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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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

March 24, 1993

Intervenor San Luis Obispo Mothers for Peace
Motion to Compel Pacific Gas and Electric Company
to Respond to the First Set of Interrogatories and Requests for
Production of Documents Filed by San Luis Obispo Mothers for Peace
(Re: Contention I)

On February 16, 1993, the San Luis Obispo Mothers for Peace ("SLOMFP") filed its First Set of Written Interrogatories and Requests for Production of Documents to Pacific Gas and Electric Company. Pacific Gas and Electric Company ("PG&E") responded to SLOMFP Interrogatories and Requests for Documents relating to Contention I in PG&E's Response to First Set of Interrogatories and Request for Production of Documents Filed by SLOMFP (Re: Contention I) (March 12, 1993).

SLOMFP finds that many of the documents referenced by PG&E are not completely responsive to the SLOMFP requests. Many of PG&E's answers to SLOMFP inquiries are inadequate and incomplete. The SLOMFP moves to compel PG&E to answer the following SLOMFP interrogatories and requests for production of documents which PG&E has objected to or insufficiently answered.

Interrogatory 1

Despite the length of PG&E's answer, the SLOMFP cannot tell from the information provided whether "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." SLOMFP requests that PG&E provide one copy of each document: NECS E.13, AP D-756, DCM I-20, DCM I-12, DCM I-15, [PD]ISI "Plant Aging Management," procedure C-40S2 "Plant Equipment Failure Tracking and Trending," and NECS-E3.6DC "Diablo Canyon Power Plant Design Changes." These documents were not provided at the site visit.

Interrogatory 3

PG&E does not answer this question. The interrogatory is intended to identify structures, systems and components that do not have 40 year qualified lives. SLOMFP seeks an answer to this question from PG&E.

Interrogatory 4

The question is not fully answered. PG&E does not explain how system testing, startup testing and operation prior to full power license is not considered to effect a component's qualified life. SLOMFP requires quantitative criteria.

In order to complete the response to the seismic portion of this interrogatory, PG&E must provide one copy of Appendix to DCM I-10, NEP001, which provides a list of equipment and components that have been seismically qualified.

Interrogatory 5

PG&E's refers SLOMFP to the answer to Interrogatory 4. But PG&E's answer to Interrogatory 4 is not responsive to Interrogatory 5; it does not explain or identify the requested information. PG&E should be ordered to answer the question and provide the details that have been requested.

Interrogatory 6

In order to provide the information requested as an answer to Interrogatory 6, PG&E must provide the SLOMFP with one copy of

Administrative Procedures AP C-3S1, which describes the surveillance testing and inspection program used at Diablo Canyon Nuclear Power Plant ("DCNPP").

Interrogatory 7

SLOMFP is willing to modify this interrogatory, but PG&E should at the very least be required to provide information on safety-related structures, systems and components that have been unavailable due to maintenance or surveillance which **exceeded** plant Technical Specifications. For each such structure, system, or component, SLOMFP seeks the length of time it was unavailable and the month and year during which the unavailability occurred.

Interrogatory 8

In order to be responsive to this request, PG&E should be required to provide the SLOMFP with one copy of INPO 90-008 which includes the criteria mentioned in its reply.

Interrogatory 12 and Document Requests 20 and 24

PG&E objects to these requests, claiming that the information is unrelated to the current performance of the maintenance and surveillance programs at DCNPP. SLOMFP disagrees and finds it necessary to evaluate events and procedures throughout the entire operating life of the plant (which is not that lengthy). SLOMFP feels that it is essential that these basic evaluative documents be provided; PG&E's past maintenance and surveillance record is certainly relevant to current operation.

PG&E has responded to the interrogatory and document requests with a restrictive list of documents. SLOMFP is worried that this list is not fully responsive even for the limited time that was provided. PG&E should

be ordered to provide all the requested documents for the entire operating life of the plant.

Document Request 2

PG&E refuses to provide correspondence between PG&E and the NRC related to the proposed maintenance rule [10 CFR 50.65]. PG&E refers SLOMFP to the Public Document Room. But the Public Document Room may not have all of this correspondence. Furthermore, at the very least, PG&E should be required to identify this correspondence.

Document Request 12

PG&E objects to this request, claiming that maintenance of non safety-related equipment has no bearing on the effectiveness of the maintenance program at DCNPP. SLOMFP, however, finds that the maintenance of equipment not safety-related can indicate the general health of the maintenance program. Additionally, non safety-related equipment that is not well maintained could effect the function of safety-related equipment. SLOMFP requests that PG&E answer this request. Providing a list and descriptive titles will be acceptable.

Document Request 13

In order to be responsive to this request, PG&E must provide FSAR references, including sections and page numbers. This document was not provided at the site.

Document Request 14

In their refusal to respond to this document request, PG&E attempts to prevent evaluation of their maintenance program. This question is relevant. SLOMFP is entitled to evaluate maintenance procedures for equipment with a qualified life that is less than the duration of the

Certificate of Service

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I hereby certify that copies of the foregoing Intervenor San Luis Obispo Mothers for Peace Motion to Compel Pacific Gas and Electric Company to Respond to the First Set of Interrogatories and Requests for Production of Documents Filed by San Luis Obispo Mothers for Peace (Re: Contention I) have been served upon the following persons by U.S. mail, first class.

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

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

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

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

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

Edward O'Neill
Peter Arth, Jr.
Truman Burns
Robert Kinosian
Peter G. Fairchild, Esq.
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, CA 94102

Joseph B. Knotts, Jr., Esq.
Winston & Strawn
1400 L Street, N.W.
Washington, DC 20005

Adjudicatory File
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Secretary of the Commission
Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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

Christopher Warner, Esq.
Richard Locke, Esq.
Pacific Gas and Electric Co.
77 Beale Street
San Francisco, CA 94106

Dated March 24, 1993, San Luis Obispo County, CA
Jill ZamEk

Jill ZamEk

current plant license. PG&E should be required to provide this information.

Interrogatory 19 and Document Request 22

SLOMFP requested all LERs and NCRs issued by PG&E relating to maintenance and surveillance activities at DCNPP. PG&E limits this request and responds with a list of the LERs and NCRs **since 1990**. This list, however, is not even complete; many documents that are cited in the NCRs that PG&E has provided have not been listed or made available to SLOMFP. PG&E should be required to provide all LERs and NCRs for the entire period of plant operation.

Document Request 27

PG&E's objection is noted, but PG&E is wrong. EQ is certainly a design consideration, but depending on the **actual** environment that this equipment operates in, it may become an operating consideration as well. SLOMFP seeks to learn what environment PG&E is assuming and whether or not this environment is actually being maintained. PG&E should be compelled to provide this information. At the very least, PG&E should be required to answer the last sentence: "For each such valve, provide all records of ambient temperature, radiation, and humidity at the location of the valve during its operating life."

Respectfully submitted,

Nancy Culver

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