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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of	)	
PACIFIC GAS AND ELECTRIC COMPANY	)	Docket No. 50-275
	)	Docket No. 50-323
Diablo Canyon Nuclear Power Plant	)	(Reopened Hearing --
Units Nos. 1 and 2	)	Design Quality
	)	Assurance)

FIRST DOCUMENT PRODUCTION REQUEST  
BY PACIFIC GAS AND ELECTRIC COMPANY  
TO JOINT INTERVENORS AND  
GOVERNOR DEUKMEJIAN

Licensee PACIFIC GAS AND ELECTRIC COMPANY hereby requests JOINT INTERVENORS (jointly and severally) and GOVERNOR DEUKMEJIAN to produce the following documents pursuant to 10 C.F.R. § 2.741.

INSTRUCTIONS

A. The documents produced shall be produced at the 31st floor conference room of PG&E, 77 Beale Street, San Francisco, California on Friday, July 15, 1983, at 9:00 a.m. for inspection and/or copying.

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1           B. If any documents called for herein are  
2 withheld from production by reason of any assertion of  
3 privilege, identify each such document, giving the following  
4 information about it:

- 5           1. its title, if any;
- 6           2. its nature (e.g., letter, memorandum,  
7 chart, computer printout, ledger);
- 8           3. the date, if any, stated on the  
9 document, and the dates on which it was written,  
10 signed, and distributed;
- 11           4. the identity of its author or authors;
- 12           5. the identity of each person who signed  
13 it;
- 14           6. the identity of each person to whom it  
15 is addressed;
- 16           7. the identity of each person known to you  
17 or believed by you to have received a copy;
- 18           8. the identity of the present custodian of  
19 every copy known to you or believed by you to exist;
- 20           9. each and every ground upon which you  
21 base your claim of right to withhold the document from  
22 production, including all facts necessary to evaluate  
23 the merits of the claim.

24           C. "Documents" include printed material,  
25 writings, handwritten notes, photographs, xerox  
26 reproductions, and audio or video recordings. "Writings" and

1 "recordings" consist of letters, words, or numbers, or their  
2 equivalent, set down by handwriting, typewriting, printing,  
3 photostating, photographing, magnetic impulse, mechanical or  
4 electronic recording, or other form of data compilation, as  
5 defined in Rule 1001 of the Federal Rules of Evidence.

6 D. Documents produced shall be segregated  
7 according to each specific category of request listed below.

8 E. Documents produced shall be the most legible  
9 copy available. Illegible copies may be replaced by the  
10 best available copy upon the request of the propounding  
11 parties.

12 F. As used herein, the singular form of a noun  
13 or pronoun shall be considered to include within its meaning  
14 the plural form of the noun or pronoun so used, and vice  
15 versa; similarly, the use of the masculine form of a pronoun  
16 shall be considered to include also within its meaning the  
17 feminine form of the pronoun so used, and vice versa; and in  
18 a similar fashion any tense of any verb used herein shall be  
19 considered also to include within its meaning all other  
20 tenses of the verb so used.

21 G. All documents are to be produced which are,  
22 or have been, in your possession as of the date of receipt  
23 of this request through and including July 10, 1983.

24 H. "You" or "your" means the individual,  
25 association, or corporate party, their attorneys,

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1 consultants, investigators, agents, employees or other  
2 representatives of the named party and their attorneys.

3 I. "NRC" includes the Nuclear Regulatory  
4 Commission and the Nuclear Regulatory Commission staff.

5 DOCUMENTS REQUESTED

6 REQUEST # 1. All writings you have taken at all meetings  
7 between the NRC and/or PG&E and/or companies involved in the  
8 Independent Design Verification Program (IDVP) from  
9 October 1, 1981 to the present.

10 REQUEST # 2. All documents relating to Diablo Canyon design  
11 or design quality assurance prepared by PGandE, the IDVP, or  
12 the NRC, having comments, notes, or the like on them and any  
13 writings prepared by or for you discussing, commenting on or  
14 otherwise referring to those documents.

15 REQUEST # 3. All other documents relating to Diablo Canyon  
16 design or design quality assurance not produced in response  
17 to request # 2 which have been prepared or reviewed by or  
18 for you.

19 REQUEST # 4. All documents that contain calculations,  
20 analyses or computer programs performed by or for you  
21 regarding the design of Diablo Canyon structures, systems or  
22 components.

23 REQUEST # 5. All correspondence between you and the NRC or  
24 its contractors related in any way to design or design  
25 quality assurance at Diablo Canyon.

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1 REQUEST # 6. All correspondence or records of meetings or  
2 telephone conversations between Mr. Hubbard (or his  
3 associates) and Dr. Rosette (or his associates) related in  
4 any way to design of structures, systems, or components at  
5 Diablo Canyon.

6 REQUEST # 7. All notes, calculations, meeting minutes,  
7 computer outputs, drawings or other writings prepared by MHB  
8 Technical Associates or Dr. Rosette or any other of your  
9 technical consultants related in any way to design or design  
10 quality assurance at Diablo Canyon.

11 REQUEST # 8. All quality assurance manuals and procedures  
12 (including quality control procedures) governing the work of  
13 MHB Technical Associates since January 1, 1977, including  
14 all amendments or revisions thereto.

15 REQUEST # 9. Copies of all documentation showing adherence  
16 to MHB Technical Associates' quality assurance/quality  
17 control procedures for MHB Technical Associates' work  
18 relating to Diablo Canyon.

19 REQUEST # 10. All quality assurance manuals and procedures  
20 (including quality control procedures) governing the work of  
21 Dr. Rosette since January 1, 1982, including all amendments  
22 or revisions thereto.

23 REQUEST # 11. Copies of all documentation showing adherence  
24 by Dr. Rosette to quality assurance/quality control  
25 procedures for Dr. Rosette's work relating to Diablo Canyon.

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1 REQUEST # 12. All documents identified in your answers to  
2 PG&E's first set of interrogatories served the same date as  
3 this request.

4 REQUEST # 13. All exhibits you intend to mark for  
5 identification at the hearing of this matter.  
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7 Respectfully submitted,

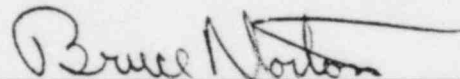
8 ROBERT OHLBACH  
9 PHILIP A. CRANE, JR.  
10 RICHARD F. LOCKE  
11 Pacific Gas and Electric Company  
12 P.O. Box 7442  
13 San Francisco, California 94120  
14 (415) 781-4211

12 ARTHUR C. GEHR  
13 Snell & Wilmer  
14 3100 Valley Center  
15 Phoenix, Arizona 85073  
16 (602) 257-7288

15 BRUCE NORTON  
16 Norton, Burke, Berry & French, P.C.  
17 P.O. Box 10569  
18 Phoenix, Arizona 85064  
19 (602) 955-2446

18 Attorneys for  
19 Pacific Gas and Electric Company  
20

21 By



22 Bruce Norton  
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24  
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DATED: June 10, 1983.