

NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

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



JOINT INTERVENORS' THIRD SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO THE NUCLEAR REGULATORY COMMISSION STAFF

I. Interrogatories

Please use the same instructions as those given in Joint
Intervenors' first set of interrogatories to the Nuclear
Regulatory Commission Staff ("Staff").

69. For each of the components, systems, or facilities listed
below, state whether you contend that it has been seismically
qualified to withstand and continue to function in the event
of a 7.5 magnitude earthquake on the Hosgri Fault, and state
each and every fact upon which your response is based.
Include in your response a description of all qualification
tests performed, the date of such tests, the persons or
entities conducting the tests, and any modifications to the

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component, system, or facility tested which were made as a result of such testing.

- (a) Early Warning System sirens (and related compressors and compressor platforms) located within the Diablo Canyon plume exposure pathway EPZ;
- (b) PGandE telecommunications equipment racks, battery racks, antennae, and supports;
- (c) mountaintop PGandE Private Microwave System repeaters;
- (d) mountaintop UHF and VHF Radio System repeaters located at Davis Peak, Tepusquet Peak, and Tassajera Peak;
- (e) Emergency Broadcast System radio transmission towers;
- (f) Early Warning System transmitters (located at Davis Peak, Rocky Butte, Cuesta Peak, Morro Bay, San Luis Obispo, and Pismo Beach) and encoders (located at the San Luis Sheriff's Office and the California Department of Forestry);
- (g) offsite Emergency Operations Facility and associated cables, wiring, and equipment;
- (h) San Luis Obispo County Emergency Operations Center and associated cables, wiring, and equipment;
- (i) onsite Technical Support Center and associated cables, wiring and equipment;
- (j) radiological monitoring stations
- (k) PGandE onsite meteorological tower and associated cables, wiring, and equipment.
- (l) UDAC and associated cables, wiring, and equipment.

70. With respect to each of the components, systems, or facilities listed in Interrogatory No. 69, state whether you contend that such component, system, or facility need not be seismically qualified to withstand and continue to function in the event of a 7.5 magnitude earthquake on the Hosgri Fault, and state each and every fact upon which your response is based.
71. List each and every agreement and/or contract between PGandE or San Luis Obispo County and any third party for the provision by such third party of services, assistance, workers, equipment, and/or vehicles for the repair of damage resulting from an earthquake on the Hosgri Fault which accompanies a radiological emergency at Diablo Canyon, and specify precisely:
- (a) whether the agreement and/or contract is formal or informal;
 - (b) the party or entity committing to provide such services, assistance, workers, equipment, or vehicles;
 - (c) the substance of such agreement and/or contract;
 - (d) the type and number of services, assistance, workers, equipment, or vehicles agreed to be provided;
 - (d) whether such agreement and/or contract specifically provides for the provision of such services, assistance, workers, equipment, or vehicles when there is a risk of radiation exposure to such workers, equipment, or vehicles;

(f) the address of the party or entity committing to provide services, assistance, workers, equipment, or vehicles and the location of such equipment or vehicles.

72. At section 6 of the TERA Corporation Report entitled "Earthquake Emergency Planning at Diablo Canyon," a number of "special tasks that might have to be performed following a major earthquake and radiological emergency" are identified. Included among these tasks are

- (a) damage reconnaissance;
- (b) emergency repair and/or restoration of key transportation routes;
- (c) clearing debris from key transportation routes;
- (d) coordination with law enforcement agencies for barricading of certain areas;
- (d) procurement and allocation of transportation resources;
- (f) traffic control; and
- (g) evaluation and determination of protective actions to be taken by nonessential PGandE employees and by the public.

As to each of these individual tasks in the event of a 7.5 magnitude earthquake on the Hosgri Fault, state precisely

- (1) how many persons would be needed to perform the specified task;
- (2) how many PGandE employees would be available to perform the specified task;
- (3) how many County or State personnel would be available to perform the specified task;

- (4) how many other persons would be available to perform the specified task;
 - (5) a list of any and all agreements and/or contracts in which specific commitments have been made to supply personnel;
 - (6) every fact upon which your responses to subparts (1) through (5) of this interrogatory are based.
73. State whether you contend that the TERA Corporation Report cited supra satisfies the NRC Staff's December 16, 1980 request that PGandE provide analyses of the complicating effects of earthquakes on the Diablo Canyon emergency plans, and state each fact upon which your response is based.
74. Describe in detail the specific changes which will be made in the relevant applicant, State and local emergency plans based on the information, findings, and recommendations contained in the TERA Corporation Report cited supra.
75. Do you contend that sheltering will, under certain circumstances, be a preferable protective action alternative to evacuation? If so, state what those circumstances are and each and every fact upon which your response is based. List each and every study report, and/or analysis which supports your conclusion.
76. State where, if at all, in the evacuation times assessment prepared for Diablo Canyon and submitted by PGandE the estimates are adjusted for delays likely to result from "spontaneous evacuation" by persons other than those within a specified evacuation area.

77. On p. 4 of the Staff's response to Joint Intervenors' first set of interrogatories ("Staff Response"), you state that an upgraded meteorological program, an alert system, and a public information system "are now being implemented." Describe in detail the basis for that statement.
78. On p. 12 of the Staff Response, you state that the "offsite plans do not specifically address the effect of a major earthquake which occurs simultaneously with a radiological emergency at Diablo Canyon."
- (a) State whether you contend that such offsite plans need not consider the complicating factors which might be caused by earthquakes in the development of emergency plans for a nuclear power plant, and, if not, state each and every fact upon which your response is based.
- (b) With respect to the San Luis Obispo County plans and the State of California plan, state how such complicating effects are addressed, if at all.
79. On p. 13 of the Staff Response, you state that "this [communications] equipment is considered to be adequate for communications following an earthquake." Describe in detail the basis for that conclusion and cite each and every study, analysis or test prepared, conducted, or reviewed by you in reaching the conclusion.
80. On p. 13 of the Staff Response, you cite a contract with a helicopter company "to furnish transportation to and from the

plant following an earthquake if all other means of transportation are inoperative." State precisely:

- (a) the factual basis for your conclusion that such a contract will provide an adequate means of transportation to and from the plant;
 - (b) the number of helicopters to be provided under the contract on an emergency basis;
 - (c) the number of persons which the helicopter(s) in question can transport at one time;
 - (d) a description of any and all drills or exercises of which you are aware which support the statement quoted.
81. Do you contend that the letters of agreement contained in Draft 3 of PGandE's onsite plan comply with all applicable NUREG-0654 criteria and, if so, what is the basis for your conclusion that they satisfy criterion II.A.3? Do you contend that any other agreements are necessary?
82. On p. 18 of the Staff Response, you cite various methods of public notification. What is the basis for your conclusion that any of the methods cited can be implemented and, if implemented, will be successful in notifying all members of the public? Describe any and all studies upon which you rely in concluding that the area-wide siren system will successfully cover the plume exposure EPZ.
83. On p. 21 of the Staff Response, you describe the PGandE public information program.

- (a) Describe the proposed implementation schedule for the program.
- (b) What, if anything, has been or will be done to inform visitors to the beaches and parks (including Pismo, Cayucos, Morro Strand, and Atascadaero) as required by 10 C.F.R. § 50.47(b)(7)?
84. On p. 23 of the Staff Response, you refer to the plant conditions listed in Section 4 of the Diablo Canyon onsite plan and the guidance of Appendix 1 to NUREG-0654. Describe any and all training received by PG&E personnel and County personnel in the application of that guidance to determine what protective actions to recommend or order.
85. On p. 26 of the Staff Response, you note that San Luis Obispo County has prepared certain emergency plans. What efforts have been made specifically to coordinate PG&E's emergency response organization with all officials responsible for local emergency preparedness and response in the jurisdictions cited in Joint Intervenors' Interrogatory No. 25?
86. With respect to the TERA Corporation Report entitled "Earthquake Emergency Planning at Diablo Canyon," state whether you contend that the maximum acceleration at the plant postulated for purposes of that report is properly calculated as less than the .75g acceleration postulated for the SSE in the Diablo Canyon seismic proceeding, and, if so, state each and every fact upon which your response is based.

II. Request for Production of Documents

Please use the same instructions as those given in Joint Intervenors' second request for production of documents to the NRC Staff, except that the date for production shall be on or before November 20, 1981, unless another time is agreed upon by the parties or specified by the board.

1. All documents identified in, relied upon, or relevant to the responses to Interrogatory Nos. 69-86 supra.

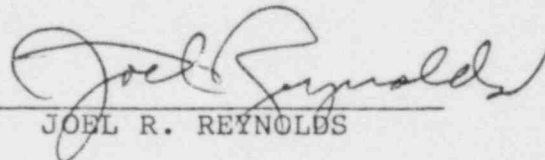
Dated: October 22, 1981

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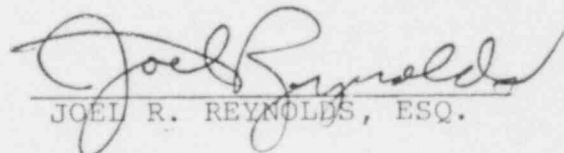
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