

RECEIVED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety & Licensing Board



In The Matter Of )  
PACIFIC GAS & ELECTRIC COMPANY )  
(Diablo Canyon Nuclear Power Plant, )  
Units 1 & 2) )

Docket Nos. 50-275 OL  
50-323 OL

INTERVENORS' REQUEST TO THE STAFF FOR  
PRODUCTION OF DOCUMENTS,  
DATED SEPTEMBER 27, 1978

Pursuant to 10 CFR §2.744(a), Intervenors, SCENIC SHORE-  
LINE PRESERVATION CONFERENCE, INC., SAN LUIS OBISPO MOTHERS  
FOR PEACE, SANDRA SILVER, ECOLOGY ACTION CLUB, and JOHN J.  
FORSTER, request the Staff to produce all documents identified  
in response to Interrogatories number 2b, 2c, 2f, 3d, 3g,  
4, 5, 6, 7, 8, 9, 10, 11, 12, and 13, in INTERVENORS'  
INTERROGATORIES TO THE STAFF, DATED SEPTEMBER 27, 1978 which  
have not previously been made available to Intervenors or  
filed in the public documents room. These documents are  
relevant to the issues raised in the contentions relating  
to the adequacy of Diablo Canyon's seismic design.

Respectfully submitted,

7810160155 G

September 27, 1978

John Phillips, Esq.  
David S. Fleischaker, Esq.  
Attorneys For  
Center For Law In The Public Interest

By: David S. Fleischaker  
DAVID S. FLEISCHAKER, ESQ.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety & Licensing Board



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In The Matter Of	)	
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PACIFIC GAS & ELECTRIC COMPANY	)	Docket Nos. 50-275 OL
	)	50-323 OL
(Diablo Canyon Nuclear Power Plant,)	)	
Units 1 & 2)	)	

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INTERVENORS' REQUEST TO THE APPLICANT  
FOR PRODUCTION OF DOCUMENTS, DATED SEPTEMBER 27, 1978

Pursuant to 10 CFR §2.741, Intervenor, SCENIC SHORE-  
LINE PRESERVATION CONFERENCE, INC., SAN LUIS OBSIPO MOTHERS  
FOR PEACE, SANDRA SILVER, ECOLOGY ACTION CLUB and JOHN J.  
FORSTER request that Pacific Gas & Electric Company produce  
all documents identified in response to Interrogatories  
number 2b, 2c, 2f, 3d, 3g, 3h, 4, 5, 6, 7, 8, and 9 in  
INTERVENORS' INTERROGATORIES TO THE APPLICANT, DATED  
SEPTEMBER 27, 1978 which have not previously been made  
available to Intervenor or filed in the public documents  
room.

Respectfully submitted,

John Phillips, Esq.  
David S. Fleischaker, Esq.

Attorneys For  
Center For Law In The Public Interest

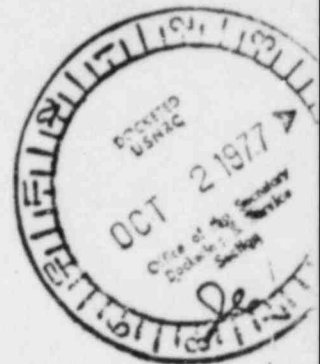
September 27, 1978

By:

David S. Fleischaker  
David S. Fleischaker, Esq.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety & Licensing Board



In The Matter Of	)	
	)	
PACIFIC GAS & ELECTRIC COMPANY	)	Docket Nos. 50-275 OL
	)	50-323 OL
(Diablo Canyon Nuclear Power Plant,)	)	
Units 1 & 2)	)	

INTERVENORS' REQUEST FOR ENLARGEMENT OF TIME  
TO FILE INTERROGATORIES

The Licensing Board established September 27, 1978 as the cutoff date for filing Interrogatories. Intervenor hereby request an enlargement of time of one week, until October 3, 1978, in which to submit their final set of Interrogatories.

1. On September 21, 1978, Intervenor received copies of 12 memorandum from Dennis P. Allison to John F. Stoltz describing data submitted informally to the Staff by the Applicant last spring announcing that the data was now available in the public documents room. Intervenor have yet to complete their review of this data. Additional interrogatories may be required upon completion of that review.

2. The Intervenor are preparing a final set of Interrogatories for both the Staff and Applicant, but due to conflicting obligations, Intervenor's counsel has not been

able to complete those Interrogatories. These obligations include completion of depositions under order from the Federal District Court and recent arguments before State Courts.

3. Answers to Interrogatories would be due October 24, 1978. Intervenors do not anticipate that this enlargement of time would result in any further disruption of the hearing schedule established in the Licensing Board's Order, dated August 8, 1978.

Wherefore, Intervenors request an enlargement of time of one week, until October 3, 1978, in which to submit their final set of Interrogatories.

Respectfully submitted,

John Phillips, Esq.  
David S. Fleischaker, Esq.

Attorneys For  
Center For Law In The Public Interest

By: David S. Fleischaker  
David S. Fleischaker, Esq.

September 27, 1978

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety & Licensing Board



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In The Matter Of )  
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PACIFIC GAS & ELECTRIC COMPANY )  
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(Diablo Canyon Nuclear Power Plant, )  
Units 1 & 2 )

Docket Nos. 50-275 OL  
50-323 OL

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INTERVENORS' INTERROGATORIES TO THE APPLICANT,  
DATED SEPTEMBER 27, 1978  
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Pursuant to 10 C.F.R. §2.740(b), Intervenor SCENIC  
SHORELINE PRESERVATION CONFERENCE, INC., SAN LUIS OBISPO  
MOTHERS FOR PEACE, SANDRA SILVER, ECOLOGY ACTION CLUB and  
JOHN J. FORSTER request Pacific Gas & Electric Company  
(Applicant) to answer the interrogatories set out below.

Instructions

1. Each interrogatory is to be answered separately  
and fully in writing under oath or affirmation by the officer  
of, employee of, or consultant to the Applicant who has  
personal knowledge thereof.
2. In case of an objection, the reasons for the objec-  
tion shall be stated in full.
3. Answers to these interrogatories are due October  
17, 1978

1. For each of the contentions relating to the adequacy of the seismic design of the Diablo Canyon Nuclear Power Plant, identify each witness the Applicant intends to call in the licensing hearing.
2. For each and every person identified in response to interrogatory number (1) above, identify the following:
  - a) the substance of the facts and opinions to which the witness is expected to testify;
  - b) the grounds for each opinion;
  - c) all documents, and portions thereof, to which each expert will refer or upon which he will rely in the licensing hearing. If reference is made to the SER or FSAR and any amendments thereof, identify the specific section upon which each witness will rely;
  - d) each witnesses' educational background;
  - e) any professional employment or other work experience relating to the area of expertise upon which each witness will rely;
  - f) all articles, books, scientific papers or abstracts, studies, analysis authored by the witnesses and relating to the area of expertise upon which each witness will rely.
3.
  - a) Does the Applicant know what a three dimensional soil structure interaction analysis is?
  - b) Describe a three dimensional soil structure interaction analysis.



- c) Has the Applicant or any of its consultants performed a three dimensional soil structure interaction analysis on the Diablo Canyon Nuclear Power Plant?
- d) If so, please describe the results of that analysis and identify all documents that contain the results of such analysis.
- e) If the Applicant has not performed such analysis, state why they have not.
- f) To the Applicant's knowledge, has the Staff or any of its consultants performed a three dimensional soil structure interaction analysis on the Diablo Canyon Nuclear Power Plant?
- g) If so, has the Applicant had the opportunity to review the results of that analysis? If the Applicant has reviewed the results of such analysis, summarize those results. Identify any documents that contain the results of such analysis.
- h) Has the Applicant ever discussed with the Staff the need to perform a three dimensional soil structure interaction analysis on the Diablo Canyon Nuclear Power Plant? If so, please summarize those discussions. Identify any rules or memorandum relating to such discussions.
- i) Is the Applicant aware of any person who has performed or has allegedly performed a three dimensional

soil structure interaction analysis on the Diablo Canyon Nuclear Power Plant? If so, please identify each person.

4. Identify all documents upon which the Applicant will rely for estimating peak parameters of a 7.5 magnitude earthquake at short distances. If the SER or FSAR is cited, please provide the section number.

5. Identify all documents upon which the Applicant will rely to support the reduction of the peak acceleration as measured in the free field to an "effective acceleration." If the SER or FSAR is cited, please provide the section number.

6. Identify all documents upon which the Applicant will rely to support use of a tau effect to reduce by varying amounts the design response spectra for those structures of the Diablo Canyon Nuclear Power Plant having foundations extending over large areas. If the SER or FSAR is cited, please provide the section number.

7. Identify all documents upon which the Applicant will rely for the selection of peak acceleration, velocity, duration and displacement parameters that describe the safe shutdown earthquake for the Diablo Canyon Nuclear Power Plant. If the SER or FSAR is cited, please provide the section number.

8. Identify any documents, including notes, letters and



5.

memorandum, that describe, summarize or report any meetings between Staff consultant, Dr. Nathan Newmark, and Applicant employees or consultants during the course of reanalysis. Reference is made to the meeting of March 13, 1978, as well as any other meeting.

9. Identify all documents, notes, memorandum and reports relating to or reporting on, or issuing from the Diablo Canyon Seismic Research Program (SRP). See Attachment 1.

Respectfully submitted,

John Phillips, Esq.  
David S. Fleischaker, Esq.

Attorneys For  
Center For Law In The Public Interest

By:

David S. Fleischaker  
David S. Fleischaker, Esq.

September 27, 1978

CENTRAL FILE  
ENGINEERING DEPARTMENT420- Diablo Canyon  
Site

September 27, 1977

Dr. B. Bolt  
Dr. A. Cornell  
Mr. D. Hamilton  
Dr. H. Seed  
Dr. S. SmithDiablo Canyon Seismic Research Program (SRP) Coordination

The purpose of the Diablo Canyon SRP is to reappraise the ground motion characteristics and the Hosgri Fault's potential on the site, and to refine the dynamic analysis of the plant to provide realistic assessments of the effect of the reappraised ground motion.

The Diablo Canyon SRP will be coordinated by a team. The composition of this team and the flow of information to PG&E and to consultants is shown on the attached organizational chart.

The SRP coordinator will issue bi-weekly and bi-monthly reports. The first bi-weekly report was sent to you, as an example, on September 16, 1977. The bi-weekly reports will primarily deal with routine matters of the research, and will not attempt to report on critical assumptions and significant results. In the future, therefore, only the bi-monthly reports, which will report on the findings of the research in greater detail, will be sent to you. It is hoped that these bi-monthly reports will keep you adequately informed. However, should you need additional information, please call us.

Please consider all matters of the Diablo Canyon SRP confidential.

The first bi-monthly progress report will be issued by the SRP coordinator shortly.

Sincerely,

R. V. BETTINGER

R. V. Bettinger  
Chief Civil Engineer

GCL/EJHovland/jmc

cc: Mr. G. Gangloff  
Dr. T. Esselman  
Dr. M. Keaton  
Dr. C. Prazier  
Dr. J. Blume  
Dr. D. JhaveriMr. G. C. Lanfeste  
Mr. E. P. Wollak/Mr. V. J. Chio  
Mr. P. A. Crane  
Mr. M. Furbush  
Mr. J. B. Hoch  
Mr. J. O. Schuyler  
Mr. A. B. Schuurman

P D 03364

NUCLEAR PROJECTS  
PROJECT ENGINEER-DIABLO CANYON

H20-

Diablo Canyon Seismic  
Research Program

*Site*

August 29, 1977

MESSRS. H. J. GORMLY  
D. NIELSEN  
E. P. WOLLAK

This is to confirm that Mr. George C. Lenfestey is responsible for coordinating the Diablo Canyon Seismic Research Program (formally called Long Term Studies) and will report to me for project direction. He will be assisted in this effort by Mr. John H. Hovland.

J. B. HOCH

Approved: R. V. BETTINGER  
R. V. Bettinger

JOS (3096):dap

cc: GEaster  
RVBettinger  
PACrane  
MHFurbush  
WRJohnson  
DVKelly  
JJMcCann  
GVRichards  
FFMautz  
JHHovland  
GCLenfestey

P D 03368

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety & Licensing Board

In The Matter Of )  
 )  
PACIFIC GAS & ELECTRIC COMPANY ) Docket Nos. 50-275 OL  
 ) 50-323 OL  
(Diablo Canyon Nuclear Power Plant,) )  
Units 1 & 2) )

INTERVENORS' INTERROGATORIES TO THE STAFF,  
DATED SEPTEMBER 27, 1978

Pursuant to 10 CRF §2.720(h)(2)(ii), Intervenors hereby file written interrogatories to be answered by NRC personnel with knowledge of the facts designated by the Executive Director for Operations. Answers to the interrogatories are necessary for a proper decision in this proceeding and are not reasonably obtainable from any other sources.

1. For each of the contentions relating to the adequacy of the seismic design of the Diablo Canyon Nuclear Power Plant, identify each witness the Staff intends to call in the licensing hearing.

2. For each and every person identified in response to interrogatory number (1) above, identify the following:

- a) the substance of the facts and opinions to which the witness is expected to testify;
- b) the grounds for each opinion;
- c) all documents, and portions thereof, to which

each expert will refer or upon which he will rely in the licensing hearing. If reference is made to the SER or FSAR and any amendments thereof, identify the specific section upon which each witness will rely;

d) each witnesses' educational background;

e) any professional employment or other work experience relating to the area of expertise upon which each witness will rely;

f) all articles, books, scientific papers or abstracts, studies, analysis authored by the witnesses and relating to the area of expertise upon which each witness will rely.

3. a) Does the Staff know what a three dimensional soil structure interaction analysis is?

b) Describe a three dimensional soil structure interaction analysis.

c) Has the Staff or any of its consultants performed a three dimensional soil structure interaction analysis on the Diablo Canyon Nuclear Power Plant?

d) If so, please describe the results of that analysis and identify all documents that contain the results of such analysis.

e) If the Staff has not performed such analysis, state why they have not.

f) To the Staff's knowledge, has the Applicant or any of its consultants performed a three dimensional soil

structure interaction analysis on the Diablo Canyon Nuclear Power Plant?

g) If so, has the Staff had the opportunity to review the results of that analysis? If the Staff has reviewed the results of such analysis, summarize those results. Identify any documents that contain the results of such analysis.

h) Has the Staff ever discussed with the Applicant the need to perform a three dimensional soil structure interaction analysis on the Diablo Canyon Nuclear Power Plant? If so, please summarize those discussions. Identify any notes or memorandum relating to such discussions.

i) Is the Staff aware of any person who has performed or has allegedly performed a three dimensional soil structure interaction analysis on the Diablo Canyon Nuclear Power Plant? If so, please identify each person.

4. Has the USGS provided the NRC with any opinion regarding the selection of 0.75g as the zero period limit for design response spectra used in the reanalysis of the Diablo Canyon Nuclear Power Plant? If so, please identify all documents containing those opinions.

5. Has the USGS provided the NRC with any opinion on the use of the Tau effect to reduce by varying amounts the design



response spectra for those structures of the Diablo Canyon Nuclear Power Plant having foundations extending over large areas? If so, please identify all documents containing those opinions.

6. Has the USGS provided the NRC with any opinions on the damping factors used to reduce the design response spectra for the structures of the Diablo Canyon Nuclear Power Plant? If so, please identify all documents containing those opinions.

7. Identify all documents upon which the Staff will rely for estimating peak parameters of 7.5 magnitude earthquake at short distances. If the SER or FSAR is cited, please provide the section number.

8. Identify all documents upon which the Staff will rely to support the reduction of the peak accelerations as measured in the free field to an "effective acceleration." If the SER or FSAR is cited, please provide the section number.

9. Identify all documents upon which the Staff will rely to support use of a tau effect to reduce by varying amounts the design response spectra for those structures of the Diablo Canyon Nuclear Power Plant having foundations extending over large areas. If the SER or FSAR is cited, please provide the section number.

10. Identify all documents upon which the Staff will rely for the selection of peak acceleration, velocity, duration

and displacement parameters that describe the safe shutdown earthquake for the Diablo Canyon Nuclear Power Plant. If the SER or FSAR is cited, please provide the section number.

11. Identify any documents, including notes, letters and memorandum, that describe, summarize or report any meetings between Staff consultant, Dr. Nathan Newmark, and Applicant employees or consultants during the course of the reanalysis. Reference is made to a meeting on March 13, 1978, as well as any other meeting.

12. a) Describe the data that has become available from the Fugro studies?

b) What conclusions, if any, has the Staff drawn from the Fugro data?

c) If the data has not yet become available, when does the Staff expect it to become available?

13. a) Describe the steps taken, in the presentation of Staff testimony in this proceeding, to assure implementation of the Commission's open door policy about differing professional opinion.

b) Identify those witnesses who will differ significantly in testimony related to the same subject matter. For such witnesses, briefly summarize their testimony and identify each document upon which they will rely or to which they will refer.

6.

Respectfully submitted,

John Phillips, Esq.  
David S. Fleischaker, Esq.

Attorneys For  
Center For Law In The Public Interest

By: David S. Fleischaker  
David S. Fleischaker, Esq.

September 27, 1978

RELATED CORRESPONDENCE  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety & Licensing Board



In The Matter Of )  
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PACIFIC GAS & ELECTRIC COMPANY )  
 )  
(Diablo Canyon Nuclear Power Plant,) )  
Units 1 & 2) )

Docket Nos. 50-275 OL  
50-323 OL

CERTIFICATE OF SERVICE

I hereby certify that I have this 27th day of September 1978 served copies of the foregoing INTERVENORS' INTERROGATORIES TO THE APPLICANT, DATED SEPTEMBER 27, 1978, INTERVENORS' REQUEST TO THE APPLICANT FOR PRODUCTION OF DOCUMENTS, DATED SEPTEMBER 27, 1978, INTERVENORS' INTERROGATORIES TO THE STAFF, DATED SEPTEMBER 27, 1978, INTERVENORS' REQUEST TO THE STAFF FOR PRODUCTION OF DOCUMENTS and INTERVENORS' REQUEST FOR ENLARGEMENT OF TIME TO FILE INTERROGATORIES by depositing copies thereof in the U.S. Mails, first class, postage pre-paid to the following parties:

Elizabeth S. Bowers, Esq.  
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Atomic Safety & Licensing  
Board Panel  
U.S. Nuclear Regulatory  
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