

8/5/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
RELATED CORRESPONDENCE

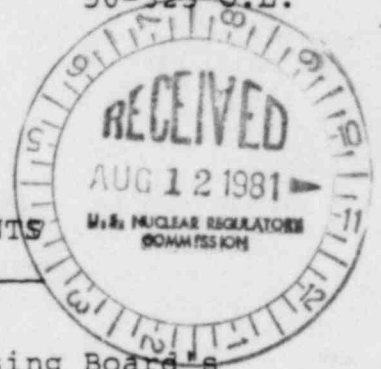
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
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PACIFIC GAS AND ELECTRIC COMPANY)
)
)
(Diablo Canyon Nuclear Power)
Plant, Unit Nos. 1 and 2))
)

Docket Nos. 50-275 O.L.
50-323 O.L.

GOVERNOR EDMUND G. BROWN JR.
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO PACIFIC GAS AND ELECTRIC COMPANY



Pursuant to 10 C.F.R. § 2.741 and the Licensing Board's August 4, 1981, Memorandum and Order, Governor Brown requests Pacific Gas and Electric Company to produce for inspection and copying the documents described below. ^{1/} PG&E is requested to produce these documents at the offices of the undersigned counsel, 1900 M Street, N.W., Washington, D.C. 20036, on or before September 8, 1981, unless another time or location is agreed upon among the parties.

As used herein, "documents" includes, but is not limited to, emergency plans and procedures, construction plans and specifications, papers, photographs, criteria, standards of review, recordings, memoranda, books, records, writings, letters, telegrams, mailgrams, correspondence, notes and minutes of meetings or of conversations or of phone calls, interoffice, intra-corporate

1/ Governor Brown intends to file additional discovery requests in the near future covering other aspects of the issues to be litigated.

memoranda or written communications of any nature, intraagency memoranda or written communications of any nature, recordings of conversations either in writing or upon any mechanical or electronic or electrical recording devices, notes, exhibits, appraisals, work papers, reports, studies, opinions, analyses, assessments, surveys, evaluations, projections, hypotheses, formulas, designs, drawings, manuals, notebooks, worksheets, contracts, agreements, letter agreements, diaries, desk calendars, charts, schedules, appointment books, punchcards and computer printout sheets, computer data, telecopier transmissions, directives, proposals, and all drafts, revisions, and differing versions (whether formal or informal) of any of the foregoing, and also all copies of any of the foregoing which differ in any way (including handwritten notations or other written or printed matter of any nature) from the original.

Request 1. All documents in the possession, custody or control of PG&E (including the possession, custody, or control of any contractor, employee, consultant, or agent of PG&E) which relate in any way to the NRC Staff request of December 16, 1980, that PG&E "evaluate the potential complicating factors which might be caused by earthquakes which either initiate or follow the initiation of accidents." A copy of the Staff's December 16 request is attached hereto. Without limitation of the scope of this request, documents within the scope of Request 1 include:

- (a) The contractor report referenced by Staff witness Mr. John Sears at page 7 of his prepared testimony

in the Diablo Canyon fuel load and low power test proceeding;

- (b) All analyses, memoranda, and work papers related to such contractor report;
- (c) PG&E's written agreement or contract with such contractor for preparation of such contractor's report, including any documents related to the performance schedule and scope of work to be performed by such contractor under the agreement or contract;
- (e) Any correspondence between PG&E and the NRC Staff related to earthquake analyses requested in the NRC Staff's December 16, 1980, letter; and
- (f) Any correspondence, memoranda, or other documents between PG&E and the Federal Emergency Management Agency covering potential effects of an earthquake in emergency plans or preparedness at Diablo Canyon and the surrounding Emergency Planning Zones.

Request 2. All documents in the possession, custody or control of PG&E (including the possession, custody or control of any contractor, employee, consultant, or agent of PG&E) which analyse or relate to any analysis or evaluation of the ability of onsite and/or offsite emergency preparedness (both persons and systems) at Diablo Canyon and in the Emergency Planning Zones to function in the event of an earthquake which is greater than the SSE. Without limitation of the scope of this request, all documents

which address emergency response actions to be taken in the event of an earthquake greater than the SSE are within the scope of this Request 2.

Request 3. Any revisions (in draft or final form) to the PG&E Emergency Response Plan or to PG&E Emergency Procedures which set forth, in whole or in part, actions to be taken to respond to the potential complicating effects of an earthquake.

Request 4. All documents in the possession, custody or control of PG&E (including the possession, custody or control of any contractor, employee, consultant, or agent of PG&E) which analyse or relate to the effect of an earthquake, including an earthquake greater than the SSE, on onsite and/or offsite preparedness to:

- (a) Communicate among or between PG&E and County, State, and/or federal government officials;
- (b) Alert persons anywhere within the plume exposure EPZ to evacuate or to take other protective actions;
- (c) Conduct evacuation of (1) the Diablo Canyon site and (2) the surrounding plume exposure EPZ;
- (d) Provide medical assistance to persons within the plume exposure EPZ; and/or
- (e) Conduct radiological monitoring within the plume exposure and injection exposure EPZ's.

Request 5. All documents in the possession, custody or control of PG&E (including the possession, custody or control of

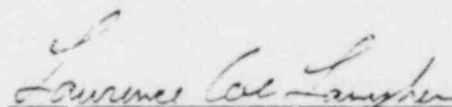
any contractor, employee, consultant, or agent of PG&E) which analyse or relate to whether (a) the onsite operations support center and/or (b) the offsite emergency operations facility (both the present interim facility and the proposed permanent facility) will be available to function without interruption in the event of an earthquake, including an earthquake exceeding the SSE.

Request 6. Revision 3 of the PG&E Emergency Plan or, if not yet available, any draft(s) thereof.

Request 7. The PG&E Emergency Procedures described at the Diablo Canyon fuel load and low power test hearing (e.g., Tr. 10,827) and any revisions thereto.

Respectfully submitted,

Byron S. Georgiou
Legal Affairs Secretary
Governor's Office
State Capitol
Sacramento, California 95814



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1900 M Street, N.W.
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Attorneys for Governor Brown of the
State of California

August 5, 1981



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DEC 16 1980

Docket Nos.: 50-275/323

Mr. Malcolm H. Furbush
Vice President - General Counsel
Pacific Gas & Electric Company
P.O. Box 7442
San Francisco, California 94106

Dear Mr. Furbush:

SUBJECT: EFFECTS OF EARTHQUAKES ON DIABLO CANYON, UNITS 1 & 2 EMERGENCY PLANS

We are requesting that you evaluate the potential complicating factors which might be caused by earthquakes which either initiate or follow the initiation of accidents. Two general cases should be considered. First, a severe earthquake at the site which could disrupt normal power and auxiliary services and thereby cause the plant to be in a degraded mode should be considered. An Alert or higher emergency class, depending on specific plant damage would be declared in such a case in accordance with Appendix 1 of NUREG-0654, Rev. 1. The facility emergency plans should be capable of functioning under such conditions. Of principal importance under such conditions would be augmentation of the facility staff and supporting resources to assure that a more severe accident did not develop. Factors to be considered for your facility plans should include the impacts due to potential disruption of communications networks and transportation routes. Your concern should be the availability of resources and personnel to augment onsite staff, transit to and among emergency response facilities and communications with offsite organizations. Arrangements should be made such that equipment to be used in such circumstances (such as helicopters, offroad vehicles, etc.) will be dedicated for use by the plant even under pressing and competing needs such as offsite rescue missions. These aspects must be satisfactorily addressed prior to full power operation.

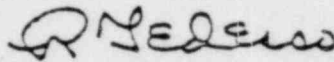
The second case which should be considered is an earthquake offsite which disrupts communications networks and transportation routes in particular locales. In California, such occurrences appear to be frequent enough to warrant consideration in your emergency plans. The procedures to be used to determine the protective actions recommended to offsite authorities should be revised to incorporate consideration of earthquake effects offsite. Evacuation time estimates should incorporate consideration of local transportation route disruption.

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We are requesting FEMA to review the adequacy of State and local capabilities with respect to response during earthquakes. A copy of our memo to FEMA is enclosed.

Sincerely,



Robert L. Tedesco, Assistant Director
for Licensing
Division of Licensing

Enclosure:
Memo to FEMA dtd.
11/03/80

cc: See next page.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

NOVEMBER 2 1980

MEMORANDUM FOR: John McConnell, Assistant Associate Director for
Population Preparedness, FEMA

FROM: Brian K. Grimes, Program Director, Emergency Preparedness
Program Office, NRR

SUBJECT: REQUEST FOR FEMA ASSISTANCE TO REVIEW EFFECTS OF
EARTHQUAKE AND VOLCANIC ERUPTION ON STATE/LOCAL
EMERGENCY PLANS

As we have discussed, in the course of our review of licensed utility emergency plans, volcanic eruptions and catastrophic earthquakes have emerged as two issues of high public interest. To insure that these issues are being adequately addressed, we request that FEMA review the State and local planning efforts for the areas around California nuclear power plant sites and the Trojan site with respect to the complications which might arise in the event of extreme natural phenomena and how these can best be addressed in the planning process.

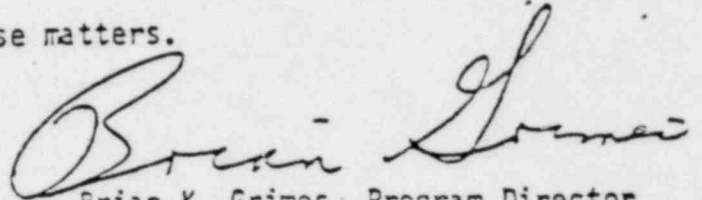
In conjunction with the Trojan plant evaluation for compliance with the new NRC emergency planning regulations, the Commission has directed that the problems of effective protective measures and evacuation during or soon after volcanic eruption (giving due consideration to the possible effects of severe ashfall, mudflows, floods, and landslides) be closely examined. In this regard, we are requesting the licensed utility to revise its emergency plan to explicitly address the possible problems associated with an eruption. This will include considerations of site access during an emergency, assured communications and appropriate revision of the evacuation time estimates used in protective action determinations. The Oregon State Department of Energy, has already addressed the feasibility of implementing effective protective measures during an eruption (enclosure 1).

The earthquake issue has particular relevance to nuclear plants in California (i.e., Diablo Canyon, Humboldt Bay, Rancho Seco and San Onofre). We understand from the FEMA news release of September 29, 1980 that FEMA will lead a team consisting of personnel from Federal, State and local agencies to accelerate efforts towards improving the state of readiness to cope with potential major earthquakes in California. In this regard we request that FEMA include in its evaluation of offsite emergency plans, a qualitative evaluation of complicating factors which might be caused by earthquakes for California nuclear power reactor sites. Specifically,

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such evaluation should include the impacts on State/local emergency plans due to potential disruption of communications networks and evacuation routes. In this regard, we are requesting the affected licensees to revise their emergency plans to explicitly address the possible problems associated with an earthquake to include the type of potential complications discussed above for the Trojan facility.

Thank you for your assistance in these matters.



Brian K. Grimes, Program Director
Emergency Preparedness Program Office
Office of Nuclear Reactor Regulation

Enclosure:
Oregon DOE Study
Report Measures

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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PACIFIC GAS AND ELECTRIC COMPANY)

(Diablo Canyon Nuclear Power)
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CERTIFICATE OF SERVICE

I hereby certify that copies of "GOVERNOR EDMUND G. BROWN JR. FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PACIFIC GAS AND ELECTRIC COMPANY" have been served to the following on August 5, 1981 by U.S. mail, first class, except as otherwise noted.

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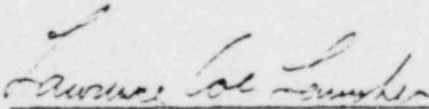
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August 5, 1981

(*) By Federal Express on August 5, 1981