

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

ATOMIC SAFETY AND LICENSING APPEAL BOARD ~~93~~ OCT -3 P12:50

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)

PACIFIC GAS AND ELECTRIC COMPANY)

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

Docket Nos. 50-275 OL
50-323 OL

GOVERNOR DEUKMEJIAN AND JOINT
INTERVENORS' ADDITIONAL CONTENTIONS
ON DESIGN QUALITY ASSURANCE

Pursuant to the Atomic Safety and Licensing Appeal Board's September 7, 1983 order, Governor Deukmejian and the Joint Intervenors hereby submit the following additional contentions on design quality assurance arising out of materials which have been released after the last opportunity to tender contentions:

3. (o) The ITP has not demonstrated, and the IDVP has not verified, that the DCP modeling of the seismic response of the fuel handling building is proper, in that the DCP has not adequately justified the use of the translational and torsional response of the auxiliary building as input to the fuel handling building nor has it demonstrated the validity of the dynamic degrees of freedom selected. (ITR 57.)

1.

(p) The ITP has not demonstrated, and the IDVP has not verified, that the DCP seismic model of the slabs in the auxiliary building is proper, in relation to the use of vertical and rotational springs to model the columns, and the motions used as input at the ends of the springs not connected to the slabs. In addition, in the study of the diaphragms, the ITP has not adequately accounted for the inplane flexibility of these slabs, and has not adequately demonstrated that stresses are within allowable limits at all elevations. (ITR 55.)

(q) The ITP has not demonstrated and the IDVP has not verified, that the soils analysis for the buried diesel fuel oil tanks is proper in that the values of the exponent shown in figure 14 of ITR 68 have not been demonstrated to be appropriate and the variation of shear velocity with depth is not properly justified. (ITR 68.)

(r) The ITP has not demonstrated and the IDVP has not verified that the soils analysis for the auxiliary saltwater piping and circulating water intake conduits is proper in that the selection of the modulus versus strain curve utilized is not justified. (ITR 68.)

(s) The ITP has not demonstrated and the IDVP has not verified that the seismic analysis of the turbine

building is proper in that bolt bearing capacities were taken from an inappropriate source. (ITR 56.)

(t) The ITP has not demonstrated and the IDVP has not verified that the seismic analysis of the turbine building is proper in that the use of four different models for the vertical analysis has not been justified. (ITR 56.)

9. Contrary to General Design Criteria 44 (GDC-44) of Appendix A to 10 C.F.R. Part 50, PG&E has failed to provide adequate assurance of component cooling water system (CCWS) heat removal safety function capacity in that the maximum ocean water temperature of 64° F. is not conservative because it has already been exceeded in 1983. Furthermore a technical specification limitation which permits plant operation at reduced power levels in lieu of enlarging the capacity of the CCWS does not provide an equivalent level of

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safety as compliance with the requirements of GDC-44 (SSER 16 (Aug. 1983) and September 1983 ocean water temperature readings).

DATED: SEPTEMBER 29, 1983.

Respectfully submitted,

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