

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

APPLICANT PACIFIC GAS AND ELECTRIC COMPANY'S  
THIRD SET OF INTERROGATORIES  
TO JOINT INTERVENORS

Pursuant to 10 C.F.R. §§2.740-2.741, and the Board Order of August 4, 1981, Applicant PACIFIC GAS AND ELECTRIC COMPANY ("Applicant") hereby propounds the following Interrogatories to Joint Intervenors.

INSTRUCTIONS

1. All information is to be divulged which is in the possession of the individual or corporate party, their attorneys, investigators, agents, employees or other representatives of the named party and their attorneys.
2. Where an individual Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so that it is understandable.
3. In the event the space provided is not sufficient for your answer to any of the questions, please attach a separate sheet of paper with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to answer by supplemental answer, setting forth any information within the scope of the Interrogatories as may be acquired by you, your agents, attorneys or representatives following your original answers up to the time of hearing.

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1. State in detail each and every fact upon which you base your contention that the proper operation of power operated relief valves and associated block valves is essential to mitigate the consequences of accidents at Diablo Canyon.

2. State in detail each and every fact upon which you base your contention that the proper operation of the instruments and controls for power operated relief valves and associated block valves is essential to mitigate the consequences of accidents at Diablo Canyon.





10. For each and every power operated relief valve and/or associated block valve at Diablo Canyon that Joint Intervenor believes has not met all safety-grade design criteria state:
  - (a) The location of each such valve.
  - (b) The intended purpose of each such valve.
  - (c) How each such valve's failure could cause a LOCA.
  - (d) How each such valve's failure could aggravate a LOCA.
  - (e) Each and every fact upon which you base your belief that the valve has not met all safety-grade design criteria.
  
11. State each and every fact upon which Joint Intervenors base their allegation that the "staff recognizes that pressurizer heaters and associated controls are necessary to maintain natural circulation at hot stand-by conditions."



15. State in detail each and every fact upon which Joint Intervenors base their allegation that the Applicant's proposal to connect two out of four of the heater groups to the present on-site emergency power supplies does not provide an "equivalent or acceptable level of protection."
  
16. Identify each and every document upon which you base any answer to the preceding interrogatories and for each such document:
  - (a) State the name, author, and date of the document.
  - (b) Identify the interrogatory answer to which the document relates.
  - (c) Identify the specific page(s) of the document which relates to the answer.
  
17. Identify each and every document or exhibit Joint Intervenors may introduce into evidence as respects any pending contentions in these proceedings.

18. Identify each and every witness Joint Intervenors may call or subpoena to the hearing on the matters presently pending. For each such witness, state:

- (a) The name, occupation, address and telephone number of each such person and whether that person may appear for you as a voluntary witness or as subpoenaed witness.
- (b) The field or science in which each such person is sufficiently schooled to enable him to express opinion evidence in this matter, if any.
- (c) Whether such witness will base his opinion:
  - (i) 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
  - (ii) solely upon information provided that person by others.
- (d) The qualifications of each such person that would qualify that person, if possible, as an expert witness.
- (e) If any such witness has made a personal investigation or examination relating to any of the facts or bases set forth in the answers to preceding interrogatories, state the date(s) and nature of each such investigation or examination.
- (f) Each and every fact, and each and every document, photograph, report, item, or other tangible object supplied or made available to each such person for purposes of formulating his opinions in this matter.
- (g) Whether each such person has rendered written reports, regarding facts, bases, or opinions as respects your answers to the preceding interrogatories or that person's contemplated testimony. If so, state:
  - (i) the date(s) of each such report; and
  - (ii) the name and address of the custodian of each such report.



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 )  
(Diablo Canyon Nuclear Power )  
Plant, Units No. 1 and 2 ) (Full Power Proceeding)

CERTIFICATE OF SERVICE

I hereby certify that copies of "APPLICANT PACIFIC GAS AND ELECTRIC COMPANY'S THIRD SET OF INTERROGATORIES TO JOINT INTERVENORS AND GOVERNOR BROWN", dated October 15, 1981, have been served on the following by deposit in the United States mail, postage prepaid, this 15th day of October, 1981:

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