

1227

RELATED CORRESPONDENCE

DOCKETED
USNPC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'86 OCT 23 P12:32

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF THE
DOCKETING AND
BRANCH

In the Matter of)

Docket Nos. 50-275

50-323-01A

PACIFIC GAS AND ELECTRIC COMPANY)

(Reracking of Spent Fuel Pools)

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

LICENSEE PACIFIC GAS AND ELECTRIC COMPANY'S
SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS TO THE SIERRA CLUB

Pursuant to 10 CFR 2.740b, Licensee PACIFIC GAS AND ELECTRIC COMPANY hereby propounds the following interrogatories and document requests to Sierra Club on its Contentions I and II.

INSTRUCTIONS

1. All information is to be divulged which is in the possession of the individual, association, or corporate party, their attorneys, consultants, investigators, agents, employees, witnesses or other representatives of the named party.

2. Where you have incomplete information that precludes your fully answering an interrogatory, give such information as you have and state what information you do not have. If you are unable to give the information in the form sought but have the information aggregated differently, give the information in the form in which you have it and explain the reason for the deviation.

3. When asked in the interrogatories below to identify or to give

1 the identity of a person, please give the following information about him or
2 her:

3 (a) full name;

4 (b) present job title, employer, and telephone number.

5 4. When asked in the interrogatories below to identify or to give
6 the identity of a document or writing, please give the following information
7 about the document:

8 (a) its title, if any;

9 (b) its nature (e.g., letter, memorandum, chart, computer
10 printout, ledger, notes, etc.);

11 (c) the date, if any, stated on the document;

12 (d) the identity of each person who signed it;

13 (e) the identity of each person to whom it is addressed;

14 (f) the present location of the document.

15 5. Where an individual interrogatory calls for an answer which
16 involves more than one part, each part of the answer should be clearly set out
17 so that it is understandable.

18 6. These interrogatories are intended as continuing interrogatories,
19 requiring you to answer by supplemental answer, setting forth any information
20 within the scope of the interrogatories as may be acquired by you, your
21 agents, attorneys or representatives following your original answers up to the
22 time of hearing.

23 7. "Documents" include printed material, writings, calculations,
24 worksheets, handwritten notes, photographs, xerox reproductions, and audio or
25 video recordings. "Writings" and "recordings" consist of letters, words, or
26 numbers, or their equivalent, set down by handwriting, typewriting, printing,

1 photostating, photographing, magnetic impulse, mechanical or electronic
2 recording, or other form of data compilation, as defined in Rule 1001 of the
3 Federal Rules of Evidence, 28 U.S.C.

4 INTERROGATORIES

5 1. Please provide the freebody diagram and equations of motion used
6 in developing the computer program presented in Appendix A (pp. 32, 33, and
7 34) to your Response dated October 3, 1986 ("Response") to PGandE's First Set
8 of Interrogatories dated September 16, 1986.

9 2. In his time-history model (THM) (Response, p. 12), Dr. Ferguson
10 assumes that "half the mass of fuel moves separately" from the rack. Please
11 state each and every fact upon which that assumption is based.

12 3. Please provide initial velocities and displacements used in
13 developing the plots shown on Figure 1 and Figure 2 (pp. 29 and 30) of your
14 Response.

15 4. Dr. Ferguson asserts (Response, p. 16) that "We have constructed
16 a simple model which also results in rack displacements of several inches and
17 which predict the maximum speed for a free rack to be of the order of 24
18 inches/second" (Page 16). Please provide plots of the displacement and
19 velocity time-histories.

20 5. Dr. Ferguson asserts (Response, p. 19) that "A different
21 expression for predicting fluid coupling forces between racks is currently
22 being investigated" using Bernoulli's law. Please provide the assumptions and
23 the form of Bernoulli's equation that are being used by Dr. Ferguson to
24 develop hydraulic coupling effects.

25 ///

26 ///

1 6. Please provide a diskette of Dr. Ferguson's computer program
2 presented in Appendix A (pp. 32, 33, and 34) of your Response.
3

4 Respectfully submitted,

5 BRUCE NORTON
6 c/o P. A. Crane

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13
14 By 
15 Bruce Norton

16
17 DATED: October 20, 1986
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26

RELATED CORRESPONDENCE

DOCKETED
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'86 OCT 23 P4:52

In the Matter of)

PACIFIC GAS AND ELECTRIC COMPANY)

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

Docket Nos. 90-275

50-323-D-1A

(Reracking of Spent Fuel Pools)

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 1986, copies of the following documents in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class: (1) LICENSEE PACIFIC GAS AND ELECTRIC COMPANY'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO THE SIERRA CLUB.

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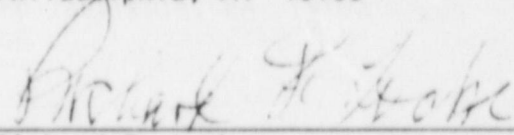
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Dated at San Francisco, California, this 20th day of October, 1986.