

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, Unit Nos. 1 and 2)

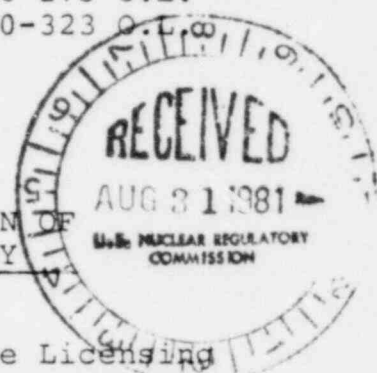
8/26/81
Docket Nos. 50-275 O.L.
50-323 O.L.

GOVERNOR EDMUND G. BROWN JR. FIRST SET OF
INTERROGATORIES AND SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS TO PACIFIC GAS AND ELECTRIC COMPANY

Pursuant to 10 C.F.R. §§ 2.740(b)-2.741, and the Licensing
Board Order of August 4, 1981, Governor Brown propounds the
following Interrogatories and Document Production Requests to
Pacific Gas and Electric Company ("PG&E").

INSTRUCTIONS

1. As used herein, "documents" include, but are not limited to, emergency plans and procedures, construction plans and specifications, papers, photographs, motion pictures, criteria, standards of review, recordings, memoranda, books, records, writings, letters, telegrams, mailgrams, correspondence, notes and minutes of meetings or of conversations or of phone calls, interoffice, intra-corporate memoranda or written communications of any nature, intra-agency memoranda or written communications of any nature, recordings of conversations either in writing or upon any mechanical or electronic or electrical recording devices, notes, exhibits, appraisals, work papers, reports, studies, opinions, analyses, assessments, surveys, evaluations, projections, hypotheses, formulas, designs, drawings, manuals, notebooks, worksheets, contracts, agreements, letter agree-



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ments, diaries, desk calendars, charts, schedules, appointment books, punchcards and computer printout sheets, computer data, telecopier transmissions, directives, proposals, and all drafts, revisions, and differing versions (whether formal or informal) of any of the foregoing, and also all copies of any of the foregoing which differ in any way (including handwritten notations or other written or printed matter of any nature) from the original.

2. These Interrogatories and Document Production Requests are intended as continuing Interrogatories and Production Requests, requiring PG&E to answer by supplemental answer, setting forth any information within the scope of these discovery requests as may be acquired by PG&E, its agents, attorneys or representatives following PG&E's original answers up to the time of hearing.

3. When asked to identify or describe a document, set forth the author(s), date of preparation, title, the subject matter of the document, to whom such document was sent, and the whereabouts of all copies.

4. When an Interrogatory or Production Request seeks a document or information of or in the possession of PG&E, that Interrogatory or Request includes all documents or information in the possession, custody or control of PG&E, including any of its past or present contractors, employees, consultants or agents.

INTERROGATORY 1

(a) Describe and identify each study, evaluation, assessment or other document in the possession, custody or control of PG&E

dealing with or relating in any way to the time(s) necessary for and/or the feasibility of protective actions in the event of a radiological emergency. By way of example only, "protective actions" include an evacuation of the Diablo Canyon site and adjoining areas, including the basic emergency planning zone, the extended planning zone, and the ingestion pathway zone.

(b) Describe which of such documents are completed and which are underway. For those underway, state: (1) what has been completed; (2) what remains to be completed; and (3) the schedule for completion of the remaining work.

INTERROGATORY 2

(a) Identify and describe the criteria that PG&E employees are trained to apply in determining whether to recommend evacuation (onsite and/or offsite) versus sheltering.

(b) Identify and describe all analyses or other documents which support or in any way relate to these criteria.

(c) Identify and describe all training manuals, operating procedures, or other instructive or educational materials that relate in any way to these criteria.

(d) Describe all equipment available to PG&E and/or offsite response personnel to assess and predict the likely consequences of an accidental radioactive release from Diablo Canyon. Include in your response a description of the onsite meteorological tower and computer used to determine real-time atmospheric dilution factors.

INTERROGATORY 3

Identify and describe the public information program for emergency planning and preparedness proposed by PG&E to support PG&E's application for a full power operating license for the Diablo Canyon facility. Identify and describe all documents which in any way relate to this public information program including, without limitation, any brochures, statements to be published in news media or broadcast on radio or TV, materials to be sent to PG&E's customers (enclosed in bills or otherwise), or public notices (in draft or final form), which constitute any part of or relate in any way to the public information program.

INTERROGATORY 4

Has PG&E commenced its full power public information program? If so, describe each and every step taken thus far and the schedule for remaining steps. If not, describe PG&E's schedule for commencement and full implementation of that program.

INTERROGATORY 5

(a) Identify and describe each and every drill or exercise which has occurred relating to or testing all or any part of the PG&E and/or offsite emergency preparedness to implement or carry out duties under the onsite and offsite emergency response plans.

(b) Identify all participants in and observers of each drill or exercise.

(c) Identify and describe all written critiques and other documents (including photographs and motion pictures) which relate in any way to these drills or exercises.

INTERROGATORY 6

(a) Describe all training provided to onsite and offsite emergency response personnel to prepare them to respond to a radiological emergency at Diablo Canyon.

(b) Identify and describe all documents, including critiques, photographs and motion pictures, which pertain in any way to this training, including the complete PG&E training program designed to ensure that PG&E personnel and employees are prepared to respond adequately to a radiological emergency at Diablo Canyon.

INTERROGATORY 7

Describe all equipment available to San Luis Obispo County personnel (including personnel of any of the Cities responding pursuant to the County Plan) to respond to a Diablo Canyon radiological emergency.

INTERROGATORY 8

(a) Describe all plans for notification of transient persons within 10 miles of the Diablo Canyon facility in the event of a radiological emergency. Transient persons include agricultural workers, visitors to Montana de Oro State Park, and other persons who may be temporarily visiting the San Luis Obispo area.

(b) Describe all documents which relate in any way to such notification, including, without limitation, any analyses of the time(s) necessary for and feasibility of notifying persons in the backcountry of Montana de Oro State Park.

INTERROGATORY 9

(a) Describe the seismic qualification, including a description of the earthquake forces (acceleration, velocity and displacement) that the equipment is designed to withstand and still be completely functional, of: (1) the real-time monitors, both onsite and offsite (PG&E Plan, Fig. 7.3-4); (2) the equipment at each of the offsite environmental monitoring stations (Figure 7.3-3); (3) the sirens utilized in the early warning system (Figure 7.2-8); and (4) the onsite meteorological tower.

(b) Identify and describe the manufacturer and the model numbers of all such equipment.

(c) Describe the structures to which all such equipment is attached and the seismic qualification of such structures.

(d) Identify and describe any tests or analyses which have been performed either by PG&E or others on the qualification, characteristics, and response features of the foregoing equipment and structures proposed for use at Diablo Canyon, onsite and offsite.

INTERROGATORY 10

What is the status of implementation, testing and activation of the public notification system sirens (see PG&E Plan, Rev. 2, Figure 7.2-8)? In your response, do the following:

- (a) Describe how each siren is mounted;
- (b) Identify the final selected location of each siren;
- (c) The criteria for choosing each siren location;

- (d) The population covered by each siren;
- (e) The estimated population (both permanent and transient) within the early warning boundary system (see Figure 7.2-8) which is not covered by the siren system;
- (f) The means, if any, by which the population not covered by the siren system will be notified of a Diablo Canyon emergency;
- (g) Describe all tests of the siren system, including (1) tests designed to test the coverage of individual sirens and (2) tests designed to determine the seismic qualification of the siren system; and
- (h) Identify and describe all documents which relate in any way to (a) - (g) above.

INTERROGATORY 11

Attached to Revision 2 of the Diablo Canyon Emergency Response Plan are a number of agreements. For example, there are agreements with French Hospital and with San Luis Obispo Ambulance Service.

(a) Identify and describe: (1) all updated versions of these agreements; and (2) any other agreements which PG&E believes support in any way the preparedness of PG&E and/or offsite entities to respond to a radiological emergency at Diablo Canyon.

(b) Describe all plans of PG&E to enter into any further agreements related to emergency planning and preparedness that are in addition to those included in Revision 2 of PG&E's Emergency Response Plan.

INTERROGATORY 12

(a) Is it PG&E's position that prior to full power operation, the onsite and offsite emergency preparedness at Diablo Canyon will comply fully with each and every one of the Planning Standards in Section 50.47(b)?

(b) If the answer is YES, describe in detail the basis for and specifically demonstrate the means by which each Planning Standard will be satisfied.

(c) If the answer is NO, describe each deficiency that PG&E anticipates and state whether PG&E, in that event, will rely on Section 50.47(c)(1) to support licensing of Diablo Canyon despite such deficiency.

(d) For each such deficiency, provide the technical basis for use of Section 50.47(c)(1).

INTERROGATORY 13

Describe each and every standard operating procedure for the San Luis Obispo County Emergency Plan (i.e., the draft version dated May 1981) which is in PG&E's possession, custody, or control, including the possession, custody, or control of PG&E's agents, consultants, or contractors.

INTERROGATORY 14

(a) Describe each and every system or means that PG&E plans to have available for communicating from the Diablo Canyon site to offsite governmental authorities. Include in your answer a description of: (1) the seismic qualification of each such communi-

cation system and related equipment and structures; and (2) all analyses, tests, and other documents which relate in any way to these systems and structures.

(b) Which of these systems does PG&E intend to use for communicating with each of the following governmental authorities: San Luis Obispo County, the City of San Luis Obispo, the State of California (specifically, the Governor's Office, the Office of Emergency Services, and the Highway Patrol), the Nuclear Regulatory Commission (specifically, the regional office and headquarters), FEMA (specifically, the regional office and headquarters), and the Cities of Atascadero, Arroyo Grande, Grover City, Morro Bay, Paso Robles, and Pismo Beach.

(c) With respect to each of such cities, whom does PG&E intend to contact in the event of a radiological emergency at Diablo Canyon?

INTERROGATORY 15

(a) List each and every person PG&E may call or subpoena as a witness to any hearing which may be held on the emergency preparedness contention admitted by the Licensing Board in its Order of August 4, 1981.

(b) As to each witness, please state:

(1) The name, occupation, address and telephone number of each such person and whether that person may appear for PG&E as a voluntary witness or a subpoenaed witness.

- (2) The field or science in which such person is sufficiently schooled and/or experienced to enable him or her to express opinion evidence.
- (3) The qualifications of each such witness.
- (4) Whether such witness will base his or her opinion in whole or in part upon facts acquired personally by that person in the course of an investigation or examination as to the facts, or solely upon information provided that person by others. If on the basis of investigation or examination, please describe such and state the nature and dates of such. If on the basis of information provided by others, please identify such others and state their qualifications.
- (5) Each and every fact and each and every document, photograph or report or item, or other tangible object supplied or made available to each such person.
- (6) Whether each such witness rendered written reports regarding facts, bases, or opinions as respects your answers to these interrogatories. If so, state the date of each such report and the name and address of the custodian of each such report.
- (7) A summary of each such witness' proposed testimony.

- (8) Identify any other NRC proceedings in which such witness has previously testified and provide copies of such testimony.

INTERROGATORY 16

(a) Identify each and every complicating effect on onsite and offsite emergency preparedness that PG&E believes would result from: (1) the 7.5 M Safe Shutdown Earthquake ("SSE") on the Hosgri Fault; (2) the Operating Basis Earthquake ("OBE"); and (3) an earthquake greater than the 7.5 M SSE.

(b) Identify all analyses, reports, or other documents which relate in any way to the complicating effects of an earthquake, including complications to the northern and southern evacuation routes from the Diablo Canyon site.

INTERROGATORY 17

Describe all reports, assessments, studies, analyses, or other documents (written, filmed, or recorded) being prepared by or for PG&E that deal with any of the following:

- (a) The effects of an earthquake on emergency response to a radiological emergency;
- (b) Evacuation time estimates for the evacuation of the Diablo Canyon facility and the emergency planning zones surrounding the facility;
- (c) The Diablo Canyon public information program; and

- (d) The consequences of a radiological emergency at Diablo Canyon on the capability of offsite entities to provide assistance to PG&E.

For each item described, specify who is preparing the item, when it is scheduled to be completed, and what the purpose(s) of the item is (are) intended to be.

INTERROGATORY 18

State in detail each and every fact which PG&E believes evidences that PG&E's Emergency Response Plan will comply with 10 C.F.R. § 50.33(g) by October 1, 1981.

INTERROGATORY 19

State in detail each and every fact which PG&E believes evidences that the State of California's Emergency Response Plan will comply with 10 C.F.R. § 50.33(g) by October 1, 1981.

INTERROGATORY 20

State in detail each and every fact which PG&E believes evidences that the County of San Luis Obispo's Emergency Response Plan will comply with 10 C.F.R. § 50.33(g) by October 1, 1981.

INTERROGATORY 21

State in detail each and every fact which PG&E believes evidences that PG&E's Emergency Response Plan will comply with 10 C.F.R. § 50.47 by October 1, 1981.

INTERROGATORY 22

State in detail each and every fact which PG&E believes evidences that the State of California's Emergency Response Plan will comply with 10 C.F.R. § 50.47 by October 1, 1981.

INTERROGATORY 23

State in detail each and every fact which PG&E believes evidences that the County of San Luis Obispo's Emergency Response Plan will comply with 10 C.F.R. § 50.47 by October 1, 1981.

INTERROGATORY 24

State in detail each and every fact which PG&E believes evidences that the PG&E Emergency Response Plan will comply with 10 C.F.R. Part 50, Appendix E, by October 1, 1981.

INTERROGATORY 25

State in detail each and every fact which PG&E believes evidences that the State of California's Emergency Response Plan will comply with 10 C.F.R. Part 50, Appendix E, by October 1, 1981.

INTERROGATORY 26

State in detail each and every fact which PG&E believes evidences that the County of San Luis Obispo's Emergency Response Plan will comply with 10 C.F.R. Part 50, Appendix E, by October 1, 1981.

INTERROGATORY 27

(a) Is it PG&E's position that the Diablo Canyon TSC, OSC, and EOF meet the reliability requirements of NUREG-0696? See NUREG-0696, p. 5.

(b) If the answer is YES, state in detail each and every fact that supports such position.

(c) If NO, please explain in detail.

(d) Identify and describe all documents which relate in any way to the emergency response facilities' compliance or non-compliance with these NUREG requirements.

INTERROGATORY 28

(a) Is it PG&E's position that the Diablo Canyon interim EOF meets the requirement that it be "well engineered for the design life of plant?" NUREG-0696, p. 18.

(b) If YES, identify and describe all analyses or other documents which relate in any way to the EOF's compliance or noncompliance with this requirement.

(c) If NO, please explain in detail, including a description of all documents which relate thereto.

(d) Describe the seismic qualification of PG&E's interim EOF, including a description of the facility and all analyses or other documents which relate in any way to the likelihood that that facility and all equipment therein would remain functional in the OBE, the SSE, and in the event of an earthquake greater than the SSE.

INTERROGATORY 29

Identify and describe: (a) all measures taken by PG&E to integrate its security plan with its emergency plan; (b) all training provided to security personnel concerning the onsite emergency plan; (c) all drills or exercises of the emergency plan that involve the threat designated by 10 C.F.R. § 73.1; and (d) all meetings held by PG&E with State and/or County officials concerning situations that would involve both the onsite and offsite emergency plan and the security plan.

INTERROGATORY 30

Describe all human factors or other analyses which have been performed on or are proposed to be performed on PG&E's emergency operating procedures. When and by whom was each analysis performed?

INTERROGATORY 31

Describe all equipment which has not been seismically and environmentally qualified but which PG&E may use or rely upon in any way during a radiological emergency at Diablo Canyon. Include in your response a description of the use(s) of each identified item of equipment.

INTERROGATORY 32

On Thursday, August 20, 1981, representatives of PG&E, San Luis Obispo County, and others met at the Sheriff's office to

discuss, inter alia, the emergency exercise which was conducted on August 19, 1981.

(a) Who was present at the August 20, 1981 meeting on behalf of PG&E?

(b) Describe all statements of PG&E made at that meeting, including, without limitation, any statements concerning problems identified in the August 19 exercise.

(c) Identify and describe all documents which relate in any way to the August 20, 1981 meeting, including: (1) any notes taken by any person identified in (a) above, (2) any documents taken to the meeting by any such person; and (3) any memoranda or other documents prepared after the meeting which relate in any way to the meeting or to the August 19 exercise.

INTERROGATORY 33

Describe the Uniform Dose Assessment Center ("UDAC") and its functions. Does PG&E contend that UDAC and related equipment will remain fully functional in the event of the OBE?, the SSE?, an earthquake greater than the SSE? Describe all analyses or other documents which relate in any way to UDAC and/or its seismic qualification.

INTERROGATORY 34

For the OBE and the SSE, provide the peak horizontal ground accelerations, velocity, and displacement which PG&E predicts will occur at each of the following locations:

- (a) The onsite meteorological tower.
- (b) The mountain-top radio repeater.
- (c) Morro Bay.
- (d) The PG&E Information Center.
- (e) The Avila Beach guard station.
- (f) The EOF.
- (g) Each siren location.
- (h) Each offsite environmental monitoring station.
- (i) Each real-time monitoring station.
- (j) The Montana de Oro campground.
- (k) San Luis Ambulance Service.
- (l) French Hospital.
- (m) Shell Beach.
- (n) Pismo Beach.

DOCUMENT PRODUCTION REQUESTS

1. Produce all documents identified and/or described in response to Interrogatories 1-34.

2. Produce all documents (including movies and photographs) which describe, critique, or in any way relate to the August 19 emergency preparedness exercise.

These documents are to be produced at the offices of the undersigned counsel, 1900 M Street, N.W., Washington, D.C. 20036, within 30 days of service of this request.

Respectfully submitted,

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State of California

August 26, 1981