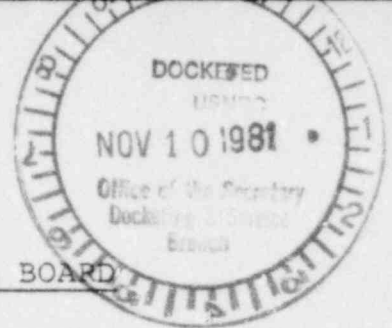


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD



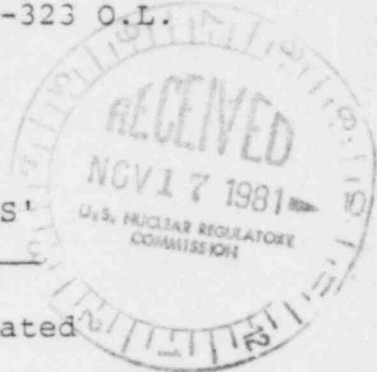
In the Matter of )

PACIFIC GAS AND ELECTRIC COMPANY )

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

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

GOVERNOR BROWN'S SUPPORT FOR JOINT INTERVENORS'  
REQUEST FOR DIRECTED CERTIFICATION



In accordance with the Appeal Board's Order dated October 29, 1981, the Governor submits this pleading in support of Joint Intervenor's Directed Certification Request, dated October 8, 1981.

The Governor will not repeat the arguments which have been made by Joint Intervenor's and documented extensively in their October 8 pleading and attachments thereto. Joint Intervenor's have presented detailed, specific contentions which bear directly on the safety of the Diablo Canyon facility. Further, Joint Intervenor's have addressed and persuasively satisfied the criteria for reopening the record. The Licensing Board, in its August 4, 1981 Memorandum and Order, largely ignored Joint Intervenor's arguments and seriously misapplied the Commission's guidance. The Licensing Board should be reversed and directed to admit Joint Intervenor's clarified contentions in the full power proceeding.

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The Governor offers specific comment on the substance of one of Joint Intervenors' contentions -- that concerning the adverse impact on safety resulting from potential interactions between safety and nonsafety systems.<sup>\*/</sup> Joint Intervenors contend that there is no reasonable assurance of compliance with many General Design Criteria because PG&E has failed to analyze the potential adverse interactions between safety and nonsafety systems at Diablo Canyon.

The Governor agrees that this contention should be admitted and attaches hereto the affidavit of Gregory C. Minor in support thereof. Mr. Minor documents the need for a comprehensive systems interaction analysis of Diablo Canyon. In particular, Mr. Minor demonstrates:

1. Recent events, particularly at TMI, Crystal River and Rancho Seco, document the severe adverse interactions that can occur between safety and nonsafety systems.
2. The limited systems interactions analyses conducted to date for Diablo Canyon identified more than 800 potential adverse interactions. These analyses, however, only covered seismically induced interactions, leaving unanalyzed a wide spectrum of other potential interactions. These other interactions must be analyzed and necessary modifications effected before there can be reasonable assurance that Diablo Canyon can be operated in accordance with regulatory requirements.

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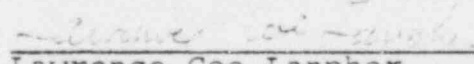
<sup>\*/</sup> See Joint Intervenors' Statement of Clarified Contentions, June 30, 1981, pp. 15-16.

3.

The Governor accordingly urges this Appeal Board to reverse the Licensing Board and to direct admission of Joint Intervenor's Clarified Contentions.

Respectfully submitted,

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November 9, 1981