

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

'86 OCT 21 P3:15

In the Matter of)

PACIFIC GAS AND ELECTRIC)
COMPANY)

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

Docket Nos. 50-275 OLA
50-323 OLA
(Spent Fuel Pool)

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NRC STAFF SECOND SET OF INTERROGATORIES AND
REQUEST FOR DOCUMENTS FROM CONSUMERS ORGANIZED FOR
DEFENSE OF ENVIRONMENTAL SAFETY REGARDING CONTENTION 14

The NRC staff hereby requests that Consumers Organized for Defense of Environmental Safety (CODES) pursuant to 10 C.F.R. §§ 2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce or make available for inspection and copying, all documentary material identified in responses to interrogatories below. Each response to the interrogatories below shall be under oath or affirmation of the individual(s) who contributed thereto. For all references requested in these interrogatories, identify them by author, title, date of publication and publisher if the reference is published, and if it is not published, identify the document by the author, title, the date it was written, the qualifications of the author relevant to this proceeding, and where a copy of the document may be obtained.

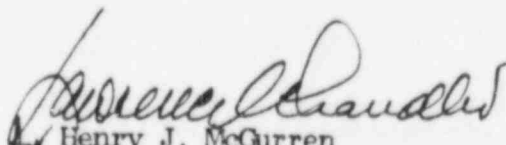
CODES Contention 14

Neutron embrittlement and other metallurgical deterioration and environmental stresses to the structural integrity of the spent fuel ponds have not been adequately analyzed and determined for the period of the license.

Interrogatories

- 2-1a. Identify what person or persons you now rely upon to substantiate in whole or in part your position on CODES Contention 14.
- b. Provide the addresses and education and professional qualifications of any persons named in your response to a. above.
- c. Identify which of the above persons or any other person you may call as witnesses on this contention.
- 2-2. Provide summaries of the views, positions or proposed testimony on CODES Contention 14 of all persons named in response to Interrogatory 2-1, that you intend to present as witnesses during this proceeding.
- 2-3. State the specific bases and references to any documents upon which the persons named in response to Interrogatory No. 2-1 rely to substantiate their views regarding CODES Contention 14.
- 2-4. With regard to CODES Contention 14, identify all documentary or other material that you intend to use during this proceeding to support these contentions and that you may offer as exhibits on these contentions or refer to during your cross-examination of witnesses presented by the Licensee and/or the NRC staff.
- 2-5. With regard to CODES Contention 14, specifically identify the structures of the "spent fuel ponds" that you assert will be affected by "[n]eutron embrittlement and other metallurgical deterioration and environmental stresses."
- 2-6. With regard to CODES Contention 14, explain what you mean by "environmental stresses."

Respectfully submitted,


Henry J. McGurren
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 20th day of October, 1986