

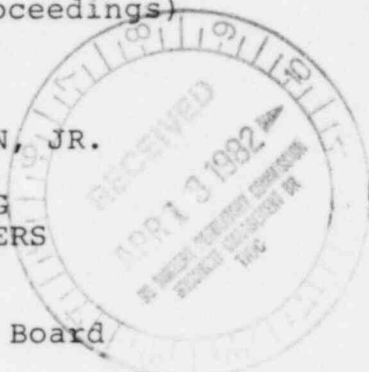
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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

Docket No. 50-275  
Docket No. 50-323  
(Full-Power Proceedings)

PACIFIC GAS AND ELECTRIC COMPANY'S  
OPPOSITION TO MOTION OF GOVERNOR EDMOND G. BROWN, JR.  
FOR THE DEFERRAL OF BOARD DECISION PENDING  
EVALUATION OF PGandE DESIGN ERRORS INVOLVING  
BLOCK AND RELIEF VALVES AND PRESSURIZER HEATERS



Governor Brown has requested a deferral of a Board Decision regarding PGandE's application for a full-power operating license citing PGandE's Board Notification of February 24, 1982, which indicated that the seismic response spectra at the elevation where the power operated relief valves (PORV) and their associated block valves are located may not have been conservative.

Preliminarily we note that in oral testimony presented at the hearings as well as the written prepared testimony, it was asserted by PGandE and the NRC staff witnesses that neither the pressurizer heaters nor the PORVs and their associated block valves were required to be classified as safety grade. However, we did state that all block valves and all but one of the three PORVs have been qualified to meet safety grade requirements.

With respect to questions raised concerning the appropriateness of the seismic analyses for these components, the only portion of the pressurizer heaters that is required to withstand the postulated Hosgri event is the heater penetration on the pressurizer. Admittedly, this penetration must be safety

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grade to maintain the pressure boundary. However, the design of the heater penetration was considered as part of the analysis of the pressurizer and its associated piping. The information furnished in the February 24, 1982, Board Notification and upon which this Motion is based does not relate to the spectra developed below the 140' level but only the appropriate spectra above this level. Hence, the Motion fails to present any information affecting the seismic qualification of these components. With respect to the seismic qualification of the PORVs and their associated block valves, the only requirement is that they be qualified to withstand the Hosgri event in order to maintain the pressurizer pressure boundary. Revised spectral inputs appropriate to the elevation at which the PORVs and associated block valves are located are currently being generated and will be utilized in a reanalysis of the valves. Based on this reanalysis, the valve piping and associated supports will be modified, if and as necessary, to maintain their safety grade qualification as testified at the Full-Power Hearings.

Since the qualification of the valves will be maintained and further that the pressurizer heater qualifications are not at issue, there is no compelling reason, based upon the February 24, 1982, Board Notification, for this Board to defer its decision on

those issues relating to block and relief valves and pressurizer heaters presented at the January Full-Power Hearings. Accordingly, PGandE urges that the Motion be denied.

Respectfully submitted,

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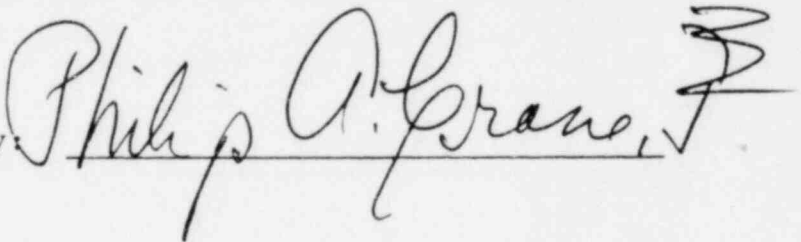
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Dated: April 7, 1982

By:

A handwritten signature in dark ink, appearing to read "Philip A. Crane, Jr.", is written over a horizontal line. The signature is stylized with a large, looped "P" and a long, sweeping underline that extends to the right.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
PACIFIC GAS AND ELECTRIC COMPANY	)	Docket No. 50-275
	)	Docket No. 50-323
Diablo Canyon Nuclear Power Plant,	)	
Units 1 and 2	)	(Full Power License Proceeding)
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CERTIFICATE OF SERVICE

The foregoing document(s) of Pacific Gas and Electric Company has (have) been served today on the following by deposit in the United States mail, properly stamped and addressed:

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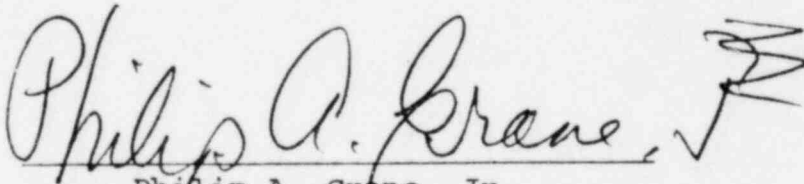
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