15578

UNITED STATES OF AMERICA

DOCKETED

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 94 AUG 15 P1:33

In the Matter of

Pacific Gas & Electric Co.

(Diablo Canyon Nuclear Power Plant, Units 1 and 2)

OFFICE OF SECRETARY DOCKETING & SERVICE BRANCH

Dockets No. 50-275, 50-323 (construction-OLA-2 permit recapture)

ERRATUM TO SAN LUIS OBISPO MOTHERS FOR PEACE'S MOTION TO REOPEN THE RECORD

Intervenors, the San Luis Obispo Mothers for Peace

("SLOMFP") hereby corrects the following error in its Renewed

Motion to Reopen the Record Regarding Pacific Gas and Electric

Company's Application for a License Amendment to Extend the Term

of the Operating License for the Diablo Canyon Nuclear Power

Plant (August 8, 1994):

On page 14, delete question marks after "computer code."

A corrected copy of page 14 is attached.

Respectfully submitted,

Diane Curran
Harmon, Curran, Gallagher &
Spielberg
6935 Laurol Avenue, Suite 204

Takoma Park, MD 20912

(301) 270-5518

August 12, 1994

correct." Id., Details at 6, emphasis added. However, he "noted that the calculations did not demonstrate that any significant margin existed in the 140 inch limit." Id. According to the Inspection Report, PG&E plans to "reassess" the 140 inch limit in the 1994 refueling outages. Id. Thus, it appears that even if the 140 inch limit is adequate, it is only barely adequate, providing no margin of safety to accommodate the potential uncertainties in macrofouling and heat exchanger capacity. Clearly, this would be incompatible with PG&E's commitment, in response to Generic Letter 89-13, to protect the operability of the ASW system with adequate design margins.

2. PG&E Misrepresented Results of Heat Exchanger Test

Inspection Report 93-36 found that PG&E had not reported accurately when it stated in DCL-91-286 that its computer model "predicted that the heat exchangers would remove the design basis heat load at design conditions." Id., Details at 5. PG&E later responded that the test failure was due to a combination of (a) an abnormal degree of fouling in the heat exchanger, and (b) the nature of the computer code used for the test. Inspection Report 94-08, Details at 4. According to PG&E, if PG&E had used a different, more commonly used, computer code, the test results would have been 101 percent of the design basis requirements. Id.

Inspection Report 94-08 and the NoV do not specifically address the adequacy of PG&E's analysis of the computer code. However, Inspection Report 94-08 found that there was an "apparent violation" in that PG&E had failed to provide "complete and

CERTIFICATE OF SERVICE

I certify that on August 12, 1994, copies of ERRATUM TO SAN LUIS OBISPO MOTHERS FOR PEACE'S RENWED MOTION TO REOPEN THE RECORD were served on the following parties by first-class mail:

Charles Bechhoefer
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry R. Kline
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washintgon, D.C. 20555

Frederick J. Shon Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

David Repka, Esq. Winston & Strawn 1400 L Street N.W. Washington, D.C. 20005

Ann P. Hodgdon, Esq. Office of General Counsel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Adjudicatory File U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Secretary of the Commission ATTN: Docketing and Service U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Office of Commission Appellate Adjudication U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Robert R. Wellington, Esq. Diablo Canyon Independent Safety Committee 857 Cass Street, Suite D Monterey, CA 93940

Edward O'Neill
Peter Arth, Jr.
Truman Burns
Robert Kinasian
Peter G. Fairchild, Esq.
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, CA 94102

Christopher Warner, Esq. Richard Locke, Esq. Pacific Gas & Electric Co. 77 Beale Street San Francisco, CA 94106

94 AUG 15 P1:33

DEFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

DOCKETED

Diane Curran