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 Nos. 50-275 50-323

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

## AFFIDAVIT OF WILLIAM H. WHITE

STATE OF CALIFORNIA

SS.

ţ

COUNTY OF SAN FRANCISCO

I, William H. White, being duly sworn, depose and say:

B407300440 B40727 PDR ADOCK 05000275 PDR ADOCK 05000275 G

I am currently the Assistant Project Engineer, Seismic, for the Diablo Canyon Project. My credentials have previously been submitted to the Atomic Safety and Licensing Appeal Board in these proceedings.

The Brune affidavit cites several earthquakes and corresponding response spectra which exceed the Diablo Canyon Hosgri spectra over certain frequencies. This Board concluded that the Newmark spectra virtually enveloped the Pacoima response spectra and that calculated responses would not be affected by spikes of short duration. (13 NRC 903, 939) The Board also recognized that in the near field it is a physically valid and acceptable procedure to use an anchor point lower than the peak acceleration for design purposes. (Id. at 940 <u>et seq</u>.) Similarly, the response spectra of the Coyote Lake (1979), Victoria (1980), Imperial Valley (1979) and Morgan Hill (1984) earthquakes exhibit slight excursions which are structually insignificant. Accordingly, if these spectra area appropriately modified to consider the effective acceleration concepts previously recognized by this

-2-

Board, (13 NRC 940-943) the Diablo Canyon Hosgri design bases would remain controlling.

DATED: July 27, 1984

\* \*

William H. White

Subscribed and sworn to before me this 27th day of July. 1984

C.T. Nesl-Madison

C. T. Neal-Madison Notary Public in and for the City and County of San Francisco, State of California. My commission expires December 27, 1985



## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of

Units 1 and 2

1 1 H

PACIFIC GAS AND ELECTRIC COMPANY )

Diablo Canyon Nuclear Power Plant,

Docket No. 50-275 Docket No. 50-323

'84 JUL 30 AID:08

## 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:

Judge John F. Wolf Chairman Atomic Safety and Licensing Board US Nuclear Regulatory Commission Washington DC 20555

Judge Glenn O. Bright Atomic Safety and Licensing Board US Nuclear Regulatory Commission Washington DC 20555

Judge Jerry R. KlineCenter for Law in the Public InAtomic Safety and Licensing Board10951 W. Pico Blvd. - Suite 300US Nuclear Regulatory CommissionLos Angeles CA 90064Washington DC 20555Pico Blvd. - Suite 300

Mrs. Elizabeth Apfelberg c/o Betsy Umhoffer 1493 Southwood San Luis Obispo CA 93401

Janice E. Kerr, Esq. Public Utilities Commission State of California 5246 State Building 350 McAllister Street San Francisco CA 94102

Mrs. Raye Fleming 1920 Mattie Road Shell Beach CA 93449

Mr. Frederick Eissler Scenic Shoreline Preservation Conference, Inc. 4623 More Mesa Drive Santa Barbara CA 93105 Mrs. Sandra A. Silver 1760 Alisal Street San Luis Obispo CA 93401

Mr. Gordon Silver 1760 Alisal Street San Luis Obispo CA 93401

John Phillips, Esq. Joel Reynolds, Esq. Eric Havian Center for Law in the Public Interest 10951 W. Pico Blvd. - Suite 300 Los Angeles CA 90064

David F. Fleischaker, Esq. P. O. Box 1178 Oklahoma City OK 73101

Arthur C. Gehr, Esg. Snell & Wilmer 3100 Valley Bank Center Phoenix AZ 85073

Bruce Norton, Esq. Norton, Burke, Berry & French, P.C. P. O. Box 10569 Phoenix AZ 85064

Chairman Atomic Safety and Licensing Board Panel US Nuclear Regulatory Commission Washington DC 20555 Chairman Atomic Safety and Licensing Appeal Panel US Nuclear Regulatory Commission Washington DC 20555

Secretary US Nuclear Regulatory Commission Washington DC 20555

Attn: Docketing and Service Section

Lawrence J. Chandler, Esq. Henry J. McGurren US Nuclear Regulatory Commission Office of Executive Legal Director Washington DC 20555

Mr. Richard B. Hubbard MHB Technical Associates 1723 Hamilton Avenue Suite K San Jose CA 95125

Mr. Carl Neiberger <u>Telegram</u> <u>Tribune</u> P. O. Box 112 San Luis Obispo CA 93402

Michael J. Strumwasser, Esq. Susan L. Durbin, Esq. Peter H. Kaufman, Esq. 3580 Wilshire Blvd. Suite 800 Los Angeles CA 90010

Maurice Axelrad, Esq. Newman & Holtzinger, P.C. 1025 Connecticut Ave. NW Washington DC 20036

These copies delivered by courier.

Date: July 27, 1984

Judge Thomas S. Moore Chairman Atomic Safety and Licensing Appeal Board US Nuclear Regulatory Commission Washington DC 20555

Judge W. Reed Johnson Atomic Safety and Licensing Appeal Board US Nuclear Regulatory Commission Washington DC 20555

Judge John E. Buck Atomic Safety and Licensing Appeal Board US Nuclear Regulatory Commission Washington DC 20555

Commissioner Nunzio J. Palladino Chairman US Nuclear Regulatory Commission 1717 H Street NW Washington DC 20555

Commissioner Frederick M. Bernthal US Nuclear Regulatory Commission 1717 H Street NW Washington DC 20555

Commissioner Lando W. Zech, Jr. US Nuclear Regulatory Commission 1717 H Street NW Washington DC 20555

Commissioner James K. Asselstine US Nuclear Regulatory Commission 1717 H Street NW Washington DC 20555

Commissioner Thomas M. Roberts US Nuclear Regulatory Commission 1717 H Street NW Washington DC 20555

Bruce Norton

100