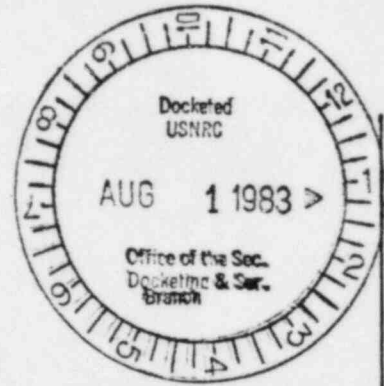


RELATED CORRESPONDENCE ORIGINAL



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)	
PACIFIC GAS AND ELECTRIC COMPANY)	Docket No. 50-275
Diablo Canyon Nuclear Power Plant)	Docket No. 50-323
Units Nos. 1 and 2)	(Reopened Hearing --
)	Design Quality
)	Assurance)

LICENSEE PACIFIC GAS AND ELECTRIC COMPANY'S
SECOND SET OF INTERROGATORIES
TO GOVERNOR DEUKMEJIAN

Pursuant to 10 C.F.R. § 2.740b, Licensee PACIFIC GAS AND ELECTRIC COMPANY hereby propounds the following Interrogatories to GOVERNOR DEUKMEJIAN.

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.

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

8 3. When asked in the interrogatories below to
9 identify or to give the identity of a person, please give
10 the following information about him or her:

11 (a) full name;

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

14 4. When asked in the interrogatories below to
15 identify or to give the identity of a document or writing,
16 please give the following information about the document:

17 (a) its title, if any;

18 (b) its nature (e.g., letter, memorandum,
19 chart, computer printout, ledger);

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

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

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

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1 5. Where an individual Interrogatory calls for
2 an answer which involves more than one part, each part of
3 the answer should be clearly set out so that it is
4 understandable.

5 6. These Interrogatories are intended as
6 continuing Interrogatories, requiring you to answer by
7 supplemental answer, setting forth any information within
8 the scope of the Interrogatories as may be acquired by you,
9 your agents, attorneys or representatives following your
10 original answers up to the time of hearing.

11 7. "Documents" include printed material, writ-
12 ings, handwritten notes, photographs, xerox reproductions,
13 and audio or video recordings. "Writings" and "recordings"
14 consist of letters, words, or numbers, or their equivalent,
15 set down by handwriting, typewriting, printing,
16 photostating, photographing, magnetic impulse, mechanical or
17 electronic recording, or other form of data compilation, as
18 defined in Rule 1001 of the Federal Rules of Evidence, 28
19 U.S.C.

20 INTERROGATORIES

21 1. State each and every fact upon which you base
22 your contention that the licensee has failed to timely
23 develop and implement a systematic quality assurance/quality
24 control program for the design of safety related structures,
25 systems and components for design work at Diablo Canyon
26 Units 1 and 2 since November 1, 1981.

1 2. State each and every fact upon which you base
2 your contention that the licensee's major subcontractors at
3 Diablo Canyon Units 1 and 2 have failed to timely develop
4 and implement a systematic quality assurance/quality control
5 program for the design of safety related structures, systems
6 and components for design work at Diablo Canyon Units 1 and
7 2 since November 1, 1981.

8 3. Please list each and every major subcontractor
9 for Diablo Canyon Units 1 and 2 who has been involved in
10 the design of safety related structures and/or systems
11 and/or components.

12 (a) For each such subcontractor state:

13 (i) the time period when the subcontractor did design
14 of safety related structures, systems and
15 components for Diablo Canyon Units 1 and 2.

16 (ii) the time period you allege when the subcontractor
17 did not develop and implement a systematic quality
18 assurance/quality control program.

19 4. For each and every major subcontractor for
20 Diablo Canyon Units 1 and 2, state specifically each and
21 every fact you rely on as a basis for your allegation that
22 each such subcontractor's design quality assurance program
23 failed to comply with criterion 1 of Appendix B to 10 C.F.R.
24 part 50 prior to November 1, 1981.

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1 5. For each and every major subcontractor for
2 Diablo Canyon Units 1 and 2, state specifically each and
3 every fact you rely on as a basis for your allegation that
4 each such subcontractor's design quality assurance program
5 failed to comply with criterion 2 of Appendix B to 10 C.F.R.
6 part 50 prior to November 1, 1981.

7 6. For each and every major subcontractor for
8 Diablo Canyon Units 1 and 2, state specifically each and
9 every fact you rely on as a basis for your allegation that
10 each such subcontractor's design quality assurance program
11 failed to comply with criterion 3 of Appendix B to 10 C.F.R.
12 part 50 prior to November 1, 1981.

13 7. For each and every major subcontractor for
14 Diablo Canyon Units 1 and 2, state specifically each and
15 every fact you rely on as a basis for your allegation that
16 each such subcontractor's design quality assurance program
17 failed to comply with criterion 4 of Appendix B to 10 C.F.R.
18 part 50 prior to November 1, 1981.

19 8. For each and every major subcontractor for
20 Diablo Canyon Units 1 and 2, state specifically each and
21 every fact you rely on as a basis for your allegation that
22 each such subcontractor's design quality assurance program
23 failed to comply with criterion 5 of Appendix B to 10 C.F.R.
24 part 50 prior to November 1, 1981.

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1 9. For each and every major subcontractor for
2 Diablo Canyon Units 1 and 2, state specifically each and
3 every fact you rely on as a basis for your allegation that
4 each such subcontractor's design quality assurance program
5 failed to comply with criterion 6 of Appendix B to 10 C.F.R.
6 part 50 prior to November 1, 1981.

7 10. For each and every major subcontractor for
8 Diablo Canyon Units 1 and 2, state specifically each and
9 every fact you rely on as a basis for your allegation that
10 each such subcontractor's design quality assurance program
11 failed to comply with criterion 7 of Appendix B to 10 C.F.R.
12 part 50 prior to November 1, 1981.

13 11. For each and every major subcontractor for
14 Diablo Canyon Units 1 and 2, state specifically each and
15 every fact you rely on as a basis for your allegation that
16 each such subcontractor's design quality assurance program
17 failed to comply with criterion 10 of Appendix B to 10
18 C.F.R. part 50 prior to November 1, 1981.

19 12. For each and every major subcontractor for
20 Diablo Canyon Units 1 and 2, state specifically each and
21 every fact you rely on as a basis for your allegation that
22 each such subcontractor's design quality assurance program
23 failed to comply with criterion 16 of Appendix B to 10
24 C.F.R. part 50 prior to November 1, 1981.

25 13. For each and every major subcontractor for
26 Diablo Canyon Units 1 and 2, state specifically each and

1 every fact you rely on as a basis for your allegation that
2 each such subcontractor's design quality assurance program
3 failed to comply with criterion 17 of Appendix B to 10
4 C.F.R. part 50 prior to November 1, 1981.

5 14. For each and every major subcontractor for
6 Diablo Canyon Units 1 and 2, state specifically each and
7 every fact you rely on as a basis for your allegation that
8 each such subcontractor's design quality assurance program
9 failed to comply with criterion 18 of Appendix B to 10
10 C.F.R. part 50 prior to November 1, 1981.

11 15. For each and every major subcontractor for
12 Diablo Canyon Units 1 and 2, state specifically each and
13 every fact you rely on as a basis for your allegation that
14 each such subcontractor's design quality assurance program
15 failed to comply with criterion 1 of Appendix B to 10 C.F.R.
16 part 50 since November 1, 1981.

17 16. For each and every major subcontractor for
18 Diablo Canyon Units 1 and 2, state specifically each and
19 every fact you rely on as a basis for your allegation that
20 each such subcontractor's design quality assurance program
21 failed to comply with criterion 2 of Appendix B to 10 C.F.R.
22 part 50 since November 1, 1981.

23 17. For each and every major subcontractor for
24 Diablo Canyon Units 1 and 2, state specifically each and
25 every fact you rely on as a basis for your allegation that
26 each such subcontractor's design quality assurance program

1 failed to comply with criterion 3 of Appendix B to 10 C.F.R.
2 part 50 since November 1, 1981.

3 18. For each and every major subcontractor for
4 Diablo Canyon Units 1 and 2, state specifically each and
5 every fact you rely on as a basis for your allegation that
6 each such subcontractor's design quality assurance program
7 failed to comply with criterion 4 of Appendix B to 10 C.F.R.
8 part 50 since November 1, 1981.

9 19. For each and every major subcontractor for
10 Diablo Canyon Units 1 and 2, state specifically each and
11 every fact you rely on as a basis for your allegation that
12 each such subcontractor's design quality assurance program
13 failed to comply with criterion 5 of Appendix B to 10 C.F.R.
14 part 50 since November 1, 1981.

15 20. For each and every major subcontractor for
16 Diablo Canyon Units 1 and 2, state specifically each and
17 every fact you rely on as a basis for your allegation that
18 each such subcontractor's design quality assurance program
19 failed to comply with criterion 6 of Appendix B to 10 C.F.R.
20 part 50 since November 1, 1981.

21 21. For each and every major subcontractor for
22 Diablo Canyon Units 1 and 2, state specifically each and
23 every fact you rely on as a basis for your allegation that
24 each such subcontractor's design quality assurance program
25 failed to comply with criterion 7 of Appendix B to 10 C.F.R.
26 part 50 since November 1, 1981.

1 22. For each and every major subcontractor for
2 Diablo Canyon Units 1 and 2, state specifically each and
3 every fact you rely on as a basis for your allegation that
4 each such subcontractor's design quality assurance program
5 failed to comply with criterion 10 of Appendix B to 10
6 C.F.R. part 50 since November 1, 1981.

7 23. For each and every major subcontractor for
8 Diablo Canyon Units 1 and 2, state specifically each and
9 every fact you rely on as a basis for your allegation that
10 each such subcontractor's design quality assurance program
11 failed to comply with criterion 16 of Appendix B to 10
12 C.F.R. part 50 since November 1, 1981.

13 24. For each and every major subcontractor for
14 Diablo Canyon Units 1 and 2, state specifically each and
15 every fact you rely on as a basis for your allegation that
16 each such subcontractor's design quality assurance program
17 failed to comply with criterion 17 of Appendix B to 10
18 C.F.R. part 50 since November 1, 1981.

19 25. For each and every major subcontractor for
20 Diablo Canyon Units 1 and 2, state specifically each and
21 every fact you rely on as a basis for your allegation that
22 each such subcontractor's design quality assurance program
23 failed to comply with criterion 18 of Appendix B to 10
24 C.F.R. part 50 since November 1, 1981.

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1 26. State specifically each and every fact you
2 rely on as a basis for your allegation that the licensee's
3 design quality assurance program for Diablo Canyon Units 1
4 and 2 failed to comply with criterion 1 of Appendix B to 10
5 C.F.R. part 50 since November 1, 1981.

6 27. State specifically each and every fact you
7 rely on as a basis for your allegation that the licensee's
8 design quality assurance program for Diablo Canyon Units 1
9 and 2 failed to comply with criterion 2 of Appendix B to 10
10 C.F.R. part 50 since November 1, 1981.

11 28. State specifically each and every fact you
12 rely on as a basis for your allegation that the licensee's
13 design quality assurance program for Diablo Canyon Units 1
14 and 2 failed to comply with criterion 3 of Appendix B to 10
15 C.F.R. part 50 since November 1, 1981.

16 29. State specifically each and every fact you
17 rely on as a basis for your allegation that the licensee's
18 design quality assurance program for Diablo Canyon Units 1
19 and 2 failed to comply with criterion 4 of Appendix B to 10
20 C.F.R. part 50 since November 1, 1981.

21 30. State specifically each and every fact you
22 rely on as a basis for your allegation that the licensee's
23 design quality assurance program for Diablo Canyon Units 1
24 and 2 failed to comply with criterion 5 of Appendix B to 10
25 C.F.R. part 50 since November 1, 1981.

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1 31. State specifically each and every fact you
2 rely on as a basis for your allegation that the licensee's
3 design quality assurance program for Diablo Canyon Units 1
4 and 2 failed to comply with criterion 6 of Appendix B to 10
5 C.F.R. part 50 since November 1, 1981.

6 32. State specifically each and every fact you
7 rely on as a basis for your allegation that the licensee's
8 design quality assurance program for Diablo Canyon Units 1
9 and 2 failed to comply with criterion 7 of Appendix B to 10
10 C.F.R. part 50 since November 1, 1981.

11 33. State specifically each and every fact you
12 rely on as a basis for your allegation that the licensee's
13 design quality assurance program for Diablo Canyon Units 1
14 and 2 failed to comply with criterion 10 of Appendix B to 10
15 C.F.R. part 50 since November 1, 1981.

16 34. State specifically each and every fact you
17 rely on as a basis for your allegation that the licensee's
18 design quality assurance program for Diablo Canyon Units 1
19 and 2 failed to comply with criterion 16 of Appendix B to 10
20 C.F.R. part 50 since November 1, 1981.

21 35. State specifically each and every fact you
22 rely on as a basis for your allegation that the licensee's
23 design quality assurance program for Diablo Canyon Units 1
24 and 2 failed to comply with criterion 17 of Appendix B to 10
25 C.F.R. part 50 since November 1, 1981.

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1 36. State specifically each and every fact you
2 rely on as a basis for your allegation that the licensee's
3 design quality assurance program for Diablo Canyon Units 1
4 and 2 failed to comply with criterion 18 of Appendix B to 10
5 C.F.R. part 50 since November 1, 1981.

6 37. List specifically each and every licensee
7 commitment set forth in the Diablo Canyon FSAR which you
8 allege has not been achieved as a result of the licensee's
9 design quality assurance program since November 1, 1981.

10 38. State specifically each and every fact upon
11 which you base your allegation that the licensee's design
12 quality assurance program since November 1, 1981 has caused
13 commitments in the Diablo Canyon FSAR not to be achieved.

14 39. List specifically each and every license
15 commitment set forth in the Diablo Canyon FSAR which you
16 allege has not been achieved as a result of major
17 subcontractors' design quality assurance programs since
18 November 1, 1981.

19 40. List specifically each and every portion of
20 the licensee's design quality assurance program from
21 November 1, 1981 to the present which you believe is
22 deficient.

23 41. State each and every fact upon which you base
24 your judgment regarding deficiency as to each such portion
25 of licensee's design quality assurance program.

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1 42. List specifically each and every implementing
2 procedure of the licensee's design quality assurance program
3 from November 1, 1981 to the present which you believe to be
4 deficient.

5 43. State each and every fact upon which you base
6 your judgment regarding each such deficiency for each such
7 implementing procedure of the licensee's design quality
8 assurance program.

9 44. For each and every major subcontractor for
10 Diablo Canyon Units 1 and 2 since November 1, 1981, list
11 specifically each and every portion of each such
12 subcontractor's design quality assurance program which you
13 believe to be deficient.

14 45. State each and every fact upon which you base
15 your judgment regarding each such deficiency for each such
16 portion of each such subcontractor's design quality
17 assurance program.

18 46. For each and every major subcontractor for
19 Diablo Canyon Units 1 and 2 since November 1, 1981, list
20 specifically each and every implementing procedure of each
21 such subcontractor's design quality assurance program which
22 you believe to be deficient.

23 47. State each and every fact upon which you base
24 your judgment regarding each such deficiency for each such
25 implementing procedure of each such subcontractor's design
26 quality assurance program.

1 48. Do you believe there are any of the 18
2 criteria of Appendix B to 10 C.F.R. part 50 which the
3 licensee's design quality assurance program does not
4 address?

5 If so, please list each such criterion.

6 49. Do you believe there are any of the 18
7 criteria of Appendix B to 10 C.F.R. part 50 which any of the
8 major subcontractor's design quality assurance programs do
9 not address?

10 If so, for each such subcontractor, list each
11 such criterion.

12 50. State each and every fact upon which you base
13 your allegation that the scope of the IDVP's review of the
14 seismic design of safety related SS&Cs is too narrow.

15 51. Please identify each and every document which
16 you claim supports each fact set forth in the preceding
17 response and correlate each such document as specifically as
18 possible (page and paragraph number) with each such fact.

19 52. State each and every fact upon which you base
20 your allegation that the IDVP did not verify samples from
21 each of the seismic design activities.

22 53. Please identify each and every document which
23 you claim supports each fact set forth in the preceding
24 response and correlate each such document as specifically as
25 possible (page and paragraph number) with each such fact.

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1 54. State each and every fact upon which you base
2 your allegation that the IDVP did not verify samples from
3 each of the design groups in the design chain performing the
4 seismic design activities it did review.

5 55. Please identify each and every document which
6 you claim supports each fact set forth in the preceding
7 response and correlate each such document as specifically as
8 possible (page and paragraph number) with each such fact.

9 56. State each and every fact upon which you base
10 your allegation that the IDVP did not verify samples from
11 each of the non-seismic design activities.

12 57. Please identify each and every document which
13 you claim supports each fact set forth in the preceding
14 response and correlate each such document as specifically as
15 possible (page and paragraph number) with each such fact.

16 58. State each and every fact upon which you base
17 your allegation that the IDVP did not verify samples from
18 each of the design groups in the design chain that performed
19 the non-seismic design activities it did review.

20 59. Please identify each and every document which
21 you claim supports each fact set forth in the preceding
22 response and correlate each such document as specifically as
23 possible (page and paragraph number) with each such fact.

24 60. State each and every fact upon which you base
25 your allegation that the number of samples obtained for the
26 non-seismic design activities the IDVP did verify are

1 insufficient to provide mathematically verifiable
2 conclusions about even those activities.

3 61. Please identify each and every document which
4 you claim supports each fact set forth in the preceding
5 response and correlate each such document as specifically as
6 possible (page and paragraph number) with each such fact.

7 62. State each and every fact upon which you base
8 your allegation that the IDVP has accepted substitution of
9 mean measured performance of structures and materials in
10 lieu of code-specified minima.

11 63. Please identify each and every document which
12 you claim supports each fact set forth in the preceding
13 response and correlate each such document as specifically as
14 possible (page and paragraph number) with each such fact.

15 64. State each and every fact upon which you base
16 your allegation that the IDVP has accepted deviations from
17 the equipment standards set forth in PG&E's license
18 commitments without providing an adequate engineering
19 justification for the change.

20 65. Please identify each and every document which
21 you claim supports each fact set forth in the preceding
22 response and correlate each such document as specifically as
23 possible (page and paragraph number) with each such fact.

24 66. State each and every fact upon which you base
25 your allegation that the IDVP has failed to ascertain the
26 root cause of the deviation from PG&E's license commitments

1 and the regulatory requirements that it was and is
2 discovering.

3 67. Please identify each and every document which
4 you claim supports each fact set forth in the preceding
5 response and correlate each such document as specifically as
6 possible (page and paragraph number) with each such fact.

7 68. State each and every fact upon which you base
8 your allegation that the IDVP has failed to verify indepen-
9 dently that all safety related structures, systems, and com-
10 ponents at Diablo Canyon meet PG&E's licensing commitments.

11 69. Please identify each and every document which
12 you claim supports each fact set forth in the preceding
13 response and correlate each such document as specifically as
14 possible (page and paragraph number) with each such fact.

15 70. State each and every fact upon which you base
16 your allegation that the IDVP has performed no independent
17 verifications, but has merely checked data inputs to models
18 used by PG&E.

19 71. Please identify each and every document which
20 you claim supports each fact set forth in the preceding
21 response and correlate each such document as specifically as
22 possible (page and paragraph number) with each such fact.

23 72. State each and every fact upon which you base
24 your allegation that the IDVP has failed to verify that
25 modeling by PG&E of soils properties for the containment
26 building is justified and proper.

1 73. Please identify each and every document which
2 you claim supports each fact set forth in the preceding
3 response and correlate each such document as specifically as
4 possible (page and paragraph number) with each such fact.

5 74. State each and every fact upon which you base
6 your allegation that the IDVP has failed to verify PG&E's
7 computations for modes in the containment building having
8 frequencies between 20 and 33 HZ.

9 75. Please identify each and every document which
10 you claim supports each fact set forth in the preceding
11 response and correlate each such document as specifically as
12 possible (page and paragraph number) with each such fact.

13 76. State each and every fact upon which you base
14 your allegation that the IDVP has failed to verify that use
15 of inconsistent seismic techniques of modeling of accelera-
16 tions, displacements, and shell forces in the containment
17 building is justifiable and proper.

18 77. Please identify each and every document which
19 you claim supports each fact set forth in the preceding
20 response and correlate each such document as specifically as
21 possible (page and paragraph number) with each such fact.

22 78. State each and every fact upon which you base
23 your allegation that the IDVP has failed to verify that
24 failure by PG&E to use two horizontal components in its
25 seismic modeling of the containment building for the DE and
26 DDE, as it did for the Hosgri, is justifiable and proper.

1 79. Please identify each and every document which
2 you claim supports each fact set forth in the preceding
3 response and correlate each such document as specifically as
4 possible (page and paragraph number) with each such fact.

5 80. State each and every fact upon which you base
6 your allegation that the IDVP failed to verify that use by
7 PG&E of inappropriate and potentially dangerous stress
8 factors and load factors for steel still used in the
9 containment building, is justifiable and proper.

10 81. Please identify each and every document which
11 you claim supports each fact set forth in the preceding
12 response and correlate each such document as specifically as
13 possible (page and paragraph number) with each such fact.

14 82. State each and every fact upon which you base
15 your allegation that the IDVP has failed to verify that
16 PG&E's failure to specify all damping values used in
17 modeling of each mode in the containment building, is
18 justifiable and proper.

19 83. Please identify each and every document which
20 you claim supports each fact set forth in the preceding
21 response and correlate each such document as specifically as
22 possible (page and paragraph number) with each such fact.

23 84. State each and every fact upon which you base
24 your allegation that the IDVP has failed to verify that the
25 values used by PG&E in modeling soils properties for the
26 auxiliary building are correct and properly used.

1 85. Please identify each and every document which
2 you claim supports each fact set forth in the preceding
3 response and correlate each such document as specifically as
4 possible (page and paragraph number) with each such fact.

5 86. State each and every fact upon which you base
6 your allegation that the IDVP has failed to verify that all
7 damping factors used by PG&E in modeling of the DE for
8 auxiliary buildings are conservative and proper.

9 87. Please identify each and every document which
10 you claim supports each fact set forth in the preceding
11 response and correlate each such document as specifically as
12 possible (page and paragraph number) with each such fact.

13 88. State each and every fact upon which you base
14 your allegation that the IDVP has failed to verify that all
15 stress values for concrete in shear walls used by PG&E in
16 modeling the auxiliary building are conservative and proper.

17 89. Please identify each and every document which
18 you claim supports each fact set forth in the preceding
19 response and correlate each such document as specifically as
20 possible (page and paragraph number) with each such fact.

21 90. State each and every fact upon which you base
22 your allegation that the IDVP has failed to verify that
23 PG&E's modeling of the crane in the turbine building at full
24 load is complete, covers all cases, and is conservative and
25 proper.

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1 91. Please identify each and every document which
2 you claim supports each fact set forth in the preceding
3 response and correlate each such document as specifically as
4 possible (page and paragraph number) with each such fact.

5 92. State each and every fact upon which you base
6 your allegation that the IDVP has failed to verify that
7 PG&E's use of the double algebraic sum method of
8 calculation, rather than the square root of the sum of the
9 squares method, is justifiable and properly done.

10 93. Please identify each and every document which
11 you claim supports each fact set forth in the preceding
12 response and correlate each such document as specifically as
13 possible (page and paragraph number) with each such fact.

14 94. State each and every fact upon which you base
15 your allegation that the IDVP has failed to verify that
16 PG&E's modeling of torsion factors by differing techniques
17 for different buildings is conservative and properly done.

18 95. Please identify each and every document which
19 you claim supports each fact set forth in the preceding
20 response and correlate each such document as specifically as
21 possible (page and paragraph number) with each such fact.

22 96. State each and every fact upon which you base
23 your allegation that the IDVP has failed to verify how
24 hydrodynamic forces were computed by PG&E in its modeling of
25 the intake structure, and that such computation was properly
26 and correctly done.

1 97. Please identify each and every document which
2 you claim supports each fact set forth in the preceding
3 response and correlate each such document as specifically as
4 possible (page and paragraph number) with each such fact.

5 98. State each and every fact upon which you base
6 your allegation that the IDVP has failed to verify that
7 PG&E's use in modeling the intake structure of different
8 models for non-linear vertical dynamic amplification and for
9 horizontal seismic loading, and PG&E's method of combining
10 their responses, are justifiable and properly done.

11 99. Please identify each and every document which
12 you claim supports each fact set forth in the preceding
13 response and correlate each such document as specifically as
14 possible (page and paragraph number) with each such fact.

15 100. State each and every fact upon which you base
16 your allegation that the IDVP has failed to verify that PG&E's
17 use of ductility factors for steel and concrete in modeling
18 the intake structure is conservative and properly done.

19 101. Please identify each and every document which
20 you claim supports each fact set forth in the preceding
21 response and correlate each such document as specifically as
22 possible (page and paragraph number) with each such fact.

23 102. State each and every fact upon which you base
24 your allegation that the standards which the IDVP utilized
25 to determine whether the non-seismic design activities it
26 reviewed met PG&E's license commitments were improper.

1 103. Please identify each and every document which
2 you claim supports each fact set forth in the preceding
3 response and correlate each such document as specifically as
4 possible (page and paragraph number) with each such fact.

5 104. State each and every fact upon which you base
6 your allegation that the IDVP has accepted deviations from
7 the equipment standards set forth in PG&E's license
8 commitments without providing an adequate engineering
9 justification for the changes.

10 105. Please identify each and every document which
11 you claim supports each fact set forth in the preceding
12 response and correlate each such document as specifically as
13 possible (page and paragraph number) with each such fact.

14 106. State each and every fact upon which you base
15 your allegation that the IDVP has failed to ascertain the
16 root cause of the deviations from PG&E's license commitments
17 that it was and is discovering.

18 107. Please identify each and every document which
19 you claim supports each fact set forth in the preceding
20 response and correlate each such document as specifically as
21 possible (page and paragraph number) with each such fact.

22 108. State each and every fact upon which you base
23 your allegation that the IDVP has no systematic program for
24 verifying that the design of equipment supplied to PG&E from
25 its subcontractors met PG&E's license commitments for such
26 equipment.

1 109. Please identify each and every document which
2 you claim supports each fact set forth in the preceding
3 response and correlate each such document as specifically as
4 possible (page and paragraph number) with each such fact.

5 110. State each and every fact upon which you base
6 your allegation that the IDVP has failed to verify whether
7 equipment and components supplied to PG&E by PG&E's
8 subcontractors met all seismic design requirements.

9 111. Please identify each and every document which
10 you claim supports each fact set forth in the preceding
11 response and correlate each such document as specifically as
12 possible (page and paragraph number) with each such fact.

13 112. State each and every fact upon which you base
14 your allegation that the IDVP has failed to verify whether
15 equipment supplied to PG&E by PG&E's subcontractors met all
16 non-seismic design requirements.

17 113. Please identify each and every document which
18 you claim supports each fact set forth in the preceding
19 response and correlate each such document as specifically as
20 possible (page and paragraph number) with each such fact.

21 114. State each and every fact upon which you base
22 your allegation that the IDVP has failed to require PG&E to
23 implement a corrective and preventative action program that
24 is sufficient to assure that the seismic design deficiencies
25 that have been uncovered do not exist in other unexamined

26 ///

1 portions of the plant or will not be repeated in future
2 design documents.

3 115. Please identify each and every document which
4 you claim supports each fact set forth in the preceding
5 response and correlate each such document as specifically as
6 possible (page and paragraph number) with each such fact.

7 116. State each and every fact upon which you base
8 your allegation that the IDVP has failed to look for the
9 root cause of the discrepancies it has found in the seismic
10 design.

11 117. Please identify each and every document which
12 you claim supports each fact set forth in the preceding
13 response and correlate each such document as specifically as
14 possible (page and paragraph number) with each such fact.

15 118. State each and every fact upon which you base
16 your allegation that the IDVP has failed to recognize the
17 generic nature of a number of the seismic design
18 discrepancies uncovered.

19 119. Please identify each and every document which
20 you claim supports each fact set forth in the preceding
21 response and correlate each such document as specifically as
22 possible (page and paragraph number) with each such fact.

23 120. State each and every fact upon which you base
24 your allegation that the IDVP has failed to require PG&E to
25 implement a corrective and preventative action program that
26 is sufficient to assure that the non-seismic design

1 deficiencies that have been uncovered do not exist in other,
2 unexamined portions of the plant or will not be repeated in
3 future design documents.

4 121. Please identify each and every document which
5 you claim supports each fact set forth in the preceding
6 response and correlate each such document as specifically as
7 possible (page and paragraph number) with each such fact.

8 122. State each and every fact upon which you base
9 your allegation that the IDVP has failed to look for the
10 root cause of the discrepancies it has found in non-seismic
11 design.

12 123. Please identify each and every document which
13 you claim supports each fact set forth in the preceding
14 response and correlate each such document as specifically as
15 possible (page and paragraph number) with each such fact.

16 124. State each and every fact upon which you base
17 your allegation that the IDVP has failed to recognize the
18 generic nature of a number of the non-seismic design
19 deficiencies uncovered.

20 125. Please identify each and every document which
21 you claim supports each fact set forth in the preceding
22 response and correlate each such document as specifically as
23 possible (page and paragraph number) with each such fact.

24 126. State each and every fact upon which you base
25 your allegation that the IDVP has failed to require PG&E to
26 implement a corrective and preventative action program that

1 is sufficient to assure the deficiencies in the design
2 documents of its equipment subcontractors do not exist in
3 the design documents of contractors whose work was not
4 examined and will not occur in the design work of future
5 subcontractors.

6 127. Please identify each and every document which
7 you claim supports each fact set forth in the preceding
8 response and correlate each such document as specifically as
9 possible (page and paragraph number) with each such fact.

10 128. State each and every fact upon which you base
11 your allegation that the IDVP has no systematic program for
12 reviewing whether the seismic design modifications it has
13 requested that PG&E perform have occurred.

14 129. Please identify each and every document which
15 you claim supports each fact set forth in the preceding
16 response and correlate each such document as specifically as
17 possible (page and paragraph number) with each such fact.

18 130. State each and every fact upon which you base
19 your allegation that the IDVP has no systematic program for
20 reviewing whether the non-seismic design modifications it
21 has requested that PG&E perform have occurred.

22 131. Please identify each and every document which
23 you claim supports each fact set forth in the preceding
24 response and correlate each such document as specifically as
25 possible (page and paragraph number) with each such fact.

26 ///

1 132. State each and every fact upon which you base
2 your allegation that PG&E's Internal Technical Program ("ITP")
3 does not provide assurance, equivalent to Appendix B compli-
4 ance, that PG&E has and will meet its license commitments for
5 the seismic design of SS&C's at Diablo Canyon.

6 133. Please identify each and every document which
7 you claim supports each fact set forth in the preceding
8 response and correlate each such document as specifically as
9 possible (page and paragraph number) with each such fact.

10 134. State each and every fact upon which you base
11 your allegation that PG&E and its major subcontractors
12 failed to develop and implement in a timely fashion a QA/QC
13 program for the design of important to safety but not safety
14 related SS&Cs at Diablo Canyon which met (and meet) the
15 requirements of GDC-1 of Appendix A to 10 C.F.R. part 50
16 ("Appendix A").

17 135. Please identify each and every document which
18 you claim supports each fact set forth in the preceding
19 response and correlate each such document as specifically as
20 possible (page and paragraph number) with each such fact.

21 136. State each and every fact upon which you base
22 your allegation that the IDVP has not and will not provide
23 any assurance, equivalent to Appendix A compliance, that the
24 design of important to safety but not safety related SS&Cs
25 at Diablo Canyon meets the regulatory requirements for the
26 design of such equipment.

1 137. Please identify each and every document which
2 you claim supports each fact set forth in the preceding
3 response and correlate each such document as specifically as
4 possible (page and paragraph number) with each such fact.

5 138. For each even numbered interrogatory from
6 number 50 through number 130, state specifically (section #,
7 page and line, etc.) where in the regulations, the
8 Commission order of November 19, 1981, the Denton letter of
9 November 19, 1981, or the IDVP's Phase I and II program
10 plans that the activity (or lack thereof) by the IDVP you
11 allege did (or did not) take place is required to take (or
12 not take) place.

13 139. Define "root cause" as used in your proposed
14 contention II A 1(c).

15 140. Define "equipment standards" as used in your
16 proposed contention II B 1(b).

17 141. Please list each and every "equipment
18 standard" set forth in PG&E's license commitments which you
19 believe the IDVP has accepted deviations from.

20 142. Define "torsion factors" as used in your
21 proposed contention II B 1(q).

22 143. Define "hydrodynamic forces" as used in your
23 proposed contention II B 1 (r).

24 144. Define "generic nature" as used in your
25 proposed contention II C 1(b).

26 ///

1 142. Please list each regulation, or regulatory
2 guide, by specific section and/or subsection, which requires
3 the identification of a "root" cause when a deviation
4 occurs, or at any time, or which defines "root cause."

5 143. For each answer to these interrogatories, and
6 all subparts thereto, identify each person who participated
7 in the preparation of your answers pursuant to 10 C.F.R.
8 § 2.740b(b).

9
10 Respectfully submitted,

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 Attorneys for
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23 By Bruce Norton
24 Bruce Norton

25
26 DATED: July 27, 1983.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

Docket No. 50-275
Docket No. 50-323



CERTIFICATE OF SERVICE

The foregoing document(s) of Pacific Gas and Electric Company has (have) been served today on the following by deposit in the United States mail, properly stamped and addressed:

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US Nuclear Regulatory Commission
Washington DC 20555

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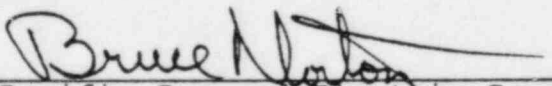
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