification Records	Affidavit; Arnold(1), et al, p. 31
Item 80	ESD 241 Used Prior to UT Procedure Issued	Affidavit; Arnold(1), et al, p. 29

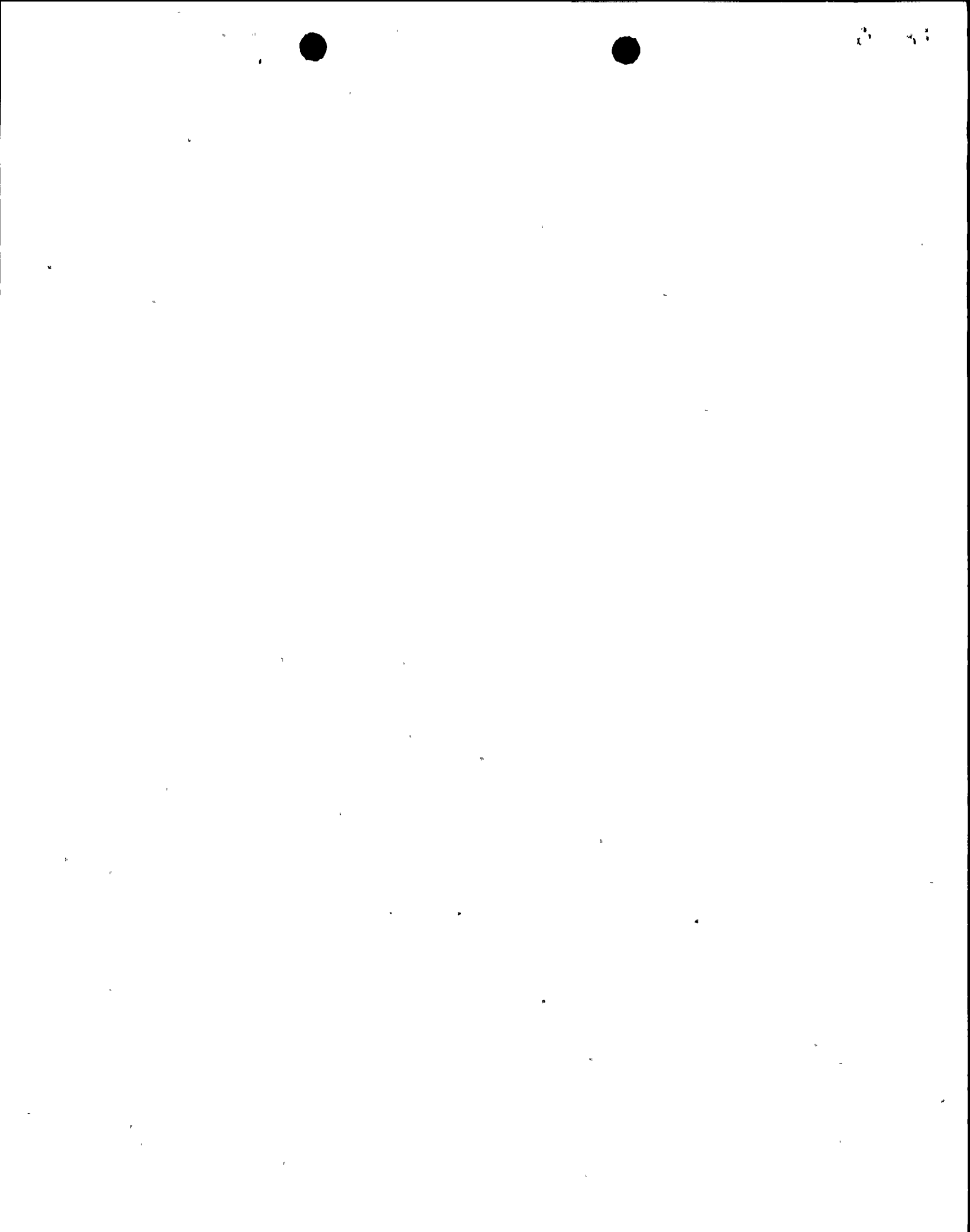


TABLE 1 - CONSTRUCTION QA

GAP PETITION February 2, 1984		PGandE's ANSWER IN OPPOSITION TO MOTION TO REOPEN CQA March 19, 1984
Item 81	ESD 241 Violated Dresser Instructions	Affidavit; Arnold(1), et al, p. 29
Item 82	Test Documentation Doesn't Comply	Affidavit; Arnold(1), et al, p. 32
Item 83	Yoke Rod End Backup Inspection	Affidavit; Arnold(1), et al, p. 34
Item 84	Improper Management Action	Affidavit; Arnold(1), et al, p. 35
Item 85	Pullman Violated NRC Reporting Requirements	Affidavit; Arnold(1), et al, p. 10
Item 86	Management Restricted Inspector	Affidavit; Karner, et al, p. 8
Item 87	(Number Omitted from Petition)	NA
Item 88	(Number Omitted from Petition)	NA
Item 89	After-the-Fact Procedure Qualification	Affidavit; Arnold(1), et al, p. 10
Item 90	Untimely Corrective Action	Affidavit; Geske(2), et al, p. 6
Item 91	QA Failed to Respond	Affidavit; Geske(2), et al, p. 6
Item 92	Intimidation of Inspector	Affidavit; Karner, et al, p. 5
Item 93	Pullman Not Committed to 10CFR50, App. B	Affidavit; Geske(2), et al, p. 8
Item 94	Hydro Procedures Inadequate	Affidavit; Geske(2), et al, p. 10

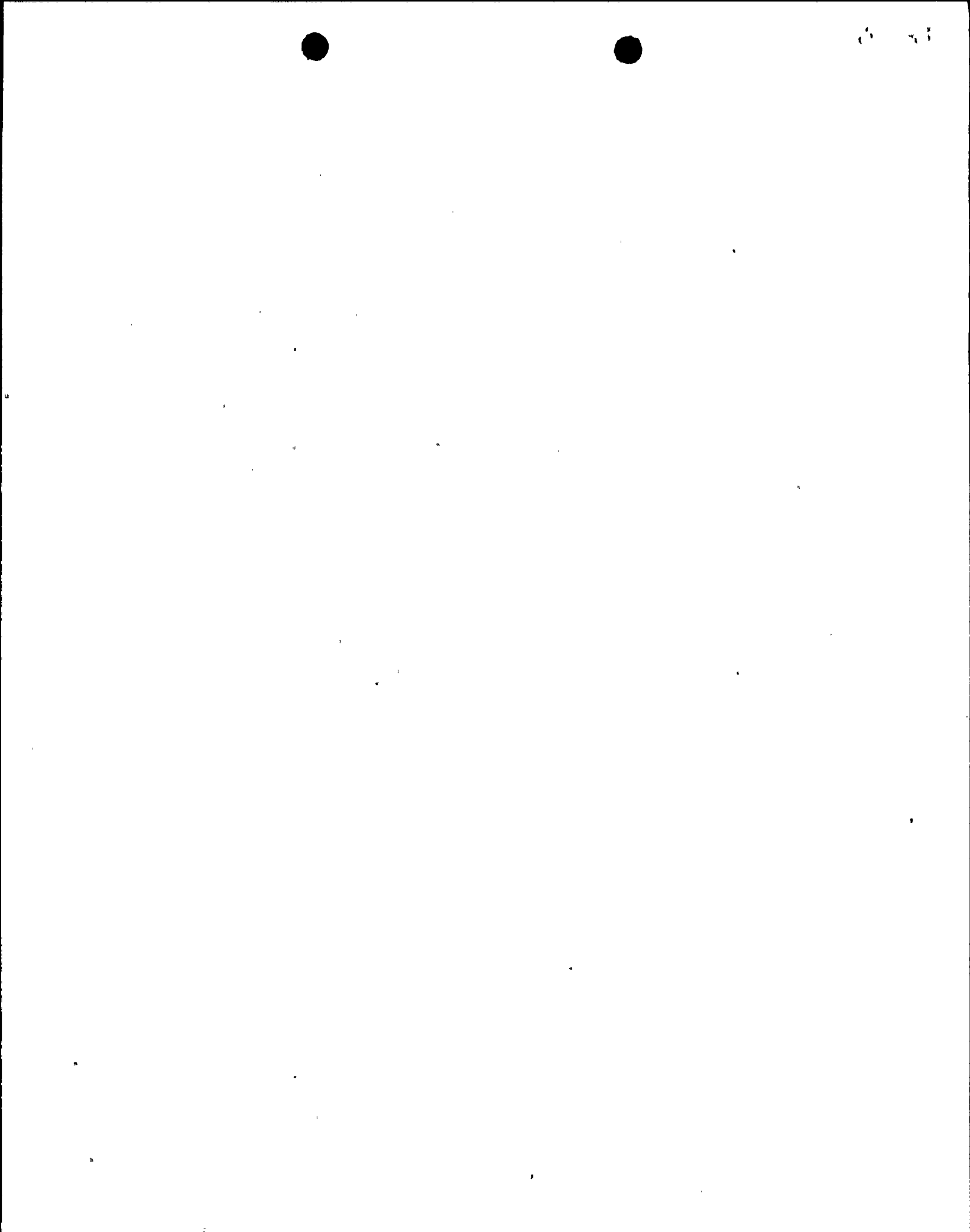


TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 95	Hydro Tests Missing QA Documentation	Affidavit; Geske(2), et al, p. 11
Item 96	Test Requirements Lack Basic Information	Affidavit; Geske(2), et al, p. 12
Item 97	Hydro Data Inconsistent With Requirements	Affidavit; Geske(2), et al, p. 13
Item 98	Post-1978 Hydro Retests Lacked QC Release	Affidavit; Geske(2), et al, p. 11
Item 99	Management Harassment of QA Personnel	Affidavit; Karner, et al, p. 2
Item 100	Reliability of Pullman's Vendor List	Affidavit; Geske(2), et al, p. 14
Item 101	Microsurface Tools Measurements Indeterminate	Affidavit; Geske(2), et al, p. 14
Item 102	PGandE Stifled Correction of Faulty Welds	Affidavit; Brejsmeister, et al, p. 39
Item 103	Hardware Defective	Affidavit; Breismeister, et al, p. 39
Item 104	Deletion of Welds From Walkdown	Affidavit; Breismeister, et al, p. 39
Item 105	Foley Purchased Wrong Parts	Affidavit; Rockwell, et al, p. 2
Item 106	Improper Beam Clamps	Affidavit; Rockwell, et al, p. 2

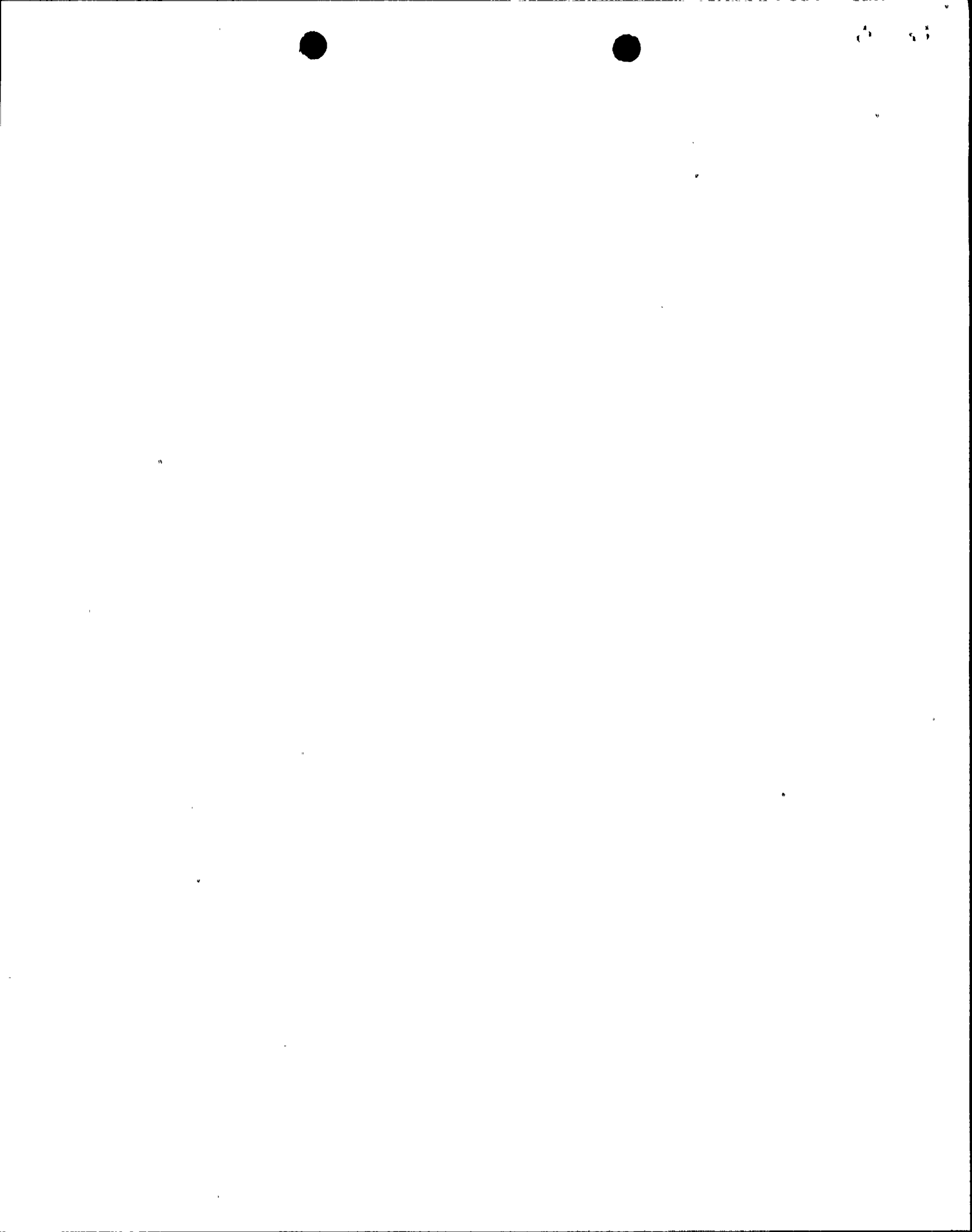


TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 107	Thermocouple Installation Without QA Procedures	Affidavit; Rockwell, et al, p. 5
Item 108	Thermocouples Misclassified	Affidavit; Rockwell, et al, p. 6
Item 109	Intimidation of Foley Personnel	Affidavit; Rockwell, et al, p. 6
Item 110	Pipe Support Baseplate Shims	Affidavit; Tresler, et al, p. 2
Item 111	Uncontrolled Installation of Shims	Affidavit; Tresler, et al, p. 2
Item 112	Manipulation of Procedure Qualification Tests	Affidavit; Arnold(2), et al, p. 2
Item 113	Improper Control of Procedures	Affidavit; Arnold(2), et al, p. 6
Item 114	Tubing Procedure Concerns	Affidavit; Arnold(2), et al, p. 7
Item 115	QC Inspector Training Inadequate	Affidavit; Geske(2), et al, p. 16
Item 116	Compliance Records Misleading	Affidavit; Geske(2), et al, p. 16
Item 117	Unapproved Changes by QA	Affidavit; Geske(2), et al, p. 20
Item 118	No Rejection Criteria	Affidavit; Geske(2), et al, p. 21
Item 119	Lack of Information on Changes in Acceptance Criteria	Affidavit; Geske(2), et al, p. 22



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TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 120	Delay Tactics for NCRs	Affidavit; Karner, et al, p. 36
Item 121	Lack of Training in Reporting of QC/QA Violations	Affidavit; Geske(2), et al, p. 24
Item 122	Lack of Access to NCR System	Affidavit; Karner, et al, p. 43
Item 123	Need Prior Approval to Write NPPRs	Affidavit; Karner, et al, p. 44
Item 124	NPPRs Voided Without Explanation	Affidavit; Karner, et al, p. 45
Item 125	Prior Approval to Write Problem Reports	Affidavit; Karner, et al, p. 44
Item 126	Inspectors Denied Access to Documents	Affidavit; Karner, et al, p. 18
Item 127	Inspector Instructed Not to Identify Problems	Affidavit; Karner, et al, p. 5
Item 128	Inspector Terminated	Affidavit; Karner, et al, p. 19
Item 129	Inspector Intimidated	Affidavit; Karner, et al, p. 46
Item 130	Threat of Termination	Affidavit; Karner, et al, p. 7
Item 131	Threat of Termination	Affidavit; Karner, et al, p. 19
Item 132	Retaliation Towards Inspectors	Affidavit; Karner, et al, p. 19



TABLE 1 - CONSTRUCTION QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN CQA
March 19, 1984

Item 133	Pipefitter Terminated	Affidavit; Karner, et al, p. 10
Item 134	QC Inspector Terminated	Affidavit; Karner, et al, p. 31
Item 135	Denial of Raises to Inspectors	Affidavit; Karner, et al, p. 33
Item 136	Management Repression of Violations	Affidavit; Karner, et al, p. 34
Item 137	Retaliation Towards Construction Personnel	Affidavit; Karner, et al, p. 40
Item 138	Scheduling Priority Over Quality	Affidavit; Karner, et al, p. 39
Item 139	Pullman Inadequate Resources	Affidavit; Karner, et al, p. 13
Item 140	Pullman Anti-QA Philosophy	Affidavit; Karner, et al, p. 14
Item 141	PGandE Didn't Correct Violations	Affidavit; Karner, et al, p. 16



TABLE 2 REFERENCES

ITEMS 142 - 170

Affidavit; Breismeister, et al

F. C. Breismeister, D. J. Curtis,
M. J. Jacobson, M. E. Leppke,
G. H. Moore, R. G. Oman,
L. E. Shipley, W. H. white

Affidavit; Tresler, et al

M. Tresler, R. Oman, M. Leppke

Affidavit; Mangoba

Leonardo B. Mangoba

Affidavit; Shiffer, et al

J. D. Shiffer, R. Patterson,
J. M. Gisclon, K. C. Doss, J. B. Hoch,
R. C. Thornberry, R. D. Etzler,
R. K. Rhodes, E. M. Burns

Affidavit; Anderson, et al

R. C. Anderson, M. J. Jacobson,
M. E. Leppke, L. E. Shipley



TABLE 2 - DESIGN QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN DQA
March 6, 1984

Item 142 Minimal Training for Review Engineers	Affidavit; Breismeister, et al, Item I, p. 2 Affidavit; Tresler, et al, par. 19, p. 9 Affidavit; Anderson, et al, Exhibit 1, p. 34
Item 143 Failure to Issue Controlled Documents	Affidavit; Breismeister, et al, Item II, p. 5 and Item III, p. 6 Affidavit; Anderson, et al, Exhibit 1, p. 40
Item 144 Request for Documents Ignored	Affidavit; Breismeister, et al, Item II, p. 5 Affidavit; Anderson, et al, Exhibit 1, p. 41
Item 145 Engineers Transferred and Replaced	Affidavit; Breismeister, et al, Item VI, p. 15 Affidavit; Tresler, et al, par. 11, 13, pp. 6, 7
Item 146 Calculations Destroyed	Affidavit; Breismeister, et al, Item VII, p. 16 Affidavit; Anderson, et al, Exhibit 1, p. 31
Item 147 Calculations are Bechtel Property	Affidavit; Breismeister, et al, Item VII, p. 16
Item 148 Reanalysis of Failed Supports	Affidavit; Breismeister, et al, Item VII, p. 16 Affidavit; Anderson, et al, Exhibit 1, p. 31

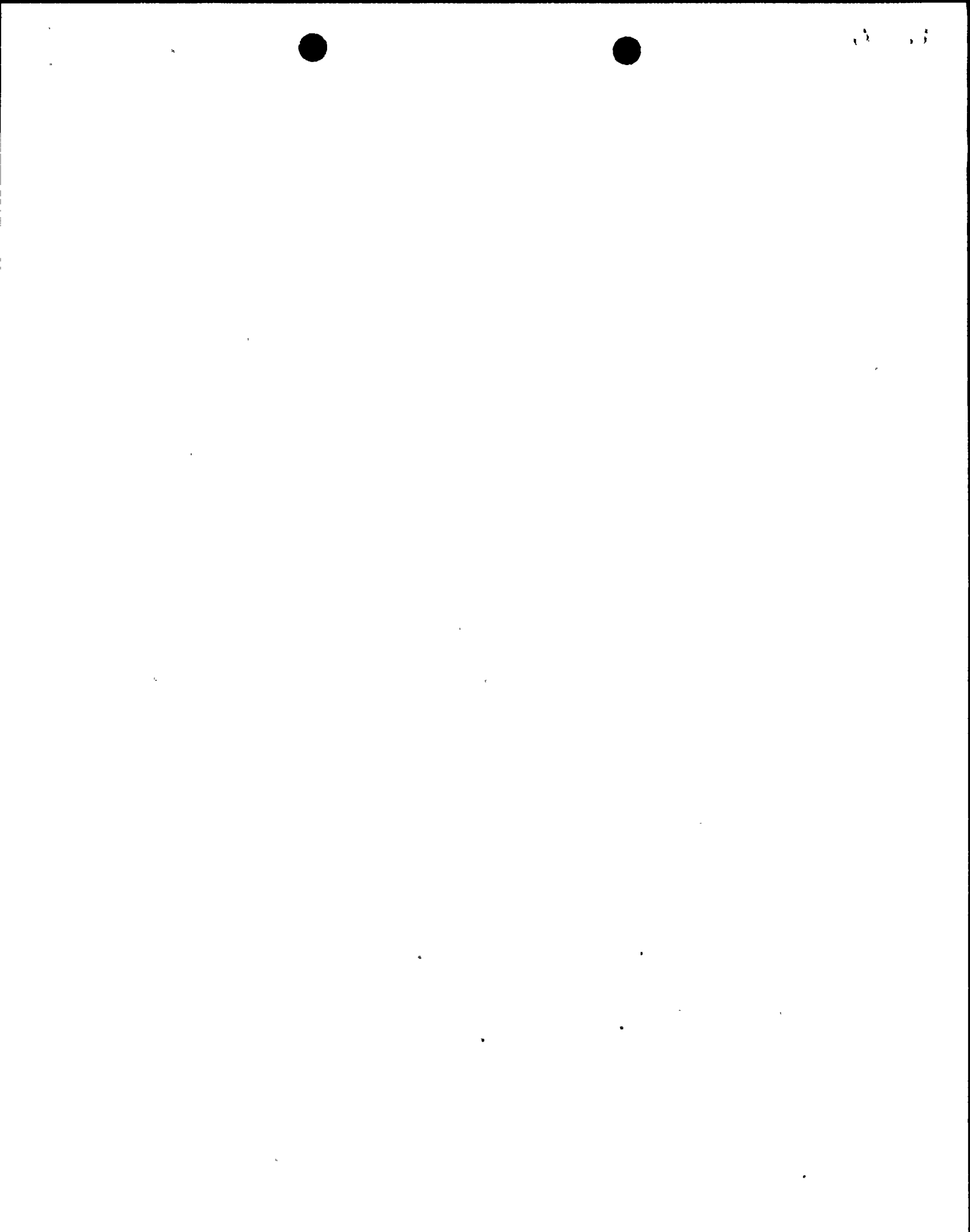


TABLE 2 - DESIGN QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN DQA
March 6, 1984

Item 149 Unintentional Restraints Became Supports	Affidavit; Breismeister, et al, Item XI, p. 23 Affidavit; Anderson, et al, Exhibit 1, p. 21
Item 150 Undocumented Supports to Pass Failed Supports	Affidavit; Breismeister, et al, Item XI, p. 23 Affidavit; Anderson, et al, Exhibit 1, p. 15
Item 151 Certify Modifications Did Not Affect FSAR	Affidavit; Breismeister, et al, Item XLIX, p. 77
*Item 142 a) Drawings of Flare Bevel Welds Inaccurate	Affidavit; Breismeister, et al, Item XIV, p. 28
Item 143 a) Weld Radii 25% Smaller than AWS	Affidavit; Breismeister, et al, Item XIV, p. 28
Item 144 a) Location of Hiti-Bolts	Affidavit; Breismeister, et al, Item XVI, p. 34
Item 145 a) U-bolt Load Ratings Exaggerated	Affidavit; Breismeister, et al, Item IV, p. 8 Affidavit; Anderson, et al, Exhibit 1, p. 24
Item 146 a) Angle Members Too Long For Allowables	Affidavit; Breismeister, et al, Item XV, p. 30 Affidavit; Anderson, et al, Exhibit 1, p. 25

*Items 142 a) through 151 a) are noted with the "a)" to distinguish from the previous identified Items 142 through 151.



TABLE 2 - DESIGN QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN DQA
March 6, 1984

Item 147 a) Blank DR Forms Not Issued	Affidavit; Breismeister, et al Item XIII, p. 26
Item 148 a) Retaliation for Writing DRs	Affidavit; Tresler, et al, par. 18, p. 9 Affidavit, Mangoba, par. 11, p. 5
Item 149 a) Denied Access to Drawings	Affidavit; Shiffer, et al, par. 44, 45, pp. 19, 20
Item 150 a) Reprimanded Technicians for Complaints	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 151 a) Routings of Current Drawings Discontinued	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 152 1982 File Purge	Affidavit; Shiffer, et al, par. 48, p. 21
Item 153 Poor Design-RHR Spurious Closure	Affidavit; Shiffer, et al, par. 14 p. 7
Item 154 RHR Circuitry Misrepresented	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 155 Actuator Power Removed When Auto Closing Desired	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith

TABLE 2 -- DESIGN QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN DQA
March 6, 1984

Item 156	Reprimand	Affidavit; Shiffer, et al, par. 30, p. 14
Item 157	10 CFR 50.55(e) Violation For Not Informing NRC	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 158	Management of Deficiencies Inadequate	Affidavit; Shiffer, et al, par. 31, p. 14
Item 159	Ineffective Correction Action	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 160	NPPR Procedures Violated	Affidavit; Shiffer, et al, par. 49-51, pp. 21, 22
Item 161	Unresolved Safety Question Action Without NRC Approval	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 162	No Control Room Annunciation	Affidavit; Shiffer, et al, par. 16, p. 8
Item 163	QA Unresponsive to NPPR	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 164	SSPS Fuses Close Valves Not Identified on Drawings	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith

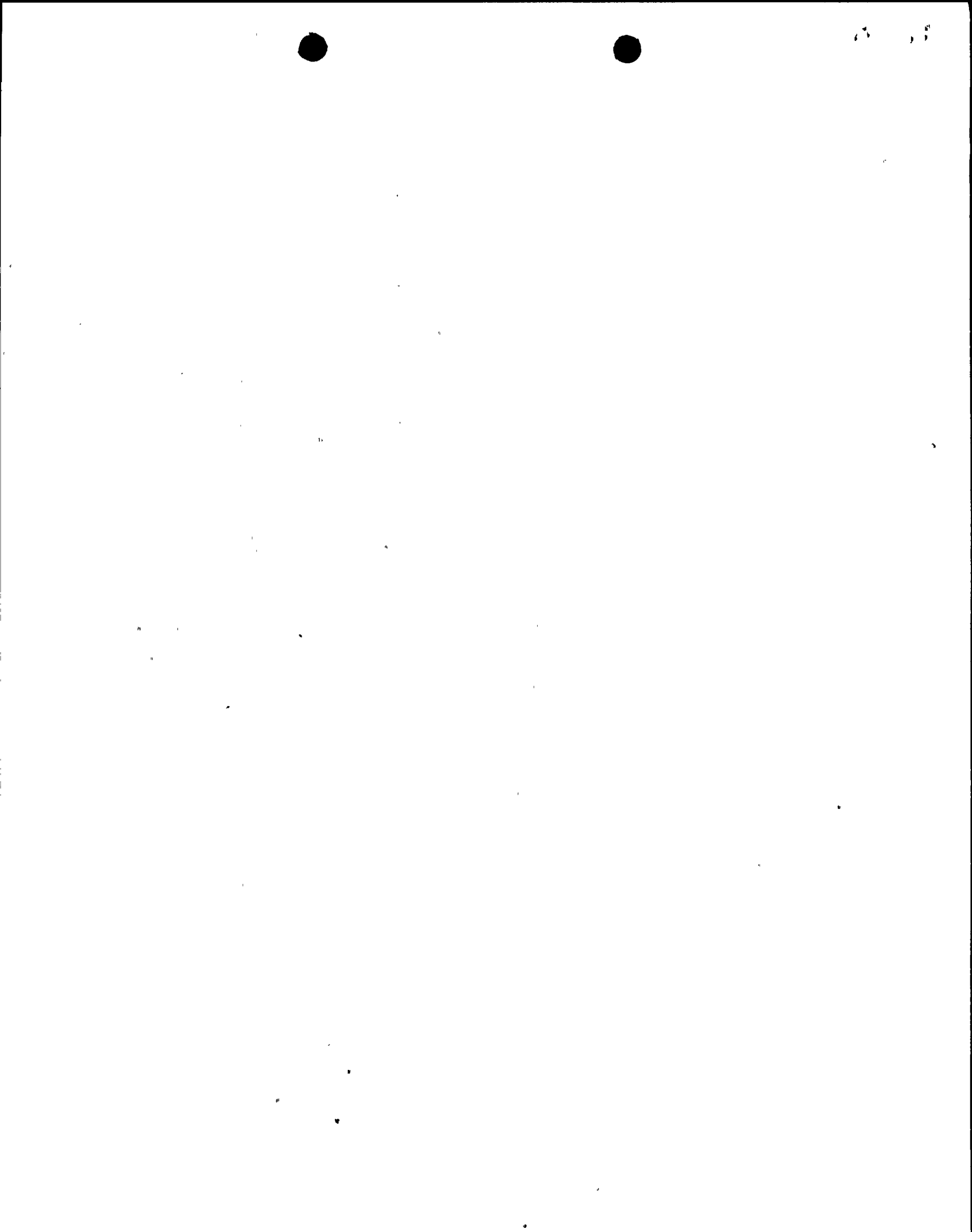


TABLE 2 - DESIGN QA

GAP PETITION
February 2, 1984

PGandE's ANSWER IN OPPOSITION
TO MOTION TO REOPEN DQA
March 6, 1984

Item 165	Drawings Not Updated	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 166	Defective Design Deficiency Corrective Action	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 167	Valve Closure Probability High	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 168	Alleger Transferred	Affidavit; Shiffer, et al, par. 68, 69, p. 27
Item 169	RHR Portion is Safety-Related	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith
Item 170	False Statement - Accuracy of Plant Manuals	See Affidavit of Shiffer, et al, dated March 29, 1984, enclosed herewith

