

ORIGINAL

DOCKETED
USNRC

RELATION CORRESPONDENCE

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
Diablo Canyon Nuclear Power Plant)	Docket No. 50-323
Units Nos. 1 and 2)	(Reopened Hearing --
)	Design Quality
)	Assurance)

LICENSEE PACIFIC GAS AND ELECTRIC COMPANY'S
FIRST SET OF INTERROGATORIES
TO JOINT INTERVENORS

Pursuant to 10 C.F.R. § 2.740b, Licensee PACIFIC
GAS AND ELECTRIC COMPANY hereby propounds the following
Interrogatories to the JOINT INTERVENORS.

INSTRUCTIONS

1. All information is to be divulged which is in
the possession of the individual, association, or corporate
party, their attorneys, consultants, investigators, agents,
employees, witnesses or other representatives of the named
party.

1 2. Where you have incomplete information that
2 precludes your fully answering an interrogatory, give such
3 information as you have and state what information you do
4 not have. If you are unable to give the information in the
5 form sought but have the information aggregated differently,
6 give the information in the form in which you have it and
7 explain the reason for the deviation.

8 3. When asked in the interrogatories below to
9 identify or to give the identity of a person, please give
10 the following information about him or her:

11 (a) full name;

12 (b) present job title, employer, and
13 telephone number.

14 4. When asked in the interrogatories below to
15 identify or to give the identity of a document or writing,
16 please give the following information about the document:

17 (a) its title, if any;

18 (b) its nature (e.g., letter, memorandum,
19 chart, computer printout, ledger);

20 (c) the date, if any, stated on the
21 document;

22 (d) the identity of each person who signed
23 it;

24 (e) the identity of each person to whom it
25 is addressed;

26 ///

1 5. Where an individual Interrogatory calls for
2 an answer which involves more than one part, each part of
3 the answer should be clearly set out so that it is
4 understandable.

5 6. These Interrogatories are intended as
6 continuing Interrogatories, requiring you to answer by
7 supplemental answer, setting forth any information within
8 the scope of the Interrogatories as may be acquired by you,
9 your agents, attorneys or representatives following your
10 original answers up to the time of hearing.

11 7. "You" or "your" means jointly and severally
12 each of the Joint Intervenors or any attorney, consultant,
13 investigator, agent, employee or other representative of the
14 collective or individual Joint Intervenors.

15 8. "Documents" include printed material, writ-
16 ings, handwritten notes, photographs, xerox reproductions,
17 and audio or video recordings. "Writings" and "recordings"
18 consist of letters, words, or numbers, or their equivalent,
19 set down by handwriting, typewriting, printing,
20 photostating, photographing, magnetic impulse, mechanical or
21 electronic recording, or other form of data compilation, as
22 defined in Rule 1001 of the Federal Rules of Evidence, 28
23 U.S.C.

24 INTERROGATORIES

25 1. As to each person employed by PG&E, Bechtel,
26 the PG&E/Bechtel "Project", or any of those entities'

1 subcontractors working on Diablo Canyon that you have had
2 communication with since November 21, 1981, regarding Diablo
3 Canyon, state:

4 (a) The name of each employee or representa-
5 tive with whom you have communicated. (This interrogatory
6 is not intended to cover any administrative communications
7 regarding announced meetings between the NRC Staff and/or
8 the IDVP and/or PG&E).

9 (b) The name of each person involved on your
10 behalf in each communication.

11 (c) The date of each such communication.

12 (d) How the communication was made, i.e.,
13 whether by telephone, written instrument, personal meeting,
14 or otherwise.

15 (e) Who initiated each such communication.

16 (f) The substance of information exchanged
17 during each such communication.

18 2. Identify each and every person you intend to
19 call as a witness during these proceedings. As to each such
20 witness, state:

21 (a) Name, occupation, occupational address
22 and telephone number.

23 (b) Whether the witness will render expert
24 testimony.

25 ///

26 ///

1 (c) If the witness will render expert
2 testimony, please list each specific subject matter about
3 which the witness will be expected to testify.

4 (d) If the witness will be called to give
5 expert testimony, please list the specific qualifications of
6 the witness that you contend would qualify the witness to
7 give opinion testimony on each specific subject matter about
8 which the witness will testify.

9 (e) List each and every professional
10 article, book, or the like, if any, the witness has authored
11 or co-authored concerning each specific subject matter set
12 forth in your answer to 2(c).

13 (f) Identify each and every document the
14 witness will rely on to reach any opinion testimony and
15 corollate each such document to each specific subject matter
16 on which the witness will render an opinion.

17 (g) As to each specific subject matter
18 identified in your answer to 2(c), identify by docket number
19 and case name each Nuclear Regulatory Commission licensing
20 proceeding where the witness has previously given expert
21 testimony concerning each specific subject matter.

22 (h) As to each proceeding identified in your
23 answer to 2(g), please state:

24 (i) The date(s) the expert testimony
25 was given.

26 ///

1 (ii) Whether you have a copy of the
2 testimony given.

3 (iii) Whether you have a copy of the
4 transcript covering any or all of the
5 witness' examination and/or cross-examination
6 for each such proceeding.

7 (iv) Whether you have a copy of the
8 notes which the witness made in preparation
9 for, or utilized during, the witness'
10 examination or cross-examination in each such
11 proceeding.

12 (i) As to each specific subject matter
13 identified in your answer to 2(c), identify by docket number
14 and court name each legal proceeding where the witness has
15 previously given expert testimony concerning each specific
16 subject matter.

17 (j) As to each proceeding identified in your
18 answer to 2(i), please state:

19 (i) The date(s) the expert testimony
20 was given.

21 (ii) Whether you have a copy of the
22 transcript covering any or all of the
23 witness' examination and/or cross-examination
24 for each such proceeding.

25 (iii) Whether you have a copy of the
26 notes which the witness made in preparation

1 for, or utilized during, the witness'
2 examination or cross-examination in each such
3 proceeding.

4 (k) As to each specific subject matter
5 identified in your answer to 2(c), identify committees and
6 organizations where the witness has previously given
7 testimony concerning each specific subject matter.

8 (l) As to each committee or organization
9 identified in 2(k), please state:

10 (i) The date(s) the testimony was
11 given.

12 (ii) Whether you have a copy of the
13 testimony given.

14 (iii) Whether you have a copy of the
15 transcript covering any or all of the
16 witness' examination and/or cross-examination
17 for each such proceeding.

18 (iv) Whether you have a copy of the
19 notes which the witness made in preparation
20 for, or utilized during, the witness'
21 testimony and/or examination and/or
22 cross-examination in each such proceeding.

23 3. Identify all examinations, reviews, studies,
24 analyses, or the like, conducted, initiated, or anticipated
25 to be conducted by or for you since September 1981 relating
26 in whole or part to design quality assurance or design

1 activities at Diablo Canyon. As to each such study,
2 analysis, or the like, state:

3 (a) The date of preparation or anticipated
4 preparation.

5 (b) The name of each and every person who
6 has or will contribute to the effort.

7 (c) The contribution of each person
8 identified in your answer to 3(b).

9 4. As to the terms "important-to-safety" and
10 "safety-related", please:

11 (a) Give your definition for each term for
12 the following periods:

13 (i) January 1, 1968 to November 20,
14 1981.

15 (ii) November 21, 1981 to the present.

16 (b) State the bases for each definition
17 given in your answers to 4(a)(i) and 4(a)(ii).

18 5. Identify each and every structure at Diablo
19 Canyon that you believe to be "important-to-safety", but
20 which is not classified as design Class I. As to each such
21 structure identified, state:

22 (a) The bases for your opinion that the
23 structure should be considered "important-to-safety".

24 (b) Each regulation which, in your opinion,
25 requires each such structure to be classified as
26 "important-to-safety".

1 (c) The date upon which each such regulation
2 required each such structure to be so classified.

3 6. Identify specifically each and every system
4 at Diablo Canyon that you believe to be
5 "important-to-safety", but which is not classified as design
6 Class I. As to each such system identified, state:

7 (a) The bases for your opinion that each
8 such system should be considered "important-to-safety".

9 (b) Each regulation which, in your opinion,
10 requires each such system to be classified as
11 "important-to-safety".

12 (c) The date upon which each such regulation
13 required each such system to be so classified.

14 7. Identify specifically each and every
15 component at Diablo Canyon that you believe to be
16 "important-to-safety", but which is not classified as design
17 Class I. As to each such component identified, state:

18 (a) The bases for your opinion that each
19 such component should be considered "important-to-safety".

20 (b) Each regulation which, in your opinion,
21 requires each such component to be classified as
22 "important-to-safety".

23 (c) The date upon which each such regulation
24 required each such component to be so classified.

25 ///

26 ///

1 8. Identify the person(s) upon whom you rely for
2 the answers given to 5, 6 and 7 above and for each such
3 person(s), state:

4 (a) The person's name.

5 (b) The specific experience and qualifica-
6 tions of the person which qualify the person to make the
7 analyses necessary to answer interrogatories 5 (structures),
8 6 (systems) and 7 (components).

9 9. Identify each and every design quality assur-
10 ance/control program you have written or been responsible
11 for. As to each such quality assurance program, state:

12 (a) The date of initial preparation.

13 (b) The name of the company or entity who
14 used or is using the program.

15 (c) Whether you wrote all or portions of the
16 program and, if portions, which portions.

17 (d) Whether you were responsible for execut-
18 ing all or portions of the program and, if portions, which
19 portions.

20 (e) Whether the program was ever audited,
21 and, if so, when and by whom.

22 (f) The present location of all audits
23 identified in your answer to 9(e).

24 10. Identify each and every other quality assur-
25 ance/control program you have written or been responsible
26 for. As to each such quality assurance program, state:

1 (a) The date of initial preparation.

2 (b) The name of the company or entity who
3 used or is using the program.

4 (c) Whether you wrote all or portions of the
5 program and, if portions, which portions.

6 (d) Whether you were responsible for exe-
7 cuting all or portions of the program and, if portions,
8 which portions.

9 (e) Whether the program was ever audited,
10 and, if so, when and by whom.

11 (f) The present location of all audits
12 identified in your answer to 10(e).

13 11. Identify each and every design quality
14 assurance/quality control procedure you have written or been
15 responsible for. As to each such procedure, state:

16 (a) The date of initial preparation.

17 (b) The name of the company or entity who
18 used or is using the procedure.

19 (c) Whether you wrote all or portions of the
20 procedure and, if portions, which portions.

21 (d) Whether you were responsible for
22 executing all or portions of the procedure and, if portions,
23 which portions.

24 (e) Whether the procedure was ever audited,
25 and, if so, when and by whom.

26 ///

1 (f) The present location of all audits
2 identified in your response to 11(e).

3 12. Identify each and every other quality assur-
4 ance procedure/quality control procedure you have written or
5 been responsible for. As to each such procedure, state:

6 (a) The date of initial preparation.

7 (b) The name of the company or entity who
8 used or is using the procedure.

9 (c) Whether you wrote all or portions of the
10 procedure and, if portions, which portions.

11 (d) Whether you were responsible for
12 executing all or portions of the procedures and, if
13 portions, which portions.

14 (e) Whether the procedure was ever audited,
15 and, if so, when and by whom.

16 (f) The present location of all audits
17 identified in your response to 12(e).

18 13. Mr. Hubbard, in his affidavits and/or his
19 declaration uses the following terms:

- 20 (a) "safety-significance"
- 21 (b) "errors"
- 22 (c) "deficiencies"
- 23 (d) "safety implications"
- 24 (e) "design QA"
- 25 (f) "safety hazard"
- 26 (g) "quality control"
- (h) "root cause"
- (i) "basic cause"
- (j) "QA breakdown"
- (k) "extreme likelihood"
- (l) "major errors"
- (m) "rigorous and thorough design
verification program"

- (n) "design product"
- (o) "minor QA breakdown"
- (p) "QA finding"
- (q) "QA observation"

As to each term, please:

- (a) Give your definition of the term.
- (b) Identify the regulation or other source upon which you base your definition.
- (c) Give your explanation of the difference between "safety-significance" and the terms "important-to-safety" and "safety-related".
- (d) Give your explanation of the difference between "major errors" and "errors".
- (e) Give your explanation of the difference between "deficiencies" and "errors".
- (f) Give your explanation of the difference between a "QA breakdown" and a "major QA breakdown".
- (g) Give your explanation of the difference between a "QA breakdown" and a "QA finding".
- (h) Give your explanation of the difference between a "QA breakdown" and a "QA observation".

14. List each ITR, with revision number, that you have reviewed to date. As to each ITR, state specifically:

- (a) Each fact stated therein with which you disagree.
- (b) The specific page(s) of each ITR where the fact(s) set forth in your answer to 14(a) is located.

1 (c) Each conclusion or opinion stated
2 therein with which you disagree.

3 (d) The specific page(s) of each ITR where
4 the conclusion(s) or opinion(s) set forth in your answer to
5 14(c) is located.

6 (e) The specific bases for your disagreement
7 with each such fact, conclusion or opinion.

8 15. With respect to the PG&E Phase I Final
9 Report, identify:

10 (a) Each fact stated therein with which you
11 disagree.

12 (b) The specific page(s) of the Report where
13 the fact(s) set forth in your answer to 15(a) is located.

14 (c) Each conclusion or opinion stated
15 therein with which you disagree.

16 (d) The specific page(s) of the Report where
17 the conclusion(s) or opinion(s) set forth in your answer to
18 15(c) is located.

19 (e) The specific bases for your disagreement
20 with each such fact, conclusion or opinion.

21 16. State specifically all direct personal
22 knowledge that you have regarding:

23 (a) The design of Diablo Canyon.

24 (b) The design quality assurance programs
25 for Diablo Canyon.

26 ///

1 (c) How such direct personal knowledge was
2 acquired.

3 17. Mr. Hubbard has alleged in an affidavit that
4 Diablo Canyon design errors "reflected significant QA
5 breakdowns", and that "those breakdowns led the Commission
6 to suspend the low power license".

7 (a) Explain how Mr. Hubbard arrived at this
8 conclusion.

9 (b) Identify what access Mr. Hubbard had to
10 the Commission's decision-making process.

11 (c) Identify specifically each and every
12 document or communication you relied on that describes the
13 reason the Commission reached its decision to suspend the
14 low power license.

15 18. In paragraph 9 of the Hubbard affidavit
16 attached to Joint Intervenor's Motion to Reopen of June 7,
17 1982, Mr. Hubbard lists categories of items that he
18 reviewed. Identify specifically:

19 (a) The industry QA/QC standards prior to
20 1970 that Mr. Hubbard reviewed.

21 (b) The "regulatory developments" examined.

22 (c) All documents examined by Mr. Hubbard in
23 his examination of the NRC's implementation of QA/QC
24 regulations.

25 19. Identify specifically any and all PG&E, NRC,
26 and/or ACRS documents that you allege stand for the propo-

1 sition that PG&E and/or the NRC and/or the ACRS relied upon
2 superior QA/QC at Diablo Canyon to compensate for reduced
3 conservatism.

4 20. Do you admit that superior QA/QC at Diablo
5 Canyon would compensate for reduced conservatism?

6 _____ Explain the bases for your answer to this
7 interrogatory:

8 21. In paragraph 12 of the Hubbard affidavit
9 identified in Interrogatory No. 18, the term "basis for
10 confidence" is used. Define the term and explain, in
11 context, what constitutes a "basis for confidence".

12 22. In paragraph 13 of the Hubbard affidavit
13 identified in Interrogatory No. 18, Mr. Hubbard alleges a
14 number of "errors and discrepancies" at Diablo Canyon and
15 states that they involved a failure by PG&E to properly
16 implement the QA requirements of Appendix B. Identify each
17 such alleged error and discrepancy. As to each alleged
18 error and discrepancy:

19 (a) State specifically the significance of
20 each alleged error or discrepancy.

21 (b) State specifically how each alleged
22 error or discrepancy was caused by PG&E's alleged failure to
23 properly implement the QA requirements of Appendix B.

24 23. Identify specifically each document upon
25 which you rely as support for your contentions or positions
26 as stated in your answers to these interrogatories. As to

1 each such document, identify the precise portion relied upon
2 as to each such contention or position.

3 24. For each answer to these interrogatories, and
4 all subparts thereto, identify each person who participated
5 in the preparation of your answers pursuant to 10 C.F.R.
6 § 2.740b(b).

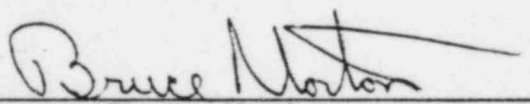
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8 Respectfully submitted,

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21
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24 DATED: June 10, 1983.
25
26

ORIGINAL
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

DOCKETED
JUN 14 11:08
Docket No. 50-275
Docket No. 50-323

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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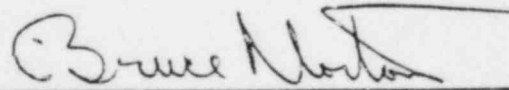
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