

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)
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PACIFIC GAS AND ELECTRIC COMPANY)
)
)

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

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

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

Governor George Deukmejian and Joint Intervenors¹/
hereby request that applicant Pacific Gas and Electric Company
(PG&E) produce the documents identified below, pursuant to 10
C.F.R. section 2.741.

INSTRUCTIONS

A. The documents described below, following the title
"DOCUMENTS TO BE PRODUCED," shall be produced at the offices of
PG&E, 77 Beale Street, San Francisco, California 94106, on
June 10, 1983, at 9:00 a.m., where they shall be available for
copying by representatives of the Governor and the Joint
Intervenors. Counsel hereby indicate their willingness to

1/ Joint Intervenors are San Luis Obispo Mothers for
Peace, Scenic Shoreline Preservation Conference, Inc., Ecology
Action Club, Sandra Silver, Gordon Silver, Elizabeth Apfelberg,
and John J. Forster.

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adjust the time and place of production for the mutual convenience of the parties. It is the desire of the Governor and Joint Intervenors that if some or all of the documents requested here can be made available earlier than the specified date, their production be advanced to the earliest practicable date.

B. The documents shall be made available for a period sufficient to permit their copying. Upon completion of that period, the documents will be returned.

C. Documents identical to another copy of the same document may be omitted from production where the original has already been provided.

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

1. its title, if any;
2. its nature (e.g., letter, memorandum, chart, computer printout, ledger);
3. the date, if any, stated on the document, and the dates on which it was written, signed, and distributed;
4. the identity of its author or authors;
5. the identity of each person who signed it;
6. the identity of each person to whom it is addressed;
7. the identity of each person known to you or believed by you to have received a copy;

8. the identity of the present custodian of every copy known to you or believed by you to exist;

9. each and every ground upon which you base your claim of right to withhold the document from production, including all facts necessary to evaluate the merits of the claim.

E. Documents produced shall be segregated according to each specific category of request listed below.

F. Documents produced shall be the most legible copy available. Illegible copies may be replaced by the best available copy upon the request of the propounding parties.

G. This request calls for production of the described documents from the files of PG&E, its agents, employees, contractors, subcontractors, affiliates, departments, divisions, units, subunits, and attorneys, and from the files of the Diablo Canyon Project and the Independent Design Verification Project.

H. As used herein, the singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun so used, and vice versa; similarly, the use of the masculine form of a pronoun shall be considered to include also within its meaning the feminine form of the pronoun so used, and vice versa; and in a similar fashion any tense of any verb used herein shall be considered also to include within its meaning all other tenses of the verb so used.

I. The use of the word "or" is the inclusive form of

that conjunction, implicitly including within its meaning the word "and."

J. Should you have any questions regarding the meaning of any term or interpretation of any interrogatory, you are encouraged to consult with counsel regarding such questions.

DEFINITIONS

(1) "Bechtel" means the Bechtel Power Corporation.

(2) "Diablo Canyon" means units 1 and 2 of the Diablo Canyon Nuclear Power Plant, including all structures at the site.

(3) "Diablo Canyon Project" (DCP) means PG&E, Bechtel, all joint projects of PG&E and Bechtel concerning Diablo Canyon, and all contractors, subcontractors, consultants, and agents of the foregoing, excluding the IDVP.

(4) "Document" means any and all things that constitute "writings" pursuant to rule 1001 of the Federal Rules of Evidence.

(5) "Independent Design Verification Program" (IDVP) means the program established by the November 19, 1981, order of the Nuclear Regulatory Commission (NRC), the November 19, 1981, letter from Harold Denton to Malcolm Furbush, and implementing directives of the NRC staff, as that program may have been modified since that date.

(6) "Interim Technical Report" (ITR) means a report in the series of Interim Technical Reports by the IDVP.

(7) "Person" includes natural persons, corporations, partnerships, other business entities, and public agencies.

- (8) "PG&E" means the Pacific Gas and Electric Company.
- (9) "You" and "your" refer to PG&E.

DOCUMENTS TO BE PRODUCED

1. The PG&E Quality Assurance Manual, including a copy of each page superceded since issuance of the construction permit for Diablo Canyon unit 1.
2. The PG&E Engineering Department Engineering Manual, including a copy of each page superceded since issuance of the construction permit for Diablo Canyon unit 1.
3. The Diablo Canyon Project Engineering Instructions, including a copy of each page superceded since formation of the DCP.
4. The Bechtel Nuclear Quality Assurance Manual, including a copy of each page superceded since formation of the DCP.
5. The Bechtel Quality Assurance Department Procedures Manual, including a copy of each page superceded since formation of the DCP.
6. The quality assurance manual of each and every subcontractor to the IDVP.
7. All documents not produced in response to the preceding requests, reflecting the policies, procedures, and instructions that define PG&E's quality assurance program for design activities at Diablo Canyon in compliance with appendix B to part 50 of 10 C.F.R. and General Design Criterion 1 to appendix A to part 50 of 10 C.F.R.
8. All documents containing the results of audits or

surveillance conducted in compliance with General Design Criterion 1 of appendix A to part 50 of 10 C.F.R. or in compliance with Criterion 18 of appendix B to part 50 of 10 C.F.R., insofar as those audits or surveillance pertains to design quality assurance.

9. All documents prepared for PG&E management by or for the PG&E Quality Assurance Department that discuss the effectiveness of the design quality assurance program.

10. The document or documents identifying the structures, systems, and components covered by your quality assurance program for safety-related items pursuant to Criterion 2 of appendix B to part 50 of 10 C.F.R.

11. The document or documents identifying the structures, systems, and components covered by your quality assurance program for important-to-safety items pursuant to Criterion 2 of appendix B to part 50 of 10 C.F.R.

12. Each and every Design Criteria Memorandum for Diablo Canyon and each and every revision thereof.

13. Each and every draft of the DCP Phase I Final Report and each and every draft of any section of the DCP Phase I Final Report.

14. Each and every draft of the DCP Phase II Final Report and each and every draft of any section of the DCP Phase II Final Report.

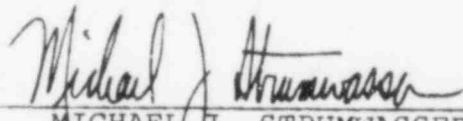
15. Each and every draft of each and every ITR, including revisions, excluding ITR 36 and ITR 38, and each and every draft of any section of any such ITR or revision.

16. Each and every document discussing or commenting on any ITR or draft of any ITR, or any portion thereof, excluding ITR 36 and ITR 38.

DATED: May 6, 1983.

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By

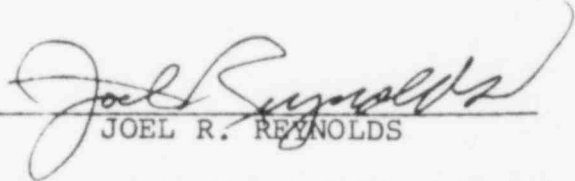

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