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November 18, 1982

Spence W. Perry, Esq.
 Acting Assistant General Counsel
 Federal Emergency Management Agency
 500 C Street, N.W.
 Washington, DC 20001

In the Matter of
 Pacific Gas and Electric Company
 (Diablo Canyon Nuclear Power Plant, Units 1 and 2)
 Docket Nos. 50-275 OL and 50-323 OL

Dear Spence:

Enclosed are copies of the briefs in support of exceptions that have been filed by Governor Brown and Joint Intervenors in the Diablo Canyon proceeding. Please review both briefs and provide me with your comments, if any, no later than December 6, 1982.

For your information, I have also enclosed a copy of the NRC Staff brief for the Diablo Canyon proceeding which was filed on November 12, 1982.

Sincerely,

8702130405 870203
 PDR FOIA
 HOLMES86-151 PDR

Donald F. Hassell
 Counsel for NRC Staff

Enclosures: As stated

DFC : OELB	: OELD	: OELD ESC	:	:	:
NAME : DFHassell	: SA Treby	: EChristenbury	:	:	:
DATE : 11/18/82	: 11/18/82	: 11/18/82	:	:	:

5/19

to Luchet (w.o. dtd) ?

11/30

no BU

VIA

R. R. Frey
Nuclear Power Corporation
Treatment Street
22nd Floor, Section 17
San Francisco, CA 94105

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**SUPPORTING INFORMATION FOR OPEN ITEM REPORTS
TELETYPE ENGINEERING SERVICES
DIABLO CANYON NUCLEAR POWER PLANT - UNIT 1**

The documentation listed below are transmitted in response to your request DCVP - SWC - 232. It should be noted that calculations performed by SWC as part of the IDVP are not necessarily calculations of the detail usually performed to establish specific design parameters. In many cases the calculations are "go-nogo" calculations to establish whether DCNPP-1 licensing commitments were satisfied. As such, simplifying assumptions may have been used or calculations may not have been taken to completion to establish SWC conclusions as to whether DCNPP-1 licensing commitments were satisfied.

(Continued on page 2 of 2).

Very truly yours,

John E. Krechting
J. Krechting
Project Engineer, Diablo Canyon Nuclear Power Plant

- Copies to:
- WCooper
 - ASchierling
 - HBrown
 - DFleischaker
 - JReynolds
 - ENorton
 - AGGent

no BU

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<u>EOI Reference</u>	<u>EOI Package No.</u>	<u>Page No.</u>
8009	P-1-5	5-13 to 5-14 5-15 to 5-16
8010	P-1-16	16-1 to 16-25
8015	P-1-25	25-1 to 25-21
8031	P-1-31	31-H-1 to 31-H-10

TELEDYNE
ENGINEERING SERVICES

130 SECOND AVENUE

WALTHAM, MASSACHUSETTS 02254

TEL: 617-252-3000 FAX: 617-252-3000

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October 29, 1982
5511-185

Mr. H. H. Brown, Esq.
Kirkpatrick, Lockhart, Hill, Christopher, & Phillips
1900 M Street, N.W.
Washington, D.C. 20036

Subject: Response to H. H. Brown Letter of October 12, 1982

Dear Mr. Brown:

Dr. Cooper, as Project Manager for the DCNPP-IDVP, has reviewed your request and asked that I respond as follows.

The referenced letter requests:

1. An explanation of the process and chronology of events by which Teledyne discussed with PG&E, Bechtel, Stone and Webster, and/or others the subject of a Construction Quality Assurance (CQA) review of Diablo Canyon.
2. An explanation of the process and nature of negotiations and discussions with PG&E, Bechtel, and/or others pursuant to which Teledyne undertook to perform such review.
3. Copies of any correspondence Teledyne has had with PG&E, Bechtel, Stone and Webster, and/or others concerning the foregoing, including particularly any materials related to the scope and content of the Construction QA Program.
4. Copies of Teledyne's contracts and subcontracts with PG&E and/or others for the Construction QA program.
5. An explanation of the relationship between Teledyne and Stone and Webster regarding the CQA program, and copies of any correspondence and agreements with Stone and Webster.

Our responses are intended to be clarifications as intended by Mr. Denton's letter of September 29, 1982, to the extent that your requests pertain to information in the public domain. Mr. Denton's letter exempts communications solely with respect to financial and administrative aspects. In the main, the responses are based upon our public statements

made on September 1, October 7, and October 19-20, 1982 and the public correspondence between the various parties. Before responding to the specific questions, a clarification with respect to the second paragraph of the reference letter may be helpful. That paragraph appears to place a different connotation on the term "adjunct", as in the title "Adjunct Program for Evaluation of Construction Quality Assurance", than was intended. The quoted Webster definition of adjunct contained on the first text page of the CQA Program Plan is: "Something joined or added to another thing but not essentially a part of it." The CQA program is the "something", the Phase II IDVP is the "another thing", and the first is not "essentially a part" of the second because the CQA program is not required by the NRC Letter to which Phase II responds. Instead, the CQA has been volunteered by PG&E and the IDVP has "joined or added" the volunteered technical work to Phase II for purposes of program management. CQA is an adjunct, not a collateral program.

The following chronological presentation is intended to be responsive to the first two of your requests, and covers the third because the public correspondence identified is already available to you.

1. TES' first knowledge of CQA was a telecon from Mr. Maneatis to Dr. Cooper the evening of August 30, 1982. Mr. Maneatis stated that PG&E was considering volunteering the CQA program in the meeting with NRC to be held on September 1, 1982 and requested that Dr. Cooper visit with Mr. Maneatis on his arrival in San Francisco on the afternoon of August 31, 1982. There was also a brief discussion of the details discussed in the next item.
2. Dr. Cooper visited with Mr. Maneatis on the afternoon of August 31, 1982. Mr. Maneatis gave Dr. Cooper a copy of the Region V memo to Mr. Denton dated March 29, 1982 identifying the Region V concern, stated that the decision had been made to volunteer a program in response to item 3 of the Region V memo, and stated the PG&E desire to place this program under IDVP Management. Dr. Cooper responded that the IDVP would accept the management of the CQA program if PG&E would fully define the scope they were volunteering, if the work could be conducted by Stone and Webster Engineering Corporation (SMEC) as an active and qualified IDVP participant, if TES and SMC found nothing disagreeable about the proposed scope, and if the CQA work could be conducted in accordance with the IDVP program management plan.
3. On the basis of their decision and the IDVP willingness to manage the program, the CQA program was announced by Mr. Maneatis at the meeting with the NRC on September 1, 1982 (Tr. p. 10-11).
4. PG&E (Crane) advised NRC (Eisenhut) by letter dated September 7, 1982 that PG&E was proceeding to implement the proposal that a CQA program be conducted as part of Phase II of the IDVP.

5. The next significant result from this process was TES submittal (letter 5511-149 dated September 25, 1982) for PG&E approval and NRC information and comments of a Program Plan for Construction Quality Assurance. The process used to develop this submittal followed that implied by item 2:
 - a. DCP telecopied a Preliminary Program Description to TES on September 2, 1982. TES reviewed this document, found it to be reasonable, and hand carried a copy to SWEC for their review in preparation for a meeting the following day.
 - b. On the morning of September 8, 1982 Messrs. Manecatis and Friend visited TES for the purpose of discussing the CQA concept, and other administrative aspects. The term "adjunct" was developed during this discussion to distinguish the CQA aspects from those covered by the NRC Phase II letter. On that afternoon, Messrs. Manecatis, Friend, Noriega and Cooper visited SWEC (Messrs. Wild, Kelley, Warren, Richardson, and Sestak) to review the proposed scope and integration into the IDVP program. Based upon this meeting, the IDVP agreed to accept the assignment, to prepare a program description adopting the PG&E-proposed scope, and to integrate the CQA with the Phase II program management plan.
 - c. The CQA Program plan was developed in parallel by TES and by SWEC. The TES contribution primarily related to the management aspects of the CQA plan and became Sections 1.0, 2.0 (partial), and 4.0 - 7.0 of the plan. The SWEC contribution was developed in discussions with TES and with DCP (Sec. 5a), was provided to DCP on September 17, 1982 (TES letter 5511-131) as a Program Description which became Sections 2.0 (partial) and 3.0 of the CQA plan. In integrating the two documents, word changes were made by TES in the SWEC contribution concerning the treatment of Potential Findings to assure consistency with IDVP procedures.
6. PG&E approved the TES proposal with comments by letter of October 7, 1982, following verbal approval on October 5, 1982. On the latter date TES letter 5511-161 transmitted the CQA Program Plan to all parties.

With respect to the fourth and fifth requests of the referenced letter, TES considers these to address financial and administrative aspects outside of the scope of Mr. Denton's letter. However, it should be noted that the relationships between PG&E and/or Bechtel and the IDVP, and the relationships between TES and SWEC, are not changed by the existence of the CQA program.

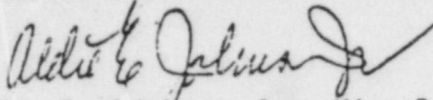
Mr. H. H. Brown, Esq.
October 29, 1982
Page 4

 TELEDYNE
ENGINEERING SERVICES

The addition of the CQA program to the IDVP in no way changes the independence of the IDVP.

Very truly yours,

TELEDYNE ENGINEERING SERVICES



Aldie E. Johnson, Jr., Vice President
Internal Services, Project 5511

AEJ:cjr

cc: W.E. Cooper
G.A. Maneatis
R.R. Fray
H.R. Denton
R. Engelken
H. Schierling
5511 Document Control

STONE & WEBSTER ENGINEERING CORPORATION
P. O. BOX 2325, BOSTON, MASSACHUSETTS 02107

DATE	November 4, 1982
J. O. NO	14296
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VIA
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Dr. W. E. Cooper
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Teledyne Engineering Services
130 Second Avenue
Waltham, MA 02254

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NOTES OF CONFERENCE
INDEPENDENT DESIGN VERIFICATION PROGRAM
PHASE II
TELEDYNE ENGINEERING SERVICES
DIABLO CANYON NUCLEAR POWER PLANT - UNIT 1

The attached Notes of Conference document the important aspects of the Scheduled Meeting held in SWEC's office on 10/21/82.

Very truly yours,

F. Sestak, Jr.

F. Sestak, Jr.
Project Manager, Diablo Canyon Nuclear Power Plant

Copies to:
GAManeatis (enc)

TO: J. Pulsipher

BA not

5/15
DOTB

NOTES OF CONFERENCE
DIAELO CANYON UNIT 1
INDEPENDENT DESIGN VERIFICATION PROGRAM
PHASE II (IDVP)

J.O. No. 14296

Held at the offices of Stone & Webster
Engineering Corporation
Boston, MA
October 21, 1982

Present for:

Bechtel

R. Chang

Diablo Canyon Project (DCP)

E. Connell, III

R. Fray

Quadrex Corporation

G. M. Leonard

R. Naymark

D. Munson

R. A. Uffer

State of California

G. Fine

Stone & Webster Engineering
Corporation (SWEC)

D. Graves

J. E. Krechting

E. F. Heneberry

J. M. Oddo

D. L. Post

C. O. Richardson

F. Sestak, Jr.

F. J. Rezendes

S. P. Sekerak

Teledyne Engineering Service (TES)

L. C. Noriega

L. Semprucci

M. Revett

D. Stratouly

U. S. Nuclear Regulatory
Commission (USNRC)

✓ J. Pulsipher

H. Walker

REFERENCES

1. DCP letter DCVP-SWEC-199 dated September 27, 1982
2. TES document, describing meeting format (attached)

PURPOSE

The purpose of the meeting was to discuss the basis of the NSC analyses and the DCP response to the SWEC generated EOI's 8001 through 8006 (Reference 1).

DISCUSSION

Mr. F. Sestak, Jr. (SWEC) began the meeting with a brief introduction. This was followed by an opening statement of the meeting format by TES (Reference 2). All in attendance introduced themselves and identified the organization they represent.

Mr. J. Oddo read EOI's 8001 through 8006 and opened the meeting for discussion of 8001. In response to EOI 8001, Mr. Uffer (Quadrex) and Mr. Connell (DCP) generally agreed that the CONTEMPT program produced an incorrect temperature. They believe that this was an isolated case resulting from improper input and numerical instabilities with the code (CONTEMPT). Quadrex stated that proper results could have been obtained by altering either the input parameters (e.g. vent area and friction factors) or by reducing the time step size.

SWEC reiterated its written position. SWEC further stated that a time step sensitivity study has been performed with CONTEMPT and the results showed that air inflow occurs independent of the time step chosen. SWEC also stated that the vent area is a fixed physical parameter and should not be changed.

The discussion proceeded to input parameters to CONTEMPT described in EOI's 8002, 8003, and 8004. Quadrex reiterated the validity of applying a moisture entrainment model in the SG blowdown. SWEC made several clarifying and supporting statements for the necessity of performing additional break size investigations if the entrainment model is used.

SWEC noted that the turbine building analysis, performed by SWEC, did not necessarily identify the worst case or highest temperature which could be postulated to occur but resulted in a temperature higher than was previously calculated as the worst case by NSC.

Quadrex stated that their analyses met all of the requirements in force at the time of their performance and that there was no requirement at that time to comply with NUREG-0588 (and IE Bulletin 79-01B). SWEC pointed out that, subsequently, the NRC required PG&E to evaluate compliance with these documents, and PG&E had stated that the NSC analyses previously supplied by PG&E to the NRC were in compliance with NUREG-0588.

The discussion proceeded to EOI 8005, flooding analysis. Mr. D. Munson (Quadrex) stated that the NSC analysis is so conservative as to completely bound all of the errors stated in the EOI. SWEC stated that, although this may be true, the errors discussed in the EOI must be explicitly addressed in a revision to the analysis.

The discussion of EOI 8006 resulted in a clarification. SWEC pointed out that the 4000 ft² vent area from the turbine building to atmosphere used by NSC could not be verified since no documentation was submitted by the DCP. SWEC has calculated a vent area of approximately 1700 ft², which was supported by the inspection of the plant.

It was decided by TES to allow discussion of EOI's 8033 and 8034. Regarding entrainment, Quadrex discussed swelling and bubble collapse in the SG. SWEC discussed the methods utilized by Westinghouse to model the steam generator. SWEC also stated that the steam separator should have been included in the steam generator model developed by NSC. SWEC defined entrainment as occurring when the enthalpy of the effluent is less than that of dry steam, considering the appropriate conditions. In the discussion of EOI 8034, SWEC stated that the NSC analysis did not account for the effect of adjacent compartments.

A general comment by Mr. Connell (DCP) was made concerning the IDVP classification of the errors found in analyses. Mr. Connell believed that some of the errors should have been classified by SWEC as "C" or "D" type errors, rather than "A" or "B" errors. SWEC reiterated its written position regarding error classification.

ACTION REQUIRED

TES. to provide SWEC written direction for addressing the DCP responses.

JMOddo:RL

Attachment

"This meeting between the IDVP and DGP was called by DGP for the purpose of discussion and clarification of
ECI ^{files} Pool No. 8000.

The participants are the IDVP and DGP. In accordance with the guidelines of Mr. Denton's letter to TES of Sept. 29, 1982, the NRC staff and the non-PG&E recipients of that letter were informed of this meeting, and may be present as observers. We also recognize that any NRC staff members present have regulatory functions which they may wish to exercise during the meeting. With the specific exceptions identified above, this is an IDVP-DGP working meeting, not a public meeting called, conducted and documented in accordance with NRC procedures. As physical host for this meeting, SNFC has the right to include, as an observer, or exclude any non-participant or non-invited observer."

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 COOPER, W.E. Teledyne Engineering Services
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director
 ENGELKEN, R.H. Region 5, Office of Director
 MANEATIS, G.A. Pacific Gas & Electric Co.

SUBJECT: Forwards "Independent Design verification Program
 Semimonthly Status kept for Nov 1982."

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MEETING ANNOUNCEMENT

DEPARTMENT DCNPP-IDVP BY W. E. Cooper/TES

SUBJECT: EOIs Pertaining to Annulus Structure.

LOCATION: Teledyne Engineering Services
Waltham, MA ROOM: Main Conference Room

DATE: November 12, 1982 TIME: 0900 - 0400

ORGANIZATION Teledyne Engineering Services

AGENDA: Review Corrective Action Plans with respect to Annulus Structure.

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ATTENDANCE REQUESTED: TES, DCP, RLCA, BNL, NRC

5/16

RFR

R.F. REEDY, INCORPORATED

236 N. Santa Cruz Avenue
Los Gatos, California 95030 • (408) 354-9110

November 15, 1982

Dr. W. E. Cooper
TELEDYNE ENGINEERING SERVICES
130 Second Avenue
Waltham, MA 02254

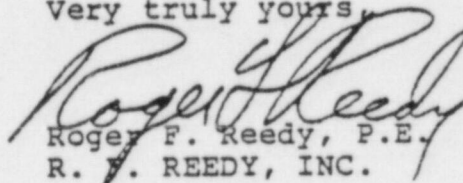
Subject: RFR, Inc. October 3rd Friday Look Ahead Report

Dear Dr. Cooper:

Regarding the RFR, Inc. audit of the DCP's implementation of their QA Program, it is planned that an audit exit meeting will be held with the DCP personnel on or about December 10, 1982.

The Diablo Canyon site portion of the corrective action audit is planned to start November 29, 1982.

Very truly yours,


Roger F. Reedy, P.E.
R. F. REEDY, INC.

RFR:na

cc: F. Sestak
E. T. Denison

docketed

5/17

November 15, 1982
Third Friday Report
Disbursement List

cc: H. Schierling (2)
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Chief Power Engineer
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November 15, 1982

Dr. W. E. Cooper
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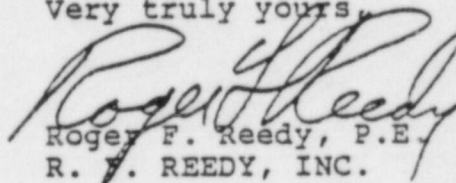
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Very truly yours,


Roger F. Reedy, P.E.
R. F. REEDY, INC.

RFR:na

cc: F. Sestak
E. T. Denison

doctored

J/17

November 15, 1982
Third Friday Report
Disbursement List

cc: H. Schierling (2)
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RFR

R.F. REEDY, INCORPORATED

236 N. Santa Cruz Avenue
Los Gatos, California 95030 • (408) 354-9110

November 15, 1982

Dr. W. E. Cooper
TELEDYNE ENGINEERING SERVICES
130 Second Avenue
Waltham, MA 02254

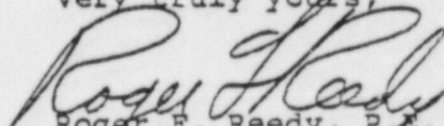
RFR, Inc., November Program Manager's Report -
3rd Friday Report

Dear Dr. Cooper:

Enclosed please find the RFR, Inc., November Program Manager's Report.

As required by DCNPP-IDVPP-PP-05 and RFR-002, individuals assigned by this organization to the IDVP have completed an acceptable Statement Regarding Potential or Apparent Conflicts of Interest.

Very truly yours,


Roger F. Reedy, P.E.
R. F. REEDY, INC

RFR:na

cc: F. Sestak
E. T. Denison

detached

5/18

RFR, Inc.
Program Manager's Report
October
3rd Friday Report

TABLE OF CONTENTS

- 1.0 WORK ACCOMPLISHED
 - 1.1 Design Chain
 - 1.2 Reviews
 - 1.3 Audits
 - 1.4 Reports
- 2.0 SCHEDULED WORK FOR NEXT REPORTING PERIOD
 - 2.1 Design Chain
 - 2.2 Reviews
 - 2.3 Audits
- 3.0 STATUS OF SCHEDULE
- 4.0 CORRECTION TO PREVIOUS PROGRAM MANAGER'S REPORT
- 5.0 MEETINGS
- 6.0 CONCLUSIONS

1.0 WORK ACCOMPLISHED

1.1 Design Chain

ITR completed.

Design chain interface diagrams submitted to TES.

1.2 Reviews

Completed

1.3 Completed.

RFR audit of DCP corrective action commenced November 11, 1982 following completion of audit checklists and TES review of checklists.

1.4 Reports

65% completed.

2.0 SCHEDULED WORK FOR NEXT REPORT PERIOD

2.1 Design Chain

Completed

2.2 Reviews

All reviews have been completed.

2.3 Audits

Audit of DCP QA Program implementation for corrective action will continue. Completion date is planned for December 3, 1982.

2.4 Reports

First draft of RFR, Inc. Review and Audit Report to be completed.

3.0 STATUS OF SCHEDULE

RFR, Inc. Reviews and Audits are progressing as planned and no schedule delays are known or anticipated.

4.0 CORRECTION TO PREVIOUS PROGRAM MANAGER'S REPORT

None.

5.0 MEETINGS

A TES QA audit of RFR, Inc. IDVP Phase II activities was performed on October 18, 1982. On October 27, 1982, RFR, Inc. had a planning meeting with the DCP at San Francisco to obtain information needed for the RFR, Inc. audit of the DCP corrective action.

6.0 CONCLUSIONS

RFR, Inc. has completed their part of the design chain and reviews and audits. An audit of DCP QA program implementation is being conducted by RFR, Inc.

November 15, 1982
Third Friday Report
Disbursement List

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November 15, 1982

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