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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before Administrative Judges:

Charles Bechoefer, Chairman
Dr. Jerry R. Kline
Frederick J. Shon

In the Matter of

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

Facility Operating Licenses
No. DPR-80 and DPR-82

Docket Nos. 50-275-OLA-2
50-323-OLA-2

ASLBP No. 92-669-03-OLA-2

(Construction Period
Recovery)

March 8, 1993

Intervenor San Luis Obispo Mothers for Peace

First Set of Written Interrogatories

and Requests for the Production of

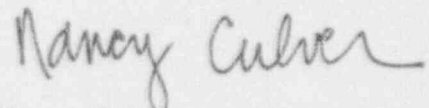
Documents to the NRC Staff

Pursuant to the Atomic Safety and Licensing Board ("the Board") Order of January 21, 1993, in this docket, and pursuant to 10 CFR 2.740b, Intervenor San Luis Obispo Mothers for Peace ("MFP") hereby propounds written interrogatories and requests for the production of documents, contained in Attachment A hereto, to be answered by the NRC staff under oath or affirmation according to the schedule established by the Board, following a determination by the Board pursuant to 10 CFR 2.720(h).

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Our consultants have searched NRC's computerized public documents system ("BRS") for NRC guidance documents on fire watches. No "NUREG" reports, no "NUREG/CR" reports, no Research Information Letters (RILs), no Information Notices, no Generic Letters, no Bulletins, and no Regulatory Guides were identified under the BRS Keyword "FIREWATCH". Further, in the NRC staff's most recent discussion of fire watches (contained in NRR Director Thomas Murley's denial of a 10 CFR 2.206 petition by NIRS) no reference is made to any study of any kind as establishing standards for or the adequacy of fire watches (either hourly or continuous) as a compensatory measure for degraded or inoperable fire barriers. Regarding the additional questions related to the NRC staff's positions and witnesses, and whether the staff has ever inspected PG&E's fire watch program, the NRC staff is in a unique position to be able to answer those questions. Accordingly, the Board should grant our request that the NRC staff be directed to respond to the interrogatories contained in Attachment A hereto.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Nancy Culver".

Nancy Culver
San Luis Obispo Mothers
for Peace

ATTACHMENT A
Interrogatories and Requests
for the Production of Documents

1. Please identify (by report author names and affiliations, report title, report number, and date of publication) any report or other document known to the NRC staff to evaluate in any way the adequacy of fire watches as a compensatory measure for degraded or inoperable fire barriers.
2. Please identify any standard (such as an ANSI standard or an NFPA standard) or other guidance upon which the NRC staff relies to evaluate fire watch programs established by utilities in the United States as compensatory measures for degraded or inoperable fire barriers.
3. Please identify (by report author names and affiliations, report title, report number, and date of publication) any report or other document known to the NRC staff to have examined the human factors reliability aspect of the performance of fire watches.
4. Please describe the NRC staff's understanding of the reliability of fire watch personnel in performing fire watches as compensatory actions for degraded or inoperable fire barriers, addressing, as appropriate, the historical frequency with which fire watches are missed, the historical frequency with which fire watches are late (and by what margin), the historical frequency with which fire watches are deliberately not performed and records related thereto are falsified, and the frequency with which a fire watch misses fire or conditions conducive to the occurrence of a fire (such as the presence of combustibles).

5. Please indicate whether the NRC staff has ever inspected or otherwise evaluated the fire watch program implemented by Pacific Gas and Electric Company at Diablo Canyon Units 1 and 2, and, if so, please identify the inspection reports or other documents containing the NRC staff's evaluation.
6. Please identify (by name, title, and organizational affiliation) the NRC staff's witnesses in this proceeding.
7. Please provide a summary of the NRC staff's position on the contentions admitted by the Board in this proceeding.