

10/14/81

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)

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

NRC STAFF'S SECOND SET OF INTERROGATORIES  
TO GOVERNOR EDMUND G. BROWN, JR.

Pursuant to 10 C.F.R. § 2.740(b), the NRC Staff serves the following  
interrogatories on Governor Edmund G. Brown, Jr.

INSTRUCTIONS AND DEFINITIONS

1. Information sought in these interrogatories shall include information within the knowledge, possession, control or access of any agents, employees and independent contractors of Governor Brown.
2. As used herein, "documents" includes, but is not limited to papers, photographs, 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-agency or interagency 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, surveys, evaluations, projections, hypotheses, formulas, designs, drawings, manuals, notebooks, worksheets, contracts, agreements,

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letter agreements, 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.

3. Each interrogatory should be answered in five parts as follows:
  - a. Answer the direct question asked or provide the information requested.
  - b. State completely any documents used as the basis for the answer to the interrogatory.
  - c. State completely any documents consulted, but not relied upon as a basis for preparation of your response to the interrogatory.
  - d. Give the name and professional qualifications of any individual who will testify on behalf of Governor Brown as to the answer given in the interrogatory. Include a statement of professional qualifications for any identified individual.
  - e. Give the name and address of any individual, corporation, business, professional association, state or local official, or other organization which served, serves, or it is planned will serve as advisor, witness or consultant to Governor Brown on the issue addressed in each interrogatory.

Interrogatory 1

Name each piece of equipment associated with Diablo Canyon's pressurizer heaters that Governor Brown believes should be required to meet all applicable safety-grade design criteria, including but not limited to diversity (GDC 22), seismic and environmental qualification (GDC 2 and 4), automatic initiation (GDC 20), separation and independence (GDC 3 and 22), quality assurance (GDC 1), adequate, reliable on-site power supplies (GDC 17) and the single failure criteria.

Interrogatory 2

What is the basis for Governor Brown's belief that the equipment identified in the answer to Interrogatory #1 should be required to meet all applicable safety-grade criteria?

Interrogatory 3

For each piece of equipment identified in the answer to Interrogatory #1, identify a) the design criteria Governor Brown believes it should be required to meet; and b) the applicable NRC regulation(s) or other statutory provision(s) which Governor Brown believes requires the equipment to meet the criteria identified in his response to 3(a).

Interrogatory 4

Identify the NRC regulation(s) or other statutory provision(s) which Governor Brown believes requires PG&E to have Diablo Canyon's pressurizer heaters and associated controls meet all applicable safety-grade design criteria, including but not limited to diversity (GDC 22), seismic and

environmental qualification (GDC 2 and 4), automatic initiation (GDC 20), separation and independence (GDC 3 and 22), quality assurance (GDC 1), adequate, reliable on-site power supplies (GDC 17) and the single failure criterion.

Interrogatory 5

Specifically state why Governor Brown believes the equipment associated with Diablo Canyon's pressurizer heaters should be classified as "components important to safety."

Interrogatory 6

Contention 10 alleges that the heater groups should be required to meet certain GDC's identified in the contention. How does Governor Brown believe the applicant's proposal to connect two out of four of the heater groups to Diablo Canyon's present on-site emergency power supplies fails to provide an equivalent or acceptable level of protection to the level of protection which would be provided if the identified GDC's were met?

Interrogatory 7

Under NRC regulation(s), what general design criteria does Governor Brown believe must be met by PG&E in order to connect two out of four of the heater groups to the present on-site emergency power supplies?

Interrogatory 8

Specify how Governor Brown believes PG&E has failed to comply with the NRC regulation(s) identified in the answer to Interrogatory #4 and

with the general design criteria identified in the answer to Interrogatory #7.

Interrogatory 9

Specify how Governor Brown believes the pressurizer heaters and associated controls at Diablo Canyon fail to comply with (GDC 20) "automatic initiation"; (GDC 17), "reliable on-site power supplies"; (GDC 22), "protection system independence"; (GDC 2), "seismic and environmental qualification"; (GDC 4), "seismic and environmental qualification"; (GDC 3) "fire protection"; and (GDC 1) "quality standards and records" in 10 C.F.R. § 50, Appendix A.

Interrogatory 10

State specifically the reasons why Governor Brown believes that PG&E's proposal to connect two out of four of the heater groups to Diablo Canyon's present on-site emergency power supplies fails to protect the public health and safety and give the reasons why Governor Brown believes that the equipment associated with Diablo Canyon's pressurizer heaters fails to protect the public health and safety.

Interrogatory 11

What additional information does Governor Brown believe should be provided by PG&E to insure that the equipment associated with Diablo Canyon's pressurizer heaters is adequate to protect the public health and safety and that the proposal to connect two out of four of the heater

groups to Diablo Canyon's present on-site emergency power supplies is adequate to protect the public health and safety?

Interrogatory 12

Specify the NRC regulation(s), safety-grade criteria, NUREG(s), Standard Review Plans, Regulatory Guide(s) or statutory provision(s) Governor Brown believes the pressurizer power-operated relief valves (PORVs), safety valves and block valves at Diablo Canyon are required to meet.

Interrogatory 13

State specifically the reasons why Governor Brown believes that PG&E has not met the requirements, criteria and guidance stated in the answer to Interrogatory 21.

Interrogatory 14

Give detailed reasons why Governor Brown believes that Diablo Canyon's PORVs, safety valves and block valves must be classified as components important to safety.

Interrogatory 15

Explain every scenario and the probability of occurrence in which Governor Brown believes failure of Diablo Canyon's PORVs, safety valves and block valves could cause or aggravate a LOCA or operational transient.

Interrogatory 16

State specifically the reasons why Governor Brown believes that the operation of Diablo Canyon's PORVs, safety valves, and block valves are deficient to protect the public health and safety.

Interrogatory 17

What additional information does Governor Brown believe should be provided by PG&E to insure that operation of Diablo Canyon's PORVs, safety valves and block valves is adequate to protect the public health and safety?

Interrogatory 18

Name each instrument and control Governor Brown believes is associated with Diablo Canyon's PORVs and associated block valves.

Interrogatory 19

Why does Governor Brown believe the instrument(s) and control(s) identified in the answer to Interrogatory 18 should be classified as safety-graded design criteria?

Interrogatory 20

For each instrument and control identified in the answer to Interrogatory 18, identify the design criteria Governor Brown believes it should be required to meet.

Interrogatory 21

Specify how Governor Brown believes the pressurizer PORVs, and safety valves at Diablo Canyon fail to meet (GDC 1), "quality standards and records"; (GDC 14), "reactor coolant pressure boundary"; (GDC 15), "reactor coolant system design"; and (GDC 30), "quality of reactor coolant pressure boundary" in 10 C.F.R. 50, Appendix A.

Interrogatory 22

Specify how Governor Brown believes Diablo Canyon's pressurizer PORVs and pressurizer safety valves fail to meet Standard Review Plan (SRP) 3.9.2, "Dynamic Testing and Analyses of Systems, Components, and Equipment"; (SRP) 3.9.3., "ASME Code Class 1, 2 and 3 Components, Component Supports, and Core Support Structures"; Regulatory Guide 1.48 "Design limits and loading combinations for seismic Category 1 fluid systems components"; and Regulatory Guide 1.68 "Pre-operational and Initial Startup Test Programs for Water Cooled Power Reactors."

Interrogatory 23

Why does Governor Brown believe the safety-classification as shown in the FSAR for pressurizer PORV block valves at Diablo Canyon is not adequate to protect the health and safety of the public?

Interrogatory 24

What additional information does Governor Brown believe should be provided by PG&E to insure that the pressurizer PORV block valves at

Diablo Canyon are adequate to protect the health and safety of the public?

Interrogatory 25

What does Governor Brown believe that designating block valves as safety-related equipment is not adequate to protect the health and safety of the public?

Interrogatory 26

What are the reasons why Governor Brown believes that block valves should be designated as safety-grade equipment?

Interrogatory 27

Explain in detail how Governor Brown believes the pressurizer power-operated relief valves, safety valves and PORV block valves should be tested and qualified for correct and reliable operation over the range of accident conditions which the Diablo Canyon plant may experience.

Interrogatory 28

For each of the statements in NRC Staff's Request for Admissions by Governor Edmund G. Brown (October 14, 1980) which Governor Brown does not admit, identify the witness(es) which Governor Brown will present on that issue.

Interrogatory 29

For each of the statements in NRC Staff's Request for Admissions by Governor Edmund G. Brown (October 14, 1980) which Governor Brown does not admit, explain the basis for Governor Brown's position on that statement including any documents relied upon.

Interrogatory 30

What is the basis for Joint Intervenors' belief that, if classified as "components important to safety," the pressurizer heaters and valves identified in admitted Contentions 10 and 12 from the low power proceeding must meet the GDCs and other requirements listed in those contentions.

Interrogatory 31

State any rule(s), regulation(s) or other statute(s) which require equipment or systems designated as "components important to safety" to meet the GDCs and other requirements listed in Contentions 10 and 12 from the low power proceeding.

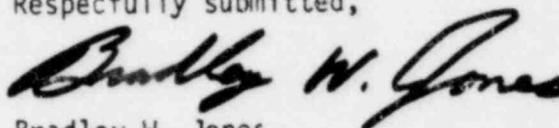
Document Requests

1. Provide all documents identified in Governor Brown's answers to Interrogatories 1 through 31 which are not already in the possession of the U.S. Nuclear Regulatory Commission.

2. Provide all documents within the possession or control of Governor Brown which relate to the pressurizer heaters for the Diablo Canyon Nuclear Facility, which are not already in the possession of the U.S. Nuclear Regulatory Commission.

3. Provide all documents within the possession or control of Governor Brown which relate to power operated relief valves, safety valves, associated block valves and the instruments and controls for these valves for the Diablo Canyon Nuclear Facility, which are not already in the possession of the U.S. Nuclear Regulatory Commission.

Respectfully submitted,



Bradley W. Jones  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 14th day of October, 1981

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CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF'S SECOND SET OF INTERROGATORIES TO GOVERNOR EDMUND G. BROWN, JR. in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 14th day of October, 1981.

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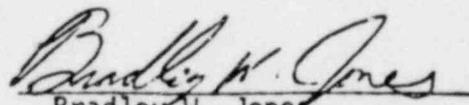
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