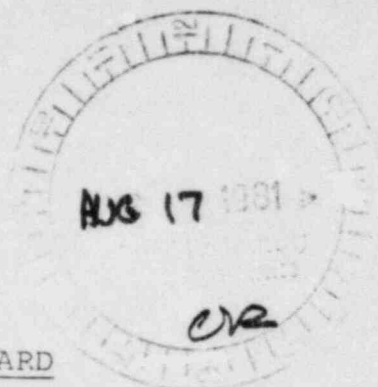


8/14/81



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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

JOINT INTERVENORS' FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
PACIFIC GAS AND ELECTRIC COMPANY



I. Interrogatories

Pursuant to 10 C.F.R. §2.740(b), the SAN LUIS OBISPO MOTHERS FOR PEACE, SCENIC SHORELINE PRESERVATION CONFERENCE, INC., ECOLOGY ACTION CLUB, SANDRA SILVER, GORDON SILVER, ELIZABETH APFELBERG, and JOHN J. FORSTER ("Joint Intervenor") hereby request that the attached interrogatories be answered fully, in writing, and under oath by any officers or employees of Pacific Gas and Electric Company ("Applicant") who have personal knowledge thereof. The answer to each interrogatory should contain the name(s) and identification of the person(s) supplying the answer whether or not he or she has verified the answer.

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The term "document" as used herein means the original or copy of any kind of written, typewritten, printed or recorded material whatsoever, including, but not limited to, notes, transcriptions of notes, memoranda, letters, speeches, press releases, newspapers and magazine articles, editorials, telegrams, or other correspondence, publications, work sheets, recordings, studies, analyses, supplements, opinions, books, reports, transcriptions of recordings, information retrievable from computers, pictures, drawings, photographs or other graphic representations, or other records, relating to or pertaining in any way to the subject matter to which each interrogatory refers.

Each question is to be answered in 4 parts as follows:

- A. Provide the direct answer to the question.
- B. Identify all documents and studies, and the particulars thereof, relied upon by the Applicant now or in the past, which serve as the basis for the answer. In lieu thereof, at Applicant's option, a copy of such document and study may be attached to the answer.
- C. Explain whether the Applicant and/or any independent contractor are presently engaged in or intend to engage in further research or work which may bear on the issues covered in the interrogatory. If so, please identify such research or work and the person(s) responsible therefor.

- D. (1) Identify the expert(s), if any, whom the Applicant intends to have testify on the subject matter covered in the interrogatory. State the qualifications of each such expert. (2) Present a summary of each expert's proposed testimony on Joint Intervenors' contention 1. (3) Identify all cases in which any such expert has previously testified and state the subject matter of such testimony.
1. Explain the present Applicant position on Joint Intervenors' contention 1, regarding emergency response planning.
 2. Does the current position differ from the position of the Applicant in any prior proceedings? If so, identify the proceeding(s), explain the prior position, and explain the basis for the change in position.
 3. Identify any officers or employees of, or consultants to, the Applicant who dissent from the present Applicant position on Joint Intervenors' contention 1. Explain the reasons for which any such person dissents.
 4. Identify the specific sections and page numbers of the FSAR for Diablo Canyon and the NRC Staff's SER and SER Supplements for Diablo Canyon, which are relied upon in formulating the Applicant position on Joint Intervenors' contention 1.

5. Identify all sections and page numbers of the FSAR, SER, and SER Supplements which contain subject matter pertaining to Joint Intervenor's contention 1.
6. Does the Applicant contend that the Applicant, state, and local emergency response plans for Diablo Canyon as they are presently constituted comply with the Commission's revised emergency planning regulations, effective November 3, 1980 ("Final Regulations on Emergency Planning," 45 Fed. Reg. 55402 (August 19, 1980))?
7. If the answer to interrogatory 6 is yes, specify each and every fact supporting that answer.
8. If the answer to interrogatory 6 is no, does the Applicant contend that the Commission's revised emergency planning regulations need not be complied with prior to issuance of a full power license at Diablo Canyon? Specify each and every fact supporting the answer to this interrogatory.
9. If the answer to interrogatory 6 is no, using a section by section analysis explain how and in what sections the Applicant, state, and local emergency plans do not comply with the Commission's revised emergency planning regulations.
10. Specify any and all revisions or changes to be made by the Applicant in the applicable emergency plans referred to in Joint Intervenor's contention 1, and any and all actions which the Applicant intends to

take, to eliminate prior to full power operation at Diablo Canyon any deficiencies in those plans as they relate to the Commission's revised emergency planning regulations.

11. Specify what, if any, deficiencies in the Applicant, state, and local emergency plans as they relate to the Commission's revised emergency planning regulations will not be eliminated prior to full power operation at Diablo Canyon.
12. With respect to any of the deficiencies specified in answer to interrogatory 11, explain why they are not significant for Diablo Canyon and what interim actions have been or will be taken to compensate for the deficiencies.
13. Specify precisely how, if at all, the Applicant, state, and local emergency plans for Diablo Canyon consider, allow for, or describe the possible effects on the implementation of those emergency plans of a major earthquake which occurs simultaneously with, or initiates, a radiological emergency at Diablo Canyon.
14. If the answer to interrogatory 13 is no, will such consideration and information be included in the relevant plans prior to full power operation at Diablo Canyon?
15. If the answer to interrogatory 13 is yes, specify how such plans consider, allow for, or describe

the effects on the implementation of such plans of an earthquake greater than the shutdown earthquake ("SSE") which occurs simultaneously with, or initiates, a radiological emergency at Diablo Canyon.

16. Specify how and where, if at all, the "Evacuation Times Assessment for the Diablo Canyon Nuclear Power Plant" (April 1980) (Voorhees and Assoc.) (1) considers the complicating effects of an earthquake on emergency evacuation and (2) describes precisely the extent of the increases in evacuation time which could result if such an event were to occur simultaneously with a radiological emergency at Diablo Canyon.
17. Describe in detail what, if any, efforts the Applicant has made or intends to make prior to full power operation to update and revise (in accord with NUREG-0654) the letters of agreement set forth in Appendix 7 to its on site emergency plan.
18. Describe how the Applicant intends to notify the public about appropriate protective actions which should be taken in the event of an emergency. Specify when any proposed notification system will be fully operational and how long it will take to notify all persons within 10 miles of the reactor.

19. Do the Applicant, state, and local emergency plans for Diablo Canyon contain the actual wording of emergency messages or the standard format for detailed initial and follow-up communications?
If not, why not?
20. Describe in detail the public information program or measures which the Applicant intends to implement to comply with 10 C.F.R. §50.47(b)(7). When will that program or those measures be implemented?
21. Describe in detail how, if at all, the emergency response facilities for Diablo Canyon will not comply with the criteria set forth in NUREG-0696, entitled "Functional Criteria for Emergency Response Facilities, Final Report," prior to full power operation at Diablo Canyon.
22. Explain how the decision will be made whether to order sheltering or evacuation during an atmospheric release of radioactivity. What factors will be considered in making the decision? What criteria will be applied to decide when to evacuate as opposed to when to shelter?
23. Who will order the appropriate protective action for the public and on the basis of what information and criteria?
24. In endorsing the concept of EP2 planning guidance, the Commission stated "it is appropriate and prudent for emergency planning guidance to take into

consideration the principal characteristics . . . of a spectrum of design basis and core melt accidents." 44 Fed. Reg. 61123 (October 23, 1979). Explain how the Diablo Canyon emergency response plans in effect at the time of full power operation will consider the principal characteristics and effects of a spectrum of core melt accidents.

25. Specify in detail what efforts, if any, the Applicant has made to achieve coordination of its emergency response organization with all officials responsible for emergency preparedness and response in (a) Avila Beach, (b) Los Osos, (c) Montana de Oro State Park, (d) Cayucos, (e) Pismo Beach, (f) Oceano, (g) Atascadero, (h) Arroyo Grande, (i) Morro Bay, (j) Nipomo, (k) Cambria, (l) Santa Maria, (m) Paso Robles, (n) San Luis Obispo, and (o) local beaches and parks, including Pismo, Cayucos, Morro Strand, and Atascadero.
26. Specify what efforts, if any, the Applicant has made to date to educate and inform the public within a 50 mile radius of Diablo Canyon regarding what medical facilities to contact in the event of radiation-related injury, what actions to take in the event of a radiological emergency, what the risks of operation of the reactor are, and what the evacuation routes are in the event of a radiological emergency.

27. Describe all emergency preparedness drills and/or exercises which have been conducted by the Applicant and/or local and state officials in which the northern evacuation route from the site has been utilized.
28. Describe in detail all available evacuation routes from Diablo Canyon in the event both the main entrance to the plant from Avila Beach and the northern evacuation route through the Field Ranch are blocked.

II. Request for Production of Documents

Pursuant to 10 C.F.R. §2.741, Joint Intervenors hereby request that the documents described herein be produced for inspection and copying at the office of the undersigned counsel, Center for Law in the Public Interest, 10203 Santa Monica Blvd., Los Angeles, California 90067, on or before September 15, 1981, unless another time or location is agreed upon.

Each document is relevant to Joint Intervenor's admitted contention 1, regarding emergency response planning at Diablo Canyon. The term "document" as used herein is consistent with the definition set forth supra at 2.

1. All documents identified in response to interrogatories 1-28 supra.
2. All documents in the possession, custody, or control of PG and E or its agents which relate to the December 16, 1980 letter from Tedesco to Furbush,

entitled "Effects of Earthquakes on Diablo Canyon, Units 1 and 2 Emergency Plans," and to the request contained therein.

3. All documents in the possession, custody, or control of PG and E or its agents which relate to the November 3, 1980 NRC memorandum from Grimes to McConnell entitled "Request for FEMA Assistance to Review Effects of Earthquake and Volcanic Eruption on State/Local Emergency Plans," and to the request contained therein.
4. All documents in the possession, custody, or control of PG and E or its agents which relate to the subject of the possible effects of earthquakes on implementation of the Applicant, state, and local emergency plans for Diablo Canyon, including, but not necessarily limited to, the effects on communications, transportation routes, evacuation, provision of medical assistance, and notification of PG and E personnel and the public generally.
5. All documents within the possession, custody, or control of PG and E or its agents which relate to establishment, development, or implementation of a public education and information program or other measures relevant to the requirement set forth at 10 C.F.R. §50.47(b)(7).
6. All correspondence and documents in the possession, custody, or control of PG and E or its agents relating to efforts, if any, by PG and E or its agents

to achieve coordination with all officials responsible for emergency preparedness and response in the cities, areas, and jurisdictions listed supra in interrogatory 25.

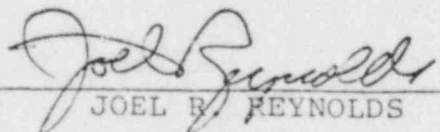
7. All documents in the possession, custody, or control of PG and E or its agents relating to off site preparedness at Diablo Canyon, including all correspondence and memoranda between (1) PG and E or its agents and FEMA and (2) PG and E or its agents and the NRC, its staff, or its agents.

Dated: August 14, 1981

Respectfully submitted,

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UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

PACIFIC GAS AND ELECTRIC COMPANY)

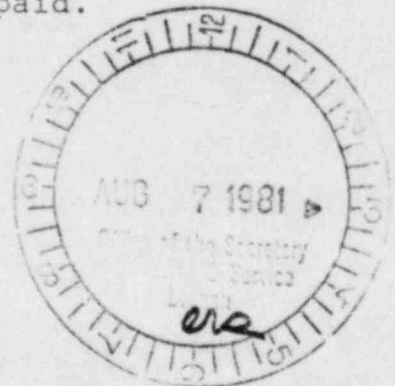
(Diablo Canyon Nuclear Power)
 Plant, Units 1 and 2)

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

(Low Power Test Proceeding)

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of August, 1981, I have served copies of the foregoing JOINT INTERVENORS' FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO PACIFIC GAS AND ELECTRIC COMPANY, mailing them through the U.S. mails, first class, postage prepaid.



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