

13724  
RELATED CORRESPONDENCE

March 12, 1993

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'93 MAR 15 P3:00

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-OLA - 2  
) 50-323-OLA  
) (Construction Period  
) Recovery)  
)  
)

PACIFIC GAS & ELECTRIC COMPANY'S  
RESPONSE TO FIRST SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS FILED  
BY SAN LUIS OBISPO MOTHERS FOR PEACE (RE: CONTENTION I)

Pacific Gas & Electric Company ("PG&E") herein responds to all remaining portions of "Intervenor San Luis Obispo Mothers for Peace First Set of Written Interrogatories and Requests for Production of Documents to Pacific Gas & Electric Company," dated February 16, 1993 ("MFP's First Set").<sup>1/</sup> This response includes answers and objections in accordance with 10 C.F.R. §§ 2.740b(b) and 2.741(d), and specifically addresses in full the portions of MFP's First Set that relate to Contention I (Maintenance).<sup>2/</sup> Facsimile copies of

<sup>1/</sup> For previous responses to other aspects of MFP's First Set, see "Pacific Gas & Electric Company's Response to First Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace (Re: Contention V)," dated March 10, 1993.

<sup>2/</sup> This response is being timely filed in accordance with the schedule for discovery responses adopted by the Atomic Safety and Licensing Board in this proceeding. See Memorandum and Order (Discovery and Hearing Schedules), February 9, 1993, (continued...)

DS03

the affidavits required by 10 C.F.R. § 2.740b(b) for the answers to the discovery requests are included in this response; due to logistical difficulties, originals will follow within the next several days. Copies of documents identified in Attachment 1 related to Contention I are being provided to the San Luis Obispo Mothers for Peace ("MFP") herewith.

I. GENERAL OBJECTION (Contention I: Maintenance)

Maintenance and surveillance quite obviously encompass a broad range of programs and activities at the Diablo Canyon Nuclear Power Plant, Units 1 and 2 ("the Diablo Canyon plant"). Equally obviously, these programs and activities encompass and impact numerous plant systems, structures, and components. Documentation of maintenance activities (e.g., procedures, vendor manuals, maintenance records) is correspondingly voluminous. In the context of the universe of maintenance and surveillance documentation that exists at the Diablo Canyon plant, MFP's First Set reflects an unfocused, shotgun approach to discovery on the maintenance contention that could unnecessarily burden PG&E and result only in overwhelming MFP in paper. Accordingly, as discussed below in the specific responses, PG&E is objecting to some of the requested maintenance discovery based on the sheer breadth of documentation

---

<sup>2/</sup>(...continued)

at 4, ¶ 2. In fact, in an effort to accommodate the intervenor by providing information in advance of a requested site visit (tentatively the week of March 15, 1993), these responses are being filed in advance of the due date of March 19, 1993.

involved. PG&E is specifying that these documents will not be provided simply as a convenience to MFP. Rather, upon a more narrow focusing or identification of documents requested, PG&E will make documents available for inspection and copying by MFP (at MFP's expense) at the Diablo Canyon site. This response is consistent with what is required of PG&E under 10 C.F.R. §§ 2.741(a)(1) and 2.741(d).

As originally proffered, MFP's Contention I related to PG&E's historic implementation of the maintenance program at the Diablo Canyon plant. MFP cited isolated examples of alleged errors in maintenance implementation ("lack of attention to detail, poor or incomplete work . . .") and isolated examples of an alleged "slow response to correct maintenance problems." See "San Luis Obispo Mothers for Peace Supplement to Petition to Intervene," October 26, 1992, at 5-13. On the basis of these alleged implementation difficulties, MFP contended that PG&E lacks a sufficiently effective and comprehensive maintenance program. See Prehearing Conference Order (Ruling Upon Intervention Petition and Authorizing Hearing), LBP-93-1, January 21, 1993, at 15-16 ("Prehearing Conference Order").

However, none of this focus remains in MFP's First Set. Instead, MFP seeks all manner of minutiae related to the plant maintenance/ surveillance program, including, for example, vendor manuals and "equipment literature" for twelve categories of

equipment. See MFP's First Set, Attachment E, Request 16, at E-4. MFP draws no distinction between maintenance program information and maintenance program implementation data. (Only the latter appeared to be the basis for the contention admitted by the Licensing Board.) MFP also seeks information addressing generic equipment aging issues of a type originally raised by MFP in proposed Contention IV, deemed inadmissible by the Licensing Board. Prehearing Conference Order, at 32-34. PG&E objects, as specified below, to requests that appear to be unnecessarily broad and insufficiently focused on issues subject to litigation in this proceeding. PG&E remains open to more precise requests to review documents at the Diablo Canyon plant.

MFP, in its February 1, 1993, request for discovery by entry upon the Diablo Canyon site,<sup>3/</sup> at 4-5, offered to focus its Contention I discovery. This is an offer that PG&E, in its response of February 12, 1993,<sup>4/</sup> at 2-3, welcomed and accepted, at least to the extent the discovery was limited to the scope of the admitted issue and conformed to NRC's Rules of Practice. MFP's First Set of interrogatories and document requests, however, is

---

<sup>3/</sup> "Intervenor San Luis Obispo Mothers for Peace Request to Pacific Gas and Electric Company for Entry Upon the Diablo Canyon Nuclear Power Plant, Units 1 and 2, Pursuant to 10 CFR 2.741(a)(2) . . ." dated February 1, 1993 ("MFP Discovery Request").

<sup>4/</sup> "Pacific Gas and Electric Company's Preliminary Response to Discovery Request Filed Pursuant to 10 CFR 2.741(a)(2) and Motion for Protective Order," dated February 12, 1993 ("PG&E Preliminary Response").

completely inconsistent with the earlier approach. Nonetheless, PG&E remains willing to cooperate with MFP in an approach along the lines originally proposed by MFP. This can be accomplished at the time of the previously requested MFP site visit.

## II. ANSWERS TO INTERROGATORIES

### Interrogatory 1:

Please identify the programs and procedures used to verify that the actual environment in the as-installed position, for both operating and accident conditions over the plant design lifetime, for each safety-related structure, system and component is bounded by the conditions in its environmental and seismic tests for life and aging.

### Answer to Interrogatory 1:

Equipment at the Diablo Canyon plant meets the requirements of 10 CFR 50.49 and 10 CFR 50 Appendix A, "General Design Criteria for Nuclear Power Plants," "Criterion 4" (GDC 4).

Safety-related<sup>2/</sup> items required to be environmentally qualified are stipulated in 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants". Verification that installed safety-related electric equipment is qualified for use in normal and accidental environmental conditions is controlled under the requirements of 10 CFR 50.49. Equipment in this program is qualified to operate

---

<sup>2/</sup> For the purposes of answering these Interrogatories, the terminology safety-related and important-to-safety are considered synonymous at the Diablo Canyon plant. This position is established in Inter-Departmental Administrative Procedure AD1.ID1.

during its normal qualified life and for design basis accidental conditions. The qualified life of such components is generally greater than 40 years. If the qualified life for equipment in this program is less than 40 years, it is replaced at the end of its qualified life to ensure that it will perform its intended function during normal and design basis accident conditions. The qualified life of these components is based on plant normal operational and accident design basis conditions. The procedures utilized to meet the requirements of 10 CFR 50.49 are NECS E3.13, AP C-451, AP D-756, DCM T-20, DCM T-12 and DCM T-15.

GDC 4 requires that structures, systems and components important to safety be designed to function when subjected to expected and postulated: 1) environmental effects associated with normal, maintenance, testing and accidents; and 2) dynamic effects of missiles, pipe whip and jets.

For safety-related equipment not within the scope of 10 CFR 50.49, controls are in place at the Diablo Canyon plant to address equipment design life. Program Directive (PD) TSI, "Plant Aging Management" outlines the policy for programmatic activities directed to control age-related effects for systems, structures and components ("SSCs") to meet the plant design and licensing basis over the life of the plant. The Plant Aging Management Program is established to meet several objectives. These objectives are: 1) to provide technical assurance that SSCs will continue to meet

the plant design and licensing basis over the life of the plant; 2) to further develop evaluation methods necessary to support aging management decisions; 3) to provide for plant SSC data collection and evaluation to support regulatory requirements concerning plant aging; and 4) to provide a process to integrate PG&E, industry and NRC aging experience and research with existing plans.

Several procedures assist in supporting PD TGI objectives. AP C-62, "Preventive Maintenance (PM) Living Program," states that the objective of the PM program is to ensure that safety-related and certain non-safety related structures, systems and components are maintained such that they will perform their intended function during normal and emergency conditions. NPAP C-40, "General Requirements for Plant Maintenance Programs" requires that a PM program for equipment be established and maintained. It requires that PM schedules be developed to specify schedules for equipment inspections and replacement of items that have a limited life or are susceptible to aging degradation, such as lubricants, filters, strainers, wear rings, bearings, seals, diaphragms, electrolytic capacitors, and power transistors in printed circuit boards.

Procedure, AP C-750, "Maintenance Department Preventative Maintenance Program," describes the PM program used by the DCPM Maintenance Department. This procedure defines PM as "a program of scheduled tasks necessary to ensure safe and reliable equipment operation." The objective of the PM program outlines in AP C-750

is to ensure that safety related and non-safety related structures, systems and components are maintained at the quality required to perform their intended functions.

PM frequency considerations identified in AP C-750 consist of manufacturers' recommendations, operating experience, equipment history, licensing requirements, personnel safety, cost/benefit analysis, consequences of failure, system interactions, equipment duty cycle, environment in which the equipment operates, and ALARA.

AP C-450, "Instrument and Controls Preventative Maintenance Program," describes the I&C PM program. The objective of this program is to ensure that plant equipment is maintained in a condition so that it will perform its intended function when required. This goal is accomplished through periodic inspections, calibrations, and functional testing.

Equipment procurement specifications outline technical requirements of equipment supplied to the Diablo Canyon plant in order that this equipment perform its design function. The equipment supplier typically recommends maintenance activities to provide assurance that the equipment performs as specified.

Reliability Engineering efforts are designed to assist in establishing equipment failure mechanisms. Trending and reporting of equipment failures is performed in accordance with Procedure AP

C-40S2, "Plant Equipment Failure Tracking and Trending". This procedure provides guidelines for the systematic tracking, trending and reporting of plant equipment failures. Equipment failure data is obtained from Action Requests, the Institute of Nuclear Power Operations ("INPO"), the Nuclear Plant Reliability Data System ("NPRDS"), and supplemental data on specific components and component failures supplied by the plant maintenance organizations.

Spare and Replacement Parts Evaluations ("RPEs") are performed under procedures NECS - E3.12, "Spare and Replacement Parts Evaluation." This procedure establishes engineering evaluations for spare and replacement parts, and new items utilized for modification as well as new designs at the Diablo Canyon plant. This procedure is mandatory for safety-related items and applies to parts that are not "identical" spare or replacement items. Under this procedure, technical evaluations establish that the replacement material, interface, inter-changeability, fit, form, and function attributes are satisfactory to establish application suitability.

Design changes are controlled by procedure NECS - E3.6DC, "Diablo Canyon Power Plant Design Changes." This procedure sets forth how engineering initiates, processes, approves and documents design changes for the Diablo Canyon plant. Under this procedure, design changes are reviewed for safety and technical considerations.

Industry awareness of any failures of critical safety-related equipment is also typically facilitated by NRC correspondence, usually in the form of Information Notices, Generic Letters, and Bulletins. Procedurally, disbursement of this information is controlled by Inter-Departmental Administrative Procedure (IDAP) XII.ID1, "Regulatory Correspondence Processing" and IDAP OP4.ID1, "Assessment of Operating Experience". This is extremely valuable since most of the equipment at the Diablo Canyon plant is similar to that at other nuclear plants; consequently, information on failure trends is gathered from a much larger data base.

Other procedures for inspection, maintenance, calibration, periodic equipment walkdowns, monitoring, surveillance, and testing are found in Volumes 1, 1B, 5A 5B, 5C, 6 and 16 of the Diablo Canyon Plant Procedures. These procedures will be available for review at the Diablo Canyon plant at the time of the MFP site visit.

Interrogatory 2:

Please identify the programs and procedures used to verify that the actual environment in the as-installed position (for both operating and accident conditions over the plant design lifetime) for each non-safety structure, system and component whose failure could prevent satisfactory accomplishment of safety functions, is bounded by the conditions in its environmental and seismic tests for life and aging.

Answer to Interrogatory 2:

See Answer to Interrogatory 1. The non-safety related SSCs that are qualified by environmental or seismic testing, if

applicable, due to their relationship with safety-related SSCs also consider service life and use through the whole process of design, testing, maintenance, and surveillance.

Interrogatory 3:

Please identify each safety-related and important-to-safety structure, system and component whose qualification and aging tests do not bound the possible environmental and seismic conditions over the plant design lifetime in its installed location. For each such identified item, please provide the details of actions that have already been taken and actions that are planned to be taken in response to this situation.

Answer to Interrogatory 3:

There are no safety-related structures, systems and components whose testing and/or qualification does not bound the design environmental conditions at DCPD. Items within the scope of 10 CFR 50.49 have established qualified lives (and replacements installed, when required) for the lifetime of the plant; items not in the scope of 10 CFR 50.49 are designed, purchased, and maintained to ensure operability over the lifetime of the plant.

Interrogatory 4:

Please identify each safety-related and each important-to-safety structure, system and component whose testing and operation during manufacturer's checkout, burn in, environmental qualification, and aging tests, combined with PG&E's system testing, startup testing and operation prior to full power license have rendered the remaining qualified life less than the plant design life as reflected in the current operating license. For each such identified item, please provide the details of actions that have already been taken and actions that are planned to be taken in response to this situation.

Answer to Interrogatory 4:

Qualified life, as the term is apparently used in this interrogatory, is applicable to safety-related items within the scope of 10 CFR 50.49. The qualified life is based on informal design operation and design basis accident parameters. System testing, startup testing and operation prior to full power license is not considered to affect a component's qualified life. Test specimens utilized in environmental qualification and aging testing are not used in the plant. Generally, plant normal environmental conditions used to determine qualified lives are more severe than actual normal operational conditions. Components that have qualified lives less than expected plant life are replaced so that they will operate properly and within the design basis over the life of the plant.

The seismic qualification of all safety related equipment and components have been performed using DCM T-10. The Appendix to DCM T-10, NEP001, provides a list of equipment and components that have been seismically qualified. All safety-related equipment and components have been seismically qualified for at least 40 years of plant life.

Interrogatory 5:

Please identify each safety-related and each important-to-safety structure, system and component whose testing and operation during manufacturer's checkout, burn in, environmental qualification, and aging tests, combined with PG&E's system testing, startup testing and operation prior to full power license have rendered the remaining qualified life less than the plant life as reflected in the current operating license plus the extension request in this proceeding. For each such identified item, please provide the details of actions that have already been taken and actions that are planned to be taken in response to this situation.

Answer to Interrogatory 5:

See Answer to Interrogatory 4.

Interrogatory 6:

Please describe in detail how PG&E demonstrates that the performance or condition of a safety-related or important-to-safety structure, system or component is being effectively controlled through the performance of appropriate preventive maintenance.

Answer to Interrogatory 6:

PG&E's surveillance inspection and testing programs provide assurance that systems, structures, and components needed for safe and reliable plant operation will perform within their required limits. Administrative Procedures AP C-3S1 describes the surveillance testing and inspection program used at the Diablo Canyon plant, including responsibilities, scheduling, performance, determination of equipment operability, review and reporting of results.

Diablo Canyon's Predictive Maintenance Program enhances plant safety and reliability through early detection and diagnosis of equipment degradation prior to equipment failure. The tools used in the predictive maintenance area include thermography, vibration analysis, oil analysis, acoustic monitoring and motor operated valve diagnostics. Administrative Procedure AP C-751 describes the details of the Predictive Maintenance Program.

In addition to the above, the Preventive Maintenance Living Program determines the applicable Preventive Maintenance ("PM") tasks, documents engineering evaluations, makes modifications to existing PMs, and tracks performance thereafter. Specific details of this program are contained in the AP C-62 series of administrative procedures, which will be available at the Diablo Canyon plant for review.

Interrogatory 7:

During the operating life of the Diablo Canyon plant, what structures, systems, and components that are important-to-safety (and/or safety-related) have been unavailable due to performance of monitoring or maintenance? For each such structure, system, or component, please state the length of time it was unavailable and the month and year during which the unavailability occurred.

Answer to Interrogatory 7:

PG&E objects to this interrogatory. The interrogatory is overly broad and requests information outside the scope of the contention, as admitted by the Licensing Board. Plant Technical Specifications allow equipment to be unavailable for limited

amounts of time. Therefore, it is routine for equipment to be "unavailable due to performance of monitoring or maintenance." Production of all such information not only would result in a voluminous quantity of documentation, but also would obscure the issue posed by Contention I; i.e., the implementation of an effective and comprehensive maintenance and surveillance program at the Diablo Canyon plant. This is an example of an unfocused, "fishing expedition" approach to discovery.

Interrogatory 8:

What actions, if any, has PG&E taken in response to the INPO standard (INPO 90-008) Maintenance Programs in the Nuclear Power Industry? What quantitative results does PG&E attribute to the actions taken in response to INPO 90-008? Please provide these results for each unit of Diablo Canyon compared to performance prior to applying the standard, and to the industry as a whole.

Answer to Interrogatory 8:

PG&E has taken no specific actions in direct response to INPO 90-008, but generally strives to meet the qualitative criteria stated in INPO 90-008.

Interrogatory 9:

Please provide the definition of "surveillance" as currently used in the Diablo Canyon quality assurance (QA) program.

Answer to Interrogatory 9:

The "Quality Assurance Manual for Diablo Canyon Power Plant - Glossary of Terms," dated November 1, 1985, defines "Surveillance Tests" as "[t]esting required by the facility Technical Specifications to assure failures, degradations, or substandard

performance of important plant equipment do not remain undetected and reliability of safety-related systems is maintained (Source ANSI N18.7)."

Interrogatory 10:

Please provide the definition of "surveillance" as used in the Diablo Canyon Units 1 and 2 Technical Specifications.

Answer to Interrogatory 10:

Technical Specifications ("TS") for the Diablo Canyon plant do not explicitly define "surveillance." However, TS Section 3/4 specifically identifies the required "surveillance testing."

Interrogatory 11:

Please provide the definition of "surveillance" as used in the Maintenance Program for Diablo Canyon Units 1 and 2.

Answer to Interrogatory 11:

Nuclear Plant Administrative Procedure (NPAP) C-3, "Conduct of Plant and Equipment Tests," defines "Surveillance Tests" as "Periodic tests and/or inspections to verify that structures, systems, and components continue to function in accordance with predetermined specifications, or are in a state of readiness to perform their safety functions."

Interrogatory 12:

Please identify all reports and audits by PG&E and/or outside consultants which have reviewed the maintenance and/or surveillance of safety-related structures, systems, and/or components. In identifying these documents and studies, please indicate the titles, dates, authors, number of volumes, and the number of pages in each volume.

Answer to Interrogatory 12:

PG&E objects to this request to the extent it requests information unrelated to the current performance and effectiveness of Diablo Canyon's maintenance and surveillance programs. Such a request, unfocused in time, is overbroad and burdensome. A substantial level of effort would be required to identify all of the requested information for the life of the plant (both units). The contention at issue should, of necessity, focus on current maintenance and surveillance efficacy. Historic performance in general, and specific long past "reports and audits" would have no materiality or probativity in the present proceeding.

Accordingly, PG&E has restricted its review of the Interrogatory to responsive information for calendar years 1990 to present, which roughly corresponds to the last two NRC Systematic Assessment of Licensee Performance ("SALP") periods. With this restriction, the following is or will be provided:

- A list of Maintenance and Surveillance Non-conformance Reports ("NCRs") (provided as Attachment 2);
- A list of Quality Assurance Department audits and other assessments and oversight reports (which will be provided at the Diablo Canyon plant at the time of the MFP site visit);
- A list of Quality Control inspection reports (i.e., the "QC Surveillance Log" (dated 2/26/93) provided in the Answer to Document Request 20);
- Onsite Safety Review Group monthly summaries, January, 1990- December, 1992 (which will be made available at the Diablo Canyon plant at the time of the MFP site visit);
- A copy of the Maintenance Process Improvement Project ("MPIP") Final Report, "Taking Maintenance Beyond

Excellence," December 1992 (provided in the Answer to Document Request 20);

- A copy of Nuclear Excellence Team, Diablo Canyon Maintenance Program Assessment, Final Report, dated August 27, 1991 (which is provided herewith);
- "1992 NPG Self Evaluation -- Maintenance Services" (a copy of which will be provided at the time of the MFP plant visit).

Interrogatory 13:

Please describe the process used at Diablo Canyon for tracking the surveillance activities which are required to be performed.

Answer to Interrogatory 13:

To respond to this Interrogatory, PG&E is providing a copy of Diablo Canyon plant Administrative Procedure AP C-3S4, "Use of PIMS Recurring Task Scheduler."

Interrogatory 14:

Please provide a description of PG&E's document control system used to track and control safety-related documentation for Diablo Canyon (including hard copy, computer systems, microfiche, and other media such as CD-ROM).

Answer to Interrogatory 14:

As responsive to this Interrogatory, PG&E is providing copies of four documents: Program Directive AD3, "Document Control"; Diablo Canyon Plant Procedure AP E-2, "PG&E Drawing, Aperture Card and Record Print Control"; Program Directive AD10, "Records"; and NPAP E-1, "Retention & Extended Storage of Operation Phase Activity Records."

Interrogatory 15:

Please identify all safety-related structures, systems, and components which have experienced degradation or life reduction due to plant testing in the 1970's and 1980's.

Answer to Interrogatory 15:

See Answer to Interrogatory 4. Any such equipment is covered by normal maintenance and surveillance programs as described in the Answer to Interrogatory 1.

Interrogatory 16:

Please describe the number and classification of personnel working on the maintenance and surveillance activities related to safety-related structures, systems and components at Diablo Canyon Units 1 and 2.

Answer to Interrogatory 16:

As responsive to this request, PG&E is providing a one page document titled "Manpower Levels Summary."

Interrogatory 17:

Please describe the number of maintenance items (including both routine and non-routine items) which were backlogged at the end of each calendar quarter in 1991 and 1992. (If data is not available on a quarterly basis but is available on some other interval, such as monthly, please provide the other data.)

Answer to Interrogatory 17:

As responsive to the Interrogatory, PG&E is providing a document titled "Maintenance Department Backlog" and Explanatory Notes.

Interrogatory 18:

Please describe the training procedures and retraining schedules for maintenance personnel at Diablo Canyon.

Answer to Interrogatory 18:

The training procedures governing maintenance personnel are: Mechanical Maintenance, AP B-751; Electrical Maintenance, AP B-752; Instrument and Controls, TQ1.DC30; and General Construction, GCP 2.2, GCP 2.3, and PI-64. These procedures will be available for review at the Diablo Canyon plant.

The maintenance training programs at the Diablo Canyon plant are accredited by the Institute of Nuclear Power Operations ("INPO"). They are based on a Systematic Approach to Training process ("SAT"), that involves analysis, design, implementation, evaluation and revision. The SAT process is a form of continuous improvement. Maintenance workers are qualified on specific tasks prior to being allowed to perform the task independently. Each procedure delineates the program specifics for the various disciplines. Each defines a basic level of training that is given to all journeymen as well as specific advance tasks given to selected individuals.

Continuing training consists of 40 to 80 hours of training per year on: industry and plant lessons learned, procedures/program changes, advanced task training, and refresher training on selected topics.

General construction ("GC") training is not task-based for crafts. It is procedure-based. GC crews are trained on how to

conduct maintenance. GC crews do not work independently; they work under constant supervision and direction of a field engineer.

Interrogatory 19:

Please identify all Licensee Event Reports (LERs) and Non-Conformance Reports (NCRs) issued by PG&E for Diablo Canyon Units 1 and/or 2 which relate to maintenance or surveillance activities.

Answer to Interrogatory 19:

A list of NCRs which relate to maintenance or surveillance activities is provided as part of Answer to Interrogatory 12, above (see Attachment 2).

A list of Licensee Event Reports ("LERs") issued from 1990 to present which relate to maintenance and/or surveillance activities is being provided in response to this interrogatory (see Attachment 3.)

For the same reasons stated in Answer to Interrogatory 12, above, PG&E objects to Interrogatory 19 to the extent it requests information unrelated to the current performance and effectiveness of PG&E's maintenance and surveillance programs. PG&E has issued 1990 as a cut-off date for identifying NCRs and LERs.

Interrogatory 20:

Please describe the procedures for verifying and documenting the experience level and qualifications of contract personnel brought into Diablo Canyon to work on maintenance and surveillance activities.

Answer to Interrogatory 20:

Incoming contract personnel for outages are trained, qualified and documented in conformity to the following procedures: Mechanical Maintenance, AP B-751; Electrical Maintenance, AP B-752; Instrument & Controls, TQ1.DC30; General Construction, GCP 2.2, GCP 2.3, PI-64; Quality Control, NPAP B-800, AP B-850. These procedures will be available for review at the Diablo Canyon plant.

Supporting craft personnel are hired from local union halls. The unions are responsible for tracking and determining the requirements for a journeyman classification within their respective unions. Once workers are brought on site, they are processed through the access organization and receive General Employee Training. At that point, they may be assigned to the plant line departments or to a General Construction crew. If they are assigned to the plant line departments, they are tested, trained and qualified on the specific tasks. If they are assigned to General Construction, they receive training on how maintenance is performed at the plant. They are then assigned to a crew which has a full time supervisor responsible for directing the work.

Instrument & Controls technicians for outages are hired either from local union halls or through a contracting agency. In both cases, applicants' resumes are reviewed and selected for hire. The technicians are processed through Access and General Employee Training and then tested and qualified to perform specific tasks.

Individuals brought in to work for contractors such as Westinghouse are considered task specialists. Task specialists are exempted from the above procedures. Their training and qualifications are the responsibility of the contractor bringing them on site. Often additional training is conducted on site specific mockups once they are on site. An example would be the Steam Generator crews brought in by Westinghouse. Contract inspectors brought in for outage work are assigned to either the plant or General Construction. In both cases, the individual resumes are reviewed and the contractors are trained and tested on the specific tasks they are to inspect.

Interrogatory 21:

What is the staffing level at each unit of the Diablo Canyon plant devoted to preventive maintenance activities and to corrective maintenance activities?

Answer to Interrogatory 21:

There are three Sections within the Maintenance organization at the Diablo Canyon plant: Mechanical, Electrical, and Instrument & Controls. Total staffing equals approximately 315 PG&E personnel during non-outage periods. Each Section is responsible for preventive and corrective maintenance activities which fall under their jurisdiction for both units. No Section or part thereof is devoted exclusively to corrective maintenance or preventive maintenance activities.

Interrogatory 22:

Please identify the INPO document(s) which provide recommendations concerning the magnitude of outstanding

preventive and corrective maintenance activities which nuclear power plants should strive not to exceed.

Answer to Interrogatory 22:

There are no current INPO documents that provide such recommendations.

Interrogatory 23:

Based on INPO-recommended levels of outstanding preventive and corrective maintenance activities (i.e., backlog), how have the levels of outstanding items over each of the last three years at each unit of the Diablo Canyon plant compared to the INPO average?

Answer to Interrogatory 23:

INPO performance indicators on preventive and corrective maintenance were discontinued in 1991 because of their limited usefulness for plant-to-plant comparisons. PG&E objects to the request to the extent it would request INPO performance indicators for years prior to 1991. INPO performance data, including plant comparisons, is generally and customarily withheld from public disclosure. See generally Critical Mass Energy Project v. Nuclear Regulatory Comm'n, 931 F.2d 939, 946 (D.C. Cir. 1991). This practice, stems from the fact that the confidentiality of INPO data is crucial to the accuracy and value of that data. Id. at 941. More importantly, in the context of the present case, the requested INPO industry performance indicators would be immaterial and unnecessary to a proper decision. As mentioned, these indicators were discontinued in 1991 expressly due to their lack of usefulness. Furthermore, industry performance prior to 1991 is very remote to the issues in this proceeding. Such data would have

little bearing on the current effectiveness of implementation by PG&E of the maintenance program.

Interrogatory 24:

Have you identified important-to-safety components for which the actual operating environmental conditions are not bounded by the environmental parameters used to precondition the equipment to its end-of-installed life conditions? If so, for each such case, identify the component and describe the action(s) that have been taken or are planned to be taken.

Answer to Interrogatory 24:

No. There are no important-to-safety components for which the actual operating environmental conditions are not bounded by the environmental parameters used to qualify the equipment. Safety-related components that could be exposed to harsh design basis accident environmental conditions that have qualified lives that are less than the design life of the plant are replaced before they reach end-of-life condition.

III. REQUESTS FOR PRODUCTION OF DOCUMENTS

B. Maintenance and Surveillance (Attachment E)

Document Request 1:

Please provide a copy of PG&E's comments to the NRC regarding the proposed maintenance rule (now in the regulations as 10CFR50.65 to be effective by July 10, 1996). This should include comments by PG&E and by any and all organizations representing PG&E's interests (e.g. NUMARC).

Answer to Document Request 1:

PG&E objects to this request. PG&E can discern no relationship between generic comments on the proposed maintenance rule and the specific maintenance program now being implemented at

the Diablo Canyon plant. Moreover, any issues of compliance with the maintenance rule are outside the scope of this proceeding. The rule, 10 C.F.R. § 50.65, does not become effective until July 1996. Nonetheless, all comments on the proposed rule would be available to MFP in the NRC's Public Document Room.

Document Request 2:

Please provide a copy of all correspondence between PG&E and the NRC related to the proposed maintenance rule (10CFR50.65) and its implementation at Diablo Canyon.

Answer to Document Request 2:

PG&E objects to this request essentially for the same reasons stated in response to Document Request 1 above. Compliance with the maintenance rule, or even present plans for compliance, are not matters in issue in this proceeding. At such time as the maintenance rule becomes effective, PG&E's compliance will be a matter for NRC inspection and/or enforcement oversight. Nonetheless, docketed correspondence between PG&E and the NRC on this matter would be available to MFP in the NRC's Public Document Room.

Document Request 3:

Provide a copy of the program and procedures used to verify that the actual environment in the as-installed position, for both operating and accident conditions over the plant design lifetime, for each safety-related structure, system and component is bounded by the conditions in its environmental and seismic tests for life and aging.

Answer to Document Request 3:

See Answer to Interrogatory 1. Copies of documents referenced therein will be made available at the Diablo Canyon plant.

Document Request 4:

Provide a copy of the program and procedures used to verify that the actual environment in the as-installed position, for both operating and accident conditions over the plant design lifetime, for each important-to-safety structure, system and component is bounded by the conditions in its environmental and seismic qualification tests for life and aging.

Answer to Document Request 4:

See Answer to Interrogatory 1. Documents referenced therein will be made available at the Diablo Canyon plant.

Document Request 5:

Provide a copy of the procedures covering maintenance and surveillance of safety-related and important-to-safety structures, systems, and components whose testing and operation during manufacturer's checkout, burn in, environmental qualification, and aging tests, combined with PG&E's system testing, startup testing and operation prior to full power license have rendered the remaining qualified life less than the plant design life and reflected in the current operating license.

Answer to Document Request 5:

See Answers to Interrogatories 1 and 4. Documents referenced therein will be made available at the Diablo Canyon plant.

Document Request 6:

Provide a copy of the procedures covering maintenance and surveillance of safety-related and important-to-safety structures, systems, and components whose testing and operation during manufacturer's checkout, burn in, environmental qualification, and aging tests, combined with PG&E's system testing, startup testing and operation prior to full power license have rendered the remaining qualified life less than the plant life as reflected in the current operating license plus the extension request in this proceeding.

Answer to Document Request 6:

See Answers to Interrogatories 1 and 4. Documents referenced therein will be made available at the Diablo Canyon plant.

Document Request 7:

Please provide the latest (most recent) report from the tracking system used to track the surveillance of safety-related structures, systems, and components at the Diablo Canyon plant.

Answer to Document Request 7:

The requested report, "STP Report (03/03/93)," is being provided.

Document Request 8:

Please provide a list of the Diablo Canyon plant structures, systems and components which are safety-related. If a key to acronyms and abbreviations is available for this listing, please also provide this key.

Answer to Document Request 8:

PG&E objects to this document request as vague. It is not clear what "list" is referred to. PG&E has previously provided MFP with the Diablo Canyon plant "Q-list". In addition, the Updated FSAR generally contains descriptions of safety-related and important-to-safety systems, structures, and components.

Document Request 9:

Please provide a list of the Diablo Canyon plant structures, systems and components which are important-to-safety but are not safety-related. If a key to acronyms and abbreviations is available for this listing, please also provide this key.

Answer to Document Request 9:

See Answer to Document Request 8.

Document Request 10:

Please provide a copy of the policy, procedures, and instructions for maintenance of structures, systems and components which are safety-related to Diablo Canyon Units 1 and 2.

Answer to Document Request 10:

PG&E is providing relevant Tables of Contents listing maintenance and surveillance procedures. MFP can review these lists to select procedures that it would like to review while at the Diablo Canyon plant. In addition, PG&E has already provided to the technical consultants for MFP (by letter from PG&E counsel dated March 3, 1993) copies of three "umbrella" maintenance procedures. These are identified in Attachment 1.

Document Request 11:

Please provide a copy of the policy, procedures, and instructions for maintenance of structures, systems and components which are important-to-safety but not safety-related at Diablo Canyon Units 1 and 2.

Answer to Document Request 11:

See Answer to Document Request 10.

Document Request 12:

Please provide a copy of the policy, procedures, and instructions for maintenance of structures, systems and components which are neither important-to-safety nor safety-related at the Diablo Canyon plant.

Answer to Document Request 12:

PG&E objects to this request. The request, by its terms, relates to equipment that is neither safety-related nor important-to-safety. Maintenance with respect to such equipment would appear

to have no bearing on either the effectiveness of the Diablo Canyon plant maintenance program or PG&E's implementation of that program, at least to the extent that the program or its implementation would have relevance to the license amendment at issue in this proceeding. Maintenance on equipment unrelated to safety is not a factor of significance in determining whether the amendment to allow the full, design basis, 40-year operating life should be granted.

Document Request 13:

Please identify the location, within the Diablo Canyon Updated FSAR and other plant descriptive documents provided to the NRC in the licensing process, of the description of the requirements and process for conducting surveillance maintenance and periodic replacement of structures, systems and components which are safety-related but have a qualified life shorter than the licensed plant life. Please provide the Updated FSAR references including sections and page numbers. If the requirements and descriptions are in documents other than the Updated FSAR or are in documents other than those provided to the NRC, please also provide a copy of these additional documents.

Answer to Document Request 13:

See Answers to Interrogatories 1 and 4. Documents referenced therein will be made available at the Diablo Canyon plant.

Document Request 14:

Please provide a list of the structures, systems, and components which are safety-related but which are known (for example, as a result of environmental and/or seismic qualification testing) to have a qualified design life that is less than the duration of the current plant license. For each such structure, system, and/or component, please provide copies of the surveillance and maintenance procedures and instructions applicable to that item.

Answer to Document Request 14:

PG&E objects to this request as overbroad. It can be accepted as a given that, over the operating life of a nuclear power plant, some equipment will degrade and/or wear out. That is, the qualified or operational life of the equipment is less than the full operating lifetime of the nuclear plant. Maintenance and surveillance programs are designed to address exactly this consideration. These programs include both predictive and reactive maintenance. Structures, systems, and components, that are safety-related or important-to-safety and subject to maintenance are generally described in the Updated FSAR. A "list" of such equipment would impart very little useful information in the context of this proceeding. The request for "copies of surveillance and maintenance procedures and instructions" applicable to all such equipment would encompass voluminous documentation and is simply overbroad.

Document Request 15:

Please provide a list of all safety-related structures, systems, and components that have a qualified design life measured from a date prior to receipt of the full-power Operating License. For each item identify the start date of the qualified design life period (month and year) and the qualified life (in year).

Answer to Document Request 15:

No list responsive to this document request exists. See instead Answer to Interrogatory 1. Documents referenced therein will be available for review at the Diablo Canyon plant.

Document Request 16:

For each of the equipment components or systems described below, please provide a copy of the maintenance information from the equipment literature and instruction manuals provided by the vendors (vendor manuals):

- (a) Auxiliary Saltwater System Pumps;
- (b) Auxiliary Saltwater System Motors;
- (c) Atmospheric Steam Dump Valves;
- (d) Suction Cooling Suction Valves;
- (e) Emergency Diesel Generators;
- (f) Supply Fans for 480 volt Switchgear Ventilation System;
- (g) Inverters for Vital Instrument Channels;
- (h) RWST Level Instruments;
- (i) Pressurizer Pressure Instrumentation;
- (j) 125 V DC Battery Chargers;
- (k) Emergency Lighting Batteries; and
- (l) Out-of-Core Start-up Neutron Detectors.

Answer to Document Request 16:

PG&E objects to this request only insofar as it seeks a copy of all the maintenance information (vendor information and manuals) for the equipment identified. PG&E is providing a list of documents available, within the scope of the request, for the equipment identified. See Attachment 4. PG&E does not agree to unnecessarily copy this information. PG&E will make this information available to MFP, or its technical consultant, at the Diablo Canyon plant. MFP may, at that time, review documents and make such copies as it wishes.

Document Request 17:

Please provide the process of tracking the maintenance activities which are normally required to be performed on systems, structures, and components which are important-to-safety (including safety-related structures, systems, and components), and provide a copy of the most recent report(s) generated by this tracking system.

Answer to Document Request 17:

In response to this request, PG&E is providing a printout of Electrical Work Orders and Recurring Task Activities.

Document Request 18:

Please describe the process of tracking maintenance activities which need to be performed but have not yet been completed (i.e., backlogged), and provide the most recent report(s) generated by this tracking system.

Answer to Document Request 18:

PG&E is providing a Mechanical, Electrical, and Instrument & Controls Backlog Statistics report.

Document Request 19:

Please provide a copy of the policies and procedures setting forth the requirements and qualifications of contract personnel to be used in maintenance and surveillance activities at Diablo Canyon Units 1 and 2.

Answer to Document Request 19:

Copies of the following procedures (as referenced in the Answer to Interrogatory 20) will be available during the upcoming plant visit: Mechanical Maintenance, AP B-751; Electrical Maintenance, AP B-752; Instrument & Controls, TQ1.DC30; General Construction, GCP 2.2, GCP 2.3, PI-64; Quality Control, NPAP B-800, AP B-850.

Document Request 20:

Please provide copies of all reports and audits by PG&E and/or outside consultants which have reviewed maintenance and/or surveillance activities at Diablo Canyon.

Answer to Document Request 20:

See Answer to Interrogatory 12. A copy of the MPIP Final Report, "Taking Maintenance Beyond Excellence," as referenced in the Answer to Interrogatory 12, is being provided. In addition, PG&E is providing the Diablo Canyon plant "QC Surveillance Log," dated February 26, 1993. Other documents and lists of documents identified in the Answer to Interrogatory 12 will be available for review at the Diablo Canyon plant.

Document Request 21:

Please provide the policy, procedures, and instructions for performing surveillance of the safety-related structures, systems, and components at Diablo Canyon Units 1 and 2.

Answer to Document Request 21:

PG&E is providing copies of the following procedures: Nuclear Power Generation Program Directive AD 13, "Test Control"; Administrative Procedure AP C-3S1 "Surveillance Testing and Inspection"; Administrative Procedure NPAP C-3, "Conduct of Plant and Equipment Tests."

Document Request 22:

Please provide copies of all Licensee Event Reports (LERs) and Non-Conformance Reports (NCRs) issued by PG&E for Diablo Canyon Units 1 and/or 2 which related to maintenance or surveillance activities.

Answer to Document Request 22:

See Answer to Interrogatory 19. Copies of the listed LFRs and NCRs will be made available at the Diablo Canyon plant.

Document Request 23:

Please provide copies of the procedures for verifying and documenting the experience level and qualifications of contract personnel brought into Diablo Canyon to work on maintenance and surveillance activities.

Answer to Document Request 23:

See Answer to Interrogatory 20. Copies of documents will be available for review at the Diablo Canyon plant.

Document Request 24:

Please provide copies of all reports and audits by PG&E and/or outside consultants which have reviewed the maintenance and/or surveillance of safety-related structures, systems, and components.

Answer to Document Request 24:

See Answers to Interrogatory 12 and Document Request 20.

Document Request 25:

Please provide copies of the INPO document(s) which provide recommendations concerning the magnitude of outstanding preventive and corrective maintenance activities which nuclear power plants should strive not to exceed.

Answer to Document Request 25:

See Answer to Interrogatory 22.

Document Request 26:

Please provide copies of the numeric, graphic, and written descriptions prepared by PG&E over the last three years of the Diablo Canyon plant's performance compared to the INPO recommendations for outstanding preventive and corrective maintenance activities.

Answer to Document Request 26:

See Answers to Interrogatories 12 and 23.

Document Request 27:

Please provide equipment qualification files for all electrically-operated valves inside containment (e.g., motor-operated valves, solenoid-operated valves, and pilot-operated valves) that are on systems important-to-safety. For each such valve, provide all records of ambient temperature, radiation, and humidity at the location of the valve during its operating life.

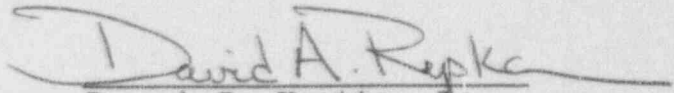
Answer to Document Request 27:

PG&E objects to this request. The request for equipment qualification ("EQ") files addresses an irrelevant matter and, in any event, is overbroad. The Diablo Canyon EQ program is not an issue in this proceeding. EQ is a design consideration; not a maintenance matter. Contention I does not create the opportunity to litigate design matters that were subject to review and litigation prior to initial licensing. Moreover, it is a given that the EQ files define a qualified life for electrical equipment and that equipment will be changed out at the end of the qualified life. This fact has no bearing on whether the requested license amendment should be granted.

In addition, to the extent PG&E's implementation of EQ maintenance is an issue, the request for the EQ files is overbroad.

The files represent a vast amount of design information with no bearing on plant maintenance.

Respectfully submitted,



Joseph B. Knotts, Jr.

David A. Repka

Kathryn M. Kalowsky

WINSTON & STRAWN  
1400 L Street, N.W.  
Washington, DC 20005-3502  
(202) 371-5726

Christopher J. Warner  
Richard F. Locke

PACIFIC GAS AND ELECTRIC COMPANY  
77 Beale Street  
San Francisco, CA 94106

Attorneys for Pacific Gas and  
Electric Company

Dated in Washington, DC  
this 12th day of March, 1993

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-OLA  
) 50-323-OLA  
) (Construction Period  
) Recovery)  
)  
)

AFFIDAVIT

I, Bryant W. Giffin, being duly sworn, hereby state as follows.

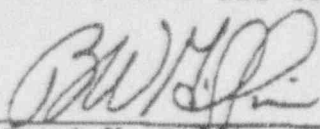
1. I am employed by Pacific Gas and Electric Company as Manager, Maintenance Services.
2. My business address and phone number are:

Diablo Canyon Power Plant  
104/5/505  
P. O. Box 56  
Avila Beach, CA 93424

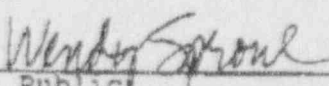
(805) 545-4158

3. I have provided the information which forms the basis for the answers to Interrogatories C-6, C-8, C-9, C-10, C-11, C-12, C-13, C-14, C-15, C-16, C-17, C-19, C-21 and Document Requests E-7, E-10, E-11, E-16, E-17, E-18, E-20, E-21, E-22, E-24, E-26 included in the attached "Pacific Gas and Electric Company's Response to First Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace."
4. The information contained in the referenced interrogatory answers and responses to requests for documents is true and correct to the best of my knowledge and belief.

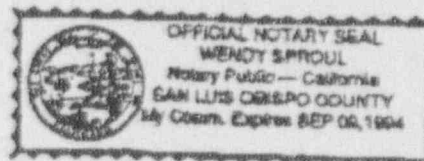
STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO SS.

  
Bryant W. Giffin

Sworn and subscribed to before  
me this 12<sup>th</sup> day of March, 1993

  
Notary Public

9-9-94  
My commission expires:



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-OLA  
50-323-OLA  
) (Construction Period  
) Recovery)  
)  
)

AFFIDAVIT

I, James A. Davis, being duly sworn, hereby state as follows.

1. I am employed by Pacific Gas and Electric Company as Senior Supervisor, Quality Assurance.

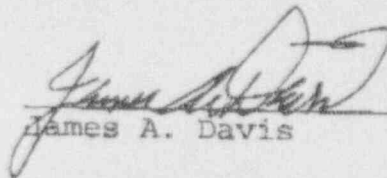
2. My business address and phone number are:

1 California Street, Room 1820  
San Francisco, CA 94111

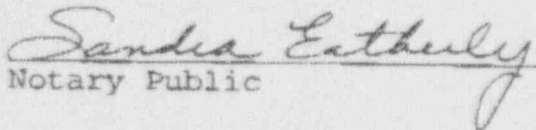
(415) 973-3249

3. I have provided the information which forms the basis for the answers to Interrogatories C-12, C-19 and Document Requests E-20, E-22, E-24 included in the attached "Pacific Gas and Electric Company's Response to First Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace."

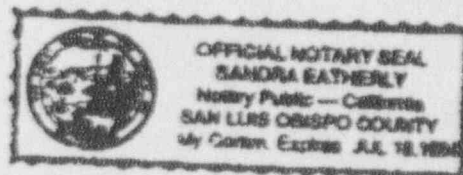
4. The information contained in the referenced interrogatory answers and responses to requests for documents is true and correct to the best of my knowledge and belief.

  
James A. Davis

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO  
Sworn and subscribed to before  
me this 10TH day of March, 1993

  
Notary Public

July 18, 1995  
My commission expires:



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

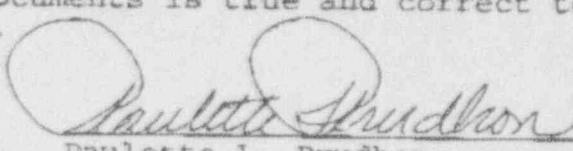
In the Matter of:

Pacific Gas and Electric Company	)	Docket Nos. 50-275-OLA
(Diablo Canyon Nuclear Power	)	50-323-OLA
Plant, Units 1 and 2)	)	(Construction Period
	)	Recovery)
	)	

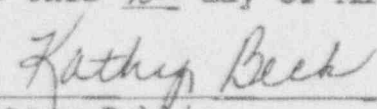
AFFIDAVIT

I, Paulette L. Prudhon, being duly sworn, hereby state as follows.

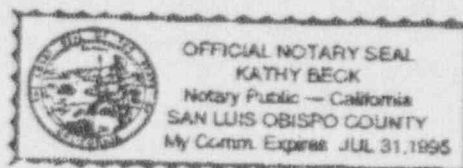
1. I am employed by Pacific Gas and Electric Company as Engineer, Quality Control.
2. My business address and phone number are:  
  
Diablo Canyon Power Plant  
104/3/8A  
P. O. Box 56  
Avila Beach, CA 93424  
  
(805) 545-4412
3. I have provided the information which forms the basis for the answers to Interrogatories C-12 and Document Requests E-20, E-24 included in the attached "Pacific Gas and Electric Company's Response to First Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace."
4. The information contained in the referenced interrogatory answers and responses to requests for documents is true and correct to the best of my knowledge and belief.

  
Paulette L. Prudhon

Sworn and subscribed to before  
me this 10<sup>th</sup> day of March, 1993

  
Notary Public

July 31, 1995  
My commission expires:



\* MAR-12-1993 15:15 FROM

TO NRA 11TH FLOOR P.01

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

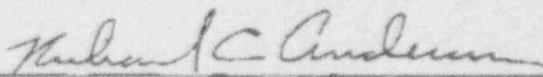
In the Matter of:	)	
	)	Docket Nos. 50-275-OLA
Pacific Gas and Electric Company	)	50-323-OLA
	)	(Construction Period
(Diablo Canyon Nuclear Power	)	Recovery)
Plant, Units 1 and 2)	)	
	)	

AFFIDAVIT

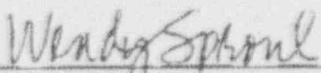
I, Richard C. Anderson, being duly sworn, hereby state as follows.

1. I am employed by Pacific Gas and Electric Company as Interim Manager, Nuclear Construction Services.
2. My business address and phone number are:  
  
335 Market Street, Room A1411  
San Francisco, CA 94105  
  
(415) 973-1252
3. I have provided the information which forms the basis for the answers to Interrogatories C-1, C-2, C-3, C-4, C-5, C-24 and Document Requests E-3, E-4, E-5, E-6, E-13, E-14, E-15 included in the attached "Pacific Gas and Electric Company's Response to First Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace."
4. The information contained in the referenced interrogatory answers and responses to requests for documents is true and correct to the best of my knowledge and belief.

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO ss.

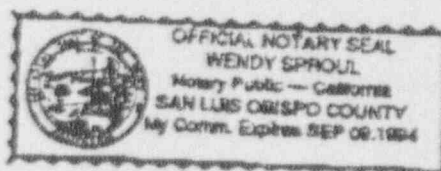
  
Richard C. Anderson

Sworn and subscribed to before  
me this 12th day of March, 1993

  
Notary Public

9-9-94

My commission expires:



MAR-12-1993 15:16 FROM

TO

NRA 11TH FLOOR P.02

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-OLA  
) 50-323-OLA  
) (Construction Period  
) Recovery)  
)  
)

AFFIDAVIT

I, John M. Gisclon, being duly sworn, hereby state as follows.

1. I am employed by Pacific Gas and Electric Company as Manager, Nuclear Operations Support.
2. My business address and phone number are:  
  
77 Beale Street, Room 1485  
San Francisco, CA 94105  
  
(415) 973-4758
3. I have provided the information which forms the basis for the answers to Interrogatories C-22, C-23 and Document Requests E-25 included in the attached "Pacific Gas and Electric Company's Response to First Set of Interrogatories and Request for Production of Documents filed by San Luis Obispo Mothers for Peace."
4. The information contained in the referenced interrogatory answers and responses to requests for documents is true and correct to the best of my knowledge and belief.

*John M. Gisclon*

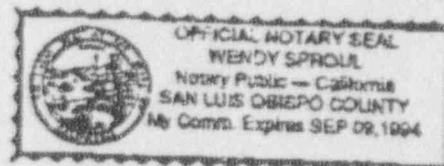
John M. Gisclon

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this 12th day of March, 1993

*Wendy Spraul*  
Notary Public

9-9-94  
My commission expires:



MAR-10-1993 17:08 FROM

TO NRR 11TH FLOOR P.02

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-OLA  
) 50-323-OLA  
) (Construction Period  
) Recovery)

AFFIDAVIT

I, Dale R. Clifton, being duly sworn, hereby state as follows.

1. I am employed by Pacific Gas and Electric Company as Supervisor, Training.

2. My business address and phone number are:

Diablo Canyon Power Plant  
119/2/247  
P. O. Box 56  
Avila Beach, CA 93424

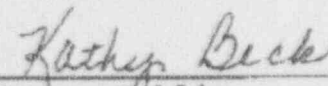
(805) 545-3380

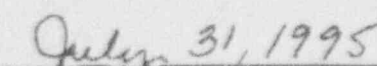
3. I have provided the information which forms the basis for the answers to Interrogatories C-18, C-20 and Document Requests E-19, E 23 included in the attached "Pacific Gas and Electric Company's Response to First Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace."

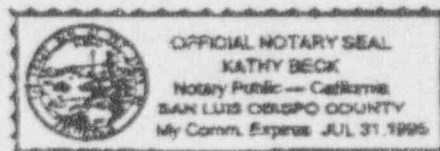
4. The information contained in the referenced interrogatory answers and responses to requests for documents is true and correct to the best of my knowledge and belief.

  
Dale R. Clifton

Sworn and subscribed to before  
me this 10<sup>th</sup> day of March, 1993

  
Notary Public

  
My commission expires:



## ATTACHMENT 1

## CUMULATIVE INDEX OF DOCUMENTS PROVIDED TO MFP

Starting Bates No.	Ending Bates No.	Document Date	Document Description
I. <u>DOCUMENTS PREVIOUSLY PROVIDED (BY LETTER DATED 3/3/93)</u>			
000001	000233	06/14/92	Report by PG&E titled "Classification of Structures, Systems, and Components for Diablo Canyon Units 1 and 2 (Q-List)," Rev. 14; USNRC Docket Nos. 50-275 and 50-323.
000234	000249	02/10/86	Diablo Canyon Plant Administrative Procedure, "General Requirements for Plant Maintenance Programs," NPAP C-40, Rev. 3.
000250	000271	09/01/92	Diablo Canyon Plant Administrative Procedure, "Instrument and Controls Preventive Maintenance Program," AP C-450, Rev. 9.
000272	000287	07/06/89	Diablo Canyon Plant Administrative Procedure, "Maintenance Department Preventative Maintenance Program," AP C-750, Rev. 10.
II. <u>THERMO-LAG (CONTENTION V) DOCUMENTS</u>			
<u>Interrogatory 4</u>			
000288	000296	12/05/88	Diablo Canyon Plant Administrative Procedure, "Plant Organization for Fire Loss Prevention," NPAP A-13, Rev. 7.
<u>Interrogatory 5</u>			
000297	000334	04/28/92	Diablo Canyon Plant Administrative Procedure "Fire Loss Prevention," AP C-13, Rev. 13.
<u>Interrogatory 9</u>			
000335	000340	09/11/90	Diablo Canyon Plant Administrative Procedure, "Qualification and Training Requirements of Plant Personnel Specifically Concerned with Fire Loss Prevention," NPAP B-13, Rev. 5.
<u>Document Request 4</u>			
000341	000353	02/24/93	Diablo Canyon Plant Instructor Lesson Guide, Fire Prevention, FEFA320.
<u>Document Request 5</u>			
000354	000364	1989	NFPA 51B, "Standard for Fire Prevention in Use of Cutting and Welding Processes", 1989 Edition.

<u>Starting Bates No.</u>	<u>Ending Bates No.</u>	<u>Document Date</u>	<u>Document Description</u>
<u>Document Request 8</u>			
000365	000373	12/11/91	Diablo Canyon Plant Administrative Procedure, "Fire System Impairment," NPAP C-113, Rev. 7.
<u>Document Request 9</u>			
000374	000390	10/8/92	Diablo Canyon Plant Surveillance Test Procedure, "Portable Detection System Installation, Testing and Operation Procedure," STP I-34J, Rev. 0.
<u>Document Request 19</u>			
000391	000399	-----	Diablo Canyon Plant General Arrangement Drawings 515562, -63, -68, -69, -70, -73, -77, -78, and -80.
<u>Document Request 26</u>			
000400	001286	-----	Fire Watch Logs (February 1, 1993, through February 28, 1993).

### III. MAINTENANCE (CONTENTION I) DOCUMENTS

<u>Interrogatory 12</u>			
002238	002262	08/28/91	Nuclear Excellence Team, Diablo Canyon Maintenance Program Assessment, Final Report, August 27, 1991, and cover memorandum from E.C. Connell to B.W. Giffin, dated August 28, 1991.
<u>Interrogatory 13</u>			
001287	001300	03/04/92	Diablo Canyon Plant Administrative Procedure, "Use of PIMS Recurring Task Scheduler," AP C-354, Rev. 1.
<u>Interrogatory 14</u>			
001301	001314	05/13/91	PG&E Nuclear Power Generation Business Unit Program Directive, "Document Control," AD3, Rev. 0.
001315	001323	08/09/91	Diablo Canyon Plant Administrative Procedure, "PG&E Drawing, Aperture Card and Record Print Control," AP E-2, Rev. 7.
001324	001330	01/12/93	PG&E Nuclear Power Generation Business Unit Program Directive, "Records," AD10, Rev. 0.

<u>Starting Bates No.</u>	<u>Ending Bates No.</u>	<u>Document Date</u>	<u>Document Description</u>
001331	001337	11/03/89	Diablo Canyon Plant Administrative Procedure, "Retention and Extended Storage of Operation Phase Activity Records," NPAP E-1, Rev. 6.
<u>Interrogatory 16</u>			
001338	001338	-----	Diablo Canyon Power Plant Manpower Levels Summary (Chart).
<u>Interrogatory 17</u>			
001339	001340	-----	Explanatory Notes and Maintenance Department Backlog (non-outage) Chart.
<u>Document Request 7</u>			
001341	001352	03/03/93	Diablo Canyon Power Plant STP Report (TCR 4080).
<u>Document Requests 10, 11</u>			
001353	001479	-----	Administrative Procedures Table of Contents, Vol. 1; Plant Electrical Maintenance Procedures Table of Contents, Vol. 5A (2/25/93); Mechanical Maintenance Procedures Table of Contents, Vol. 5B (2/25/93); Instrument and Controls Maintenance Procedures Table of Contents, Vol. 5C (2/25/93); Surveillance Test Procedures Table of Contents, Vol. 6 (3/1/93); Instrument and Controls Loop Test Procedure Index (2/27/93).
<u>Document Request 17</u>			
001480	001847	-----	Lists of Electrical RT Work Orders and Recurring Task Activities.
<u>Document Request 18</u>			
001848	001876	02/23/93	Explanation of Terms and Mechanical, Electrical and Instrument and Controls (and all other Department STPS) Backlog Statistics: By Department.
<u>Document Request 20</u>			
001877	001998	02/26/93	Diablo Canyon Plant Quality Control Surveillance/Inspection Log.
001999	002152	12/92	Maintenance Process Improvement Project (MPIP) Final Report, "Taking Maintenance Beyond Excellence."

<u>Starting</u> <u>Bates No.</u>	<u>Ending</u> <u>Bates No.</u>	<u>Document</u> <u>Date</u>	<u>Document Description</u>
<u>Document Request 21</u>			
002153	002169	10/03/92	PG&E Nuclear Power Generation Business Unit Program Directive, "Test Control," AD13, Rev. 0.
002170	002223	09/08/92	Diablo Canyon Plant Administrative Procedure, "Surveillance Testing and Inspection," AP C-3S1, Rev. 16.
002224	002237	03/24/92	Diablo Canyon Plant Administrative Procedure, "Conduct of Plant and Equipment Tests," NPAP C-3, Rev. 9.

Interrogatory 12

## MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC1-90-EM-N001	1-12-90	Dedication of relays
DC2-90-EM-N028	4-19-90	BTC 232/High charging current
DC2-90-EM-N029	4-19-90	Valve 8805B failed to meet stroke open time
DC1-90-EM-N042	6-11-90	SI-1-8805A Failed to cycle on actuation signal
DC2-90-EM-N044	6-11-90	Main generator load rejection
DCO-90-EM-N070	10-17-90	RHR motor 1-2 work not done in accordance with work order
DCO-90-EM-N081	12-4-90	Uninterruptible power supply for Units 1 and 2 AMSAC (ATWS mitigation system and circuitry) failed
DC1-90-MM-N002	1-15-90	Failure sleeves on condenser
DCO-90-MM-N013	3-16-90	Crosby relief valves
DC2-90-MM-N016	3-28-90	Snubbers found locked
DC2-90-MM-N023	4-17-90	Check valve MS-2-5166 was found stuck open
DC2-90-MM-N055	8-28-90	Snubber pin missing
DC2-90-MM-N071	10-25-90	FW-2-LCV-106 and 107 actuators installed
DC2-90-MM-N078	11-16-90	FCV-152 leakoff line supports not per design
DCO-90-MM-N089	12-21-90	Mechanical maintenance M&TE
DCO-91-EM-N009	1-21-91	FCV-495/496 corrosion prevented manual valve operation

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC1-91-EM-N027	3-6-91	RHR pump motor screws missing from bearing housing cap
DC1-91-EM-N041	2-5-92	ESF actuation - CVI
DC1-91-EM-N046	4-29-91	Unit 1 trip, 4-24-91 manual trip of Unit 1 due to power increase
DC2-91-EM-N077	9-12-91	MOV 9001B motor leads not joined with Raychem splices
DC2-91-EM-N084	10-3-91	Bus 2-G fire in 480v motor control center after start of diesel engine 2-1
DC2-91-EM-N086	10-3-91	Motor operated valve actuator failure
DC2-91-EM-N095	10-25-91	Circuit breaker failed to open on power transfer from auxillary to start-up transformer
DC1-91-MM-N015	2-13-91	ASW pipe support 286-72R unable to perform design function
DC1-91-MM-N018	2-19-91	Pipe support stud found not welded to containment liner
DC1-91-MM-N028	3-8-91	Loss of off-site power to U1 because of grounding incident between 500kv line and crane boom
DC0-91-MM-N034	3-15-91	Rigging from unapproved structures
DC0-91-MM-N037	3-22-91	Weld filler material not controlled in accordance with nuclear weld control manual

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC0-91-MM-N042	4-3-91	Foreign material exclusion area control less than adequate
DC0-91-MM-N049	6-6-91	DEG 1-3 test cock valve broke when tightened
DC0-90-MM-N057	8-31-90	Fire pump 0-2 maint deficiencies
DC0-91-MM-N061	7-12-91	Lubrication storage and handling discrepancies
DC1-91-MM-N066	8-6-91	Component cooling water heat exchanger 1-1 flooding
DC1-91-MM-N067	8-13-91	Auxillary salt water pump vault drain. Check valves
DC2-91-MM-N069	8-14-91	Leaking from charging subsystem of chemical and volume control system
DC2-91-MM-N072	8-27-91	MS-2-RV-225/60 relief valve declared inoperable due to faulty test equipment
DC2-90-TI-N025	4-18-90	Spurious CVI due to a voltage transient
DC2-90-TI-N031	4-24-90	Steam line isolation
DC2-90-T1-N068	10-15-90	Electrical room temperature monitor
DC1-90-T1-N090	12-24-90	Pressurizer sprug valve, 1-PCV-455B, failed open
DC2-91-T1-N003	1-15-91	Wrong channel adjusted
DC2-92-T1-N062	7-16-91	CVI during maintenance
DC1-91-T1-N068	8-13-91	CVI curing maintenance
DC2-91-T1-N088	10-7-91	Inadvertent SI due to personnel error

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC1-91-T1-N096	10-25-91	Containment wide range level failed low
DC1-92-T1-N039	9-8-92	FHB ventilation swap due to personnel error
DC2-90-0P-N020	4-16-90	Inadvertent ESF ventilation systems mode transfer
DC1-90-0P-N082	12-6-90	Unit 1 trip, 12-5-90, due to turbine runback failed to reduce generator level
DC1-90-0P-N083	12-10-90	ESF actuation due to leaking feedwater. Check valves
DC0-92-QA-N003	1-31-92	Maintenance program commitment had not been met
DC0-91-MM-N079	9-18-91	Diesel generator 2.2 loose camshaft dampener fastener
DC2-91-MM-N094	10-21-91	STP V-3P3 failure/FW-2-532
DC0-92-MM-N007	2-12-92	Containment fan coolers - counterweights on backdraft dampers missing or lacking locknuts
DC1-92-MM-N021	5-15-92	1-171SL snubber damage
DC0-92-MM-N022	5-26-92	HVAC maintenance practices - are they sufficient to assure equipment reliability and safety
DC1-92-MM-N033	7-8-92	Centrifugal charging pump D-1-motorhold down bolts found unmarked and machined down to their root diameter
DC2-92-EM-N026	6-3-92	Valve failed to fully open
DC1-92-T1-N020	4-29-92	CV1 RM-14B Spike
DC2-91-SS-N013	2-5-91	Fire protection (SSPS halon) - damper failed to close

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
		upon operation of the halon system
DC0-90-SE-N080	11-21-90	Fire in electrical panel
DC1-90-WP-N093	12-28-90	Inadvertent ground causes CV1 in Unit 1
DC1-91-WP-N012	2-1-91	Reactor trip - FW-1-530 & 540 closure resulting in a low steam generator level trip
DC1-91-WP-N021	2-20-91	Quality-related maintenance work performed w/o a work order as required by APC-4053
DC2-91-WP-N097	10-25-91	Missed PMT (post maintenance test not performed following maintenance on a safety injection valve
DC1-92-EM-N054	10-31-92	H0 POT on ASW PP motor 1-2 cable failed
DC0-90-MM-N057	8-31-90	Fire pump 0-2 maintenance deficiencies
DC0-90-TN-N064	10-15-90	Numerous pump STPs do not strictly meet requirements of ASME Code section XI
DC0-91-TN-N026	3-5-91	Various check valves not verified stroked closed as part of IST testing program
DC0-92-TN-N055	11-2-92	Vibration data for STP P-613 potentially taken at wrong location on pump
DC0-92-EN-N005	3-20-92	Reactor head vent solenoid valve terminal block material substitute may not meet EQ requirements

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC2-90-T1-N031	5-18-90	Steam flow transmitter reinstalled with sensing lines crossed
DC092-MF-N025	5-29-92	Design life/shelf life limitations for non-EQ equipment not adequately implemented
DC0-91-TR-N044	4-4-91	Maintenance Department's implementation of program requirements regarding personnel qualifications
DC0-92-TN-N004	1-28-92	Long term cooling water hoses hydo tested, failed and were not replaced, other LTCW hose were not tested
DC1-92-TC-N041	--	Time limit for surveillance required by Tech Specs including extension exceeded when a technician to perform gas decap tank surveillance
DC0-91-EN-N024	6-14-91	Safety related solenoid valve with unidentified electrical splice
DC1-91-EN-N019	5-6-91	Dielectric material in a connector different than specified in the environmental qualification report
DC2-91-TN-N023	2-21-91	Undersized welds installed in plant during work for the CVCS letdown line repair
DC1-92-TP-N052	10-12-92	Failed to recognize ASW pump was in alert range. Therefore, tests were not performed on an accelerated frequency

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC2-91-SS-N101	11-26-91	One damper failed during the cable spreading room cardox surveillance test
DC2-91-TN-N102	12-5-91	Work controls not effective in controlling accumulation of unsecured loose material in containment
DC0-90-SS-N063	9-21-90	Spurious discharge of cardox system during diesel generator cardox system testing
DC0-91-TN-N048	5-28-91	Certain check valves are not verified for full stroking open, as per IST Program
DC0-91-TN-N065	7-31-91	NRC violation for not having appropriate acceptance criteria for diesel generator starting air compressor
DC1-90-WP-N003	1-17-90	Boric acid heat tracing functional test not performed on schedule
DC1-91-EN-N016	6-11-91	Newly installed RHR valve failed to close during surveillance test
DC1-91-OP-N059	7-5-91	During STP M-16E operator error caused an inadvertent actuation of ESF
DC1-91-OP-N038	3-25-91	During performance of surveillance test an inadvertent ESF occurred
DC1-91-TN-N007	1-18-91	Fuel handling building ventilation system failed tech spec requirement
DC1-92-TN-N003	1-23-92	Boric acid transfer pump was not performed on an

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
		accelerated frequency as required
DC2-92-OP-N032	7-2-92	Missed step in STP I-1B performance
DC1-92-EN-N031	11-19-92	Recovery time determined during STP did not meet DCPD commitments for the diesel generator
DC1-91-TN-N002	1-3-91	Back leakage through main feedwater check valve may impact AFW system flow operability

P1/NCRs2.dis

Interrogatory 19

1990-1993 IERS RELATED TO MAINTENANCE/SURVEILLANCE

2-90-004-00 Containment Ventilation Isolation and FHB Ventilation System Shift to Iodine Removal Mode Due to Personnel Error During Troubleshooting

2-90-005-01 Closure of the Main Steamline Bypass Valves Due to Inadequate Backfilling of Transmitter Sensing Lines

2-90-006-01 Violation of Technical Specification Because of Inoperable Steam Flow Transmitters Due to Personnel Error

1-90-007-00 Missed Surveillance of Sealed Sources Due to Personnel Error

2-90-009-01 Inoperable Room Temperature Monitor Due to Personnel Error

1-90-014-00 Reactor Trip on Turbine Trip Due to Inadequate Evaluation of Runback Limit Setpoint

1-90-015-00 ESF Actuation, P-14 (High-High Steam Generator Water Level) Due to Feedwater Regulating and Bypass Valves Leakage

1-90-017-00 Reactor Trip Resulting from Failed Pressurizer Spray Valve Due to Incorrect Screw Installation

1-90-018-00 Fire Damper Cardox Actuation Fusible Link Assembly Incorrectly Installed for Indeterminate Reason

2-91-001-00 Containment Ventilation Isolation Resulting From a Voltage Transient Due to Personnel Error

1-91-002-00 Reactor Trip on Steam Generator Low Level with Steam Flow/Feedwater Mismatch due to Personnel Error

2-91-002-00 Potential Missetting of Main Steam Line Code Safety Valve due to Failure of Test Equipment

1-91-004-00 Loss of Offsite Power During Refueling Caused by Crane Due to Personnel Error

2-91-007-00 Inadvertent Safety Injection While in Mode 5 Due to Personnel Error

1-91-008-00 Manual Reactor Trip Caused by Rod Control Power Supply Fuse Failure Due to Personnel Error

1-91-009-00 Reactor Trip Due to Personnel Error on Safety Injection Due to Leaking Steam Dump Valve

2-91-009-01 10 CFP 100 Dose Limits Potentially Exceeded  
in Event of Design Basis Loss of Coolant Accident Recovery as a  
REsult of Valve Leakage

2-91-011-00 Failure to Test Valve Following Maintenance  
Due to Personnel Error

1-91-012-00 Emergency Diesel Fuel Oil Inventory  
Surveillance Missed Due to Personnel Error

2-91-012-00 Debris in Containment, Lack of Visual  
Inspections

1-91-013-00 Containment Ventilation Isolation During  
Maintenance due to Personnel Error

1-91-019-00 CFCUs Maintenance

1-92-005-01 Containment Ventilation Isolation Due to  
Spurious High Radiation Signal

1-92-006-00 Diesel Fuel Oil Transfer System Corrosion

1-92-010-00 MOV Fails Stroke Test

1-92-013-00 FHB I&C Test Error

1-92-017-00 Missed Chemistry Surveillance

1-92-024-00 Missed Accelerated Surveillance

1-93-002-00 Containment Isolation Valve Not Isolated in  
Accordance with Technical Specifications

Attachment 4

Document Request 16

(a) Auxiliary Saltwater System Pumps

(b) Auxiliary Saltwater System Motors:

Instruction Manual-Auxiliary Saltwater Pumps & Motors

(c) Atmospheric Steam Dump Valves:

Instruction Manual-Copes-Vulcan 8"-600# Diaphragm  
Operated Globe Valves

Instruction Manual-Copes-Vulcan D-100 Control Valve with  
D-100-160 Direct Acting Pneumatic Actuator

(d) Suction Cooling Suction Valves:

There is no such equipment at the Diablo Canyon Plant.

(e) Emergency Diesel Generators:

Instruction Manual-Westinghouse 3630/4330 BHP Diesel  
Engines for 2600 KW Generator Sets

(f) Supply Fans for 480 volt Switchgear Ventilation System:

Instruction Manual-Joy Series 1000/2000, Axivane Fans,  
Direct Connected Single and Two Stage Axial Flow Fans

(g) Inverters for Vital Instrument Channels:

Instruction Manual-Inverter for Instrument Power Supply  
7.5KVA, 60 HZ 1 Phase-w/460 V AC, 3 Phase, 60 HZ

(h) RWST Level Instruments:

Instruction Manual-Main Control Boards-Recorders

Instruction Manual-AP 4300-16 Actionpack Isolating  
Transmitter, Action Instruments Co.

Instruction Manual-Model 764 Differential Pressure  
Electronic Transmitter, ITT Barton

(i) Pressurizer Pressure Instrumentation:

Instruction Manual-Control and Protection Instrumentation  
System

(j) 125 V Battery Chargers:

Instruction Manual-Exide Filtered Constant Voltage Float  
Charger Model UPC, Three Phase

Instruction Manual-Exide Constant Voltage Filtered Float  
Charger Model UPC-130-3-400 Three Phase, 60 Hertz AC  
Supply

(k) Emergency Lighting Batteries:

Instruction Manual-Series SGL and S6N Batteries

(l) Out-of-Core Start-up Neutron Detectors:

Instruction Manual-Nuclear Instrumentation System

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

95 MAR 15 P3:00

In the Matter of:

Pacific Gas and Electric Company

(Diablo Canyon Power  
Plant, Units 1 and 2)

)  
)  
)  
)  
)  
)  
)

DOCKET NO. 50-275-OLA  
50-323-OLA  
(Construction Period  
Recapture)

CERTIFICATE OF SERVICE

I hereby certify that copies of "PACIFIC GAS & ELECTRIC COMPANY'S RESPONSE TO FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS FILED BY SAN LUIS OBISPO MOTHERS FOR PEACE (RE: CONTENTION I)" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk (\*), by Federal Express overnight delivery, this 12th day of March, 1993. Copies of documents being provided, as referenced in the discovery response, are being provided only to parties indicated by the (†) symbol.

Charles Bechhoefer, Chairman  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Frederick J. Shon  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Jerry R. Kline  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Office of Commission Appellate  
Adjudication  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
Attn: Docketing and Service  
Section  
(original + two copies)

Ann P. Hodgdon, Esq.(†)  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Adjudicatory File  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Peter Arth, Jr.  
Edward W. O'Neill  
Peter G. Fairchild  
California Public Utilities  
Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Nancy Culver, President  
Board of Directors  
San Luis Obispo Mothers for Peace  
P.O. Box 164  
Pismo Beach, CA 93448

Robert R. Wellington, Esq.  
Diablo Canyon Independent Safety  
Committee  
857 Cass Street, Suite D  
Monterey, CA 93940

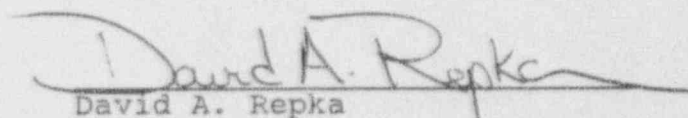
Robert Kinoshian  
California Public Utilities  
Commission  
505 Van Ness, Rm. 4102  
San Francisco, CA 94102

Mr. Gregory Minor\*(†)  
MHB Technical Associates  
1723 Hamilton Ave., Suite K  
San Jose, CA 95125

Truman Burns  
California Public Utilities  
Commission  
505 Van Ness, Rm. 4103  
San Francisco, CA 94102

Christopher J. Warner, Esq.  
Richard F. Locke, Esq.  
Pacific Gas & Electric Company  
77 Beale Street  
San Francisco, CA 94106

Jill ZamEk\*  
1123 Flora Road  
Arroyo Grande, CA 93420



David A. Repka

Counsel for Pacific Gas &  
Electric Company