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RELATED CORRESPONDENCE

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

PACIFIC GAS AND ELECTRIC COMPANY'S
RESPONSE TO SECOND SET OF WRITTEN INTERROGATORIES
AND REQUESTS FOR THE PRODUCTION OF DOCUMENTS FILED
BY SAN LUIS OBISPO MOTHERS FOR PEACE

Pacific Gas and Electric Company ("PG&E") herein responds to "Intervenor San Luis Obispo Mothers for Peace Second Set of Written Interrogatories and Requests for Production of Documents to Pacific Gas and Electric Company," dated March 8, 1993 ("MFP's Second Set"). This response includes answers and objections in accordance with 10 C.F.R. §§ 2.740(b) and 2.741(d) and addresses MFP's Second Set in full. Copies of documents identified in Attachment 1 are being provided to the representatives of the San Luis Obispo Mothers for Peace ("MFP") herewith.

I. GENERAL OBJECTION

Regretfully, in responding to MFP's Second Set, PG&E must reiterate the general objections it has previously expressed in its "Response to First Set of Interrogatories and Request for

Production of Documents Filed by San Luis Obispo Mothers for Peace (Re: Contention I)" (hereafter "PG&E Response to First Set of Interrogatories, etc. - Maintenance"), dated March 12, 1993, and in its "Response to San Luis Obispo Mothers For Peace Motion to Compel Re: Contention I," dated April 8, 1993. Simply restated, PG&E objects generally to MFP's Second Set to the extent it continues to represent a catch-all request for every document under the sun that might in some fashion relate to the maintenance and/or surveillance of any of the tens of thousands of systems, structures and components which make up the Diablo Canyon Nuclear Power Plant (DCPP).

In good faith, PG&E has previously identified and produced reams of documents which relate to particular maintenance practices at DCPP, e.g. LERs, non-conformance reports and Quality Assurance audits relating to maintenance and surveillance activities since 1990; a list of all maintenance and surveillance procedures used at the plant; copies of maintenance recommendations from vendor manuals for a dozen systems or components; and a printout of PG&E's recurring task activities and electrical work orders. In addition, on several occasions since the beginning of discovery and in conference calls before the Board itself, PG&E has offered to MFP to produce maintenance histories of a sampling of components in connection with MFP's request for a site visit (MFP has consistently ignored this offer as well as the opportunity for

follow-up discovery connected to the site visit, which follow-up discovery MFP itself had expressly requested from the Board).

Therefore, in responding to MFP's Second Set, PG&E has applied the same good faith approach it has applied to earlier MFP requests. If the request is directed at a specific aspect of the maintenance or surveillance of a specific system, structure or component, PG&E has provided the information (e.g. check valves, Lixitorque motor operators). If the request is no more than a broad, plant-wide "fishing expedition," (e.g. "any" type of degradation relating to "any" system, structure or component), PG&E has objected. If the request simply repeats previous MFP requests to which PG&E has previously responded (e.g. LERs relating to maintenance; a hard copy of the FSAR Update), PG&E has referred MFP to its previous responses.

PG&E believes that MFP's discovery requests have shown a pattern of delay and misdirection, consisting of repeated requests to expand the scope of the proceeding, accompanied by repeated failures to take advantage of discovery within the scope of the proceeding. MFP has litigated and opposed the licensing and operation of Diablo Canyon for 20 years; their pattern of discovery in this proceeding is not contributing to a hearing on the merits, but, rather, to delay and frustration of the hearing process itself, consistent with their historic goal of shutting down the plant. PG&E respectfully requests that the Licensing Board take

this pattern and this history into account in reviewing MFP's various pleadings in connection with discovery.

II. ANSWERS TO REQUESTS

Request 1:

Please identify all safety related and important to safety systems, structures, or components at DCNPP that have experienced any type of degradation. For each of these systems, structures, or components, please provide the following information:

- a. How was the degradation detected?
- b. How was it determined whether repair or replacement was necessary?
- c. Provide the dates when [i] the degradation was discovered, [ii] an evaluation was made of the nature and extent of the degradation, and [iii] any repairs or replacements were done or planned.
- d. Please provide copies of any and all documents which discuss the nature, extent, means of detecting, and corrective measures considered or taken with respect to the degradation.

Answer to Request 1:

PG&E objects to this request as overbroad and burdensome for the same reasons stated in its General Objection and its Answer to Document Request 14 contained in "PG&E Response to First Set of Interrogatories, etc. - Maintenance"), dated March 12, 1993. As PG&E has reiterated time and again to MFP since MFP's February 1, 1993 request for discovery by entry upon the Diablo Canyon site, PG&E has remained willing to permit MFP to review the maintenance and surveillance history of a selected group of safety-related components prior to the April 12 deadline set by the Licensing

Board for discovery. To date, MFP has refused to accept PG&E's offer. PG&E is unwilling, however, to permit MFP to engage in an unfocused, uncontrolled "fishing expedition" in violation of the Commission's policies which emphasize focused discovery. See also 54 Fed. Reg. 33,168, 33,171 (1989) (the Commission's revised rules of practice are intended to preclude admission of issues where the "intervenor has no facts to support its position and where the intervenor contemplates using discovery or cross-examination as a fishing expedition which might produce relevant facts"). Furthermore, PG&E is unwilling to do MFP's work. If MFP believes there is a pattern of improper monitoring and control of degradation in specific equipment items, it should review the maintenance records to ascertain such a pattern. To ask PG&E to identify "all equipment" that has experienced "any kind of degradation" is an improperly broad request and an improper shifting of burdens to PG&E.

Request 2:

For each of the components or systems described below, please provide copies of PG&E's instructions and procedures for maintenance and surveillance. In addition, please provide copies of any Nonconformance Reports, or Licensee Event Reports involving any of these systems or components. In addition, please provide copies of any documents describing quality assurance deficiencies in these systems or components.

- 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 V 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 Request 2:

The maintenance and surveillance procedures applicable to the referenced components or systems were listed in the Tables of Contents provided to MFP in Answer to Document Request 10, "PG&E Response to First Set of Interrogatories, etc. - Maintenance." 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 generally applicable to these components or systems. A list of relevant LERs, NCRs and quality assurance audits which relate to current maintenance and/or surveillance activities, including those relating to the referenced systems and components, has already been provided in Answer to Interrogatory 12 and Answer to Interrogatory 19, "PG&E Response to First Set of Interrogatories, etc. - Maintenance." Copies of specific LERs, NCRs and quality assurance audits from these lists, as requested by MFP, were produced as requested during MFP's March 16, 1993, site visit.

If MFP has not completed its discovery of these documents, it should return to the site prior to the April 12, 1993 discovery completion date. For the same reasons cited in the above Answers, PG&E objects to this Interrogatory 2 to the extent it requests information unrelated to the current performance and effectiveness of PG&E's maintenance and surveillance programs.

PG&E is providing a list of component-specific or system-specific maintenance and surveillance procedures to the extent applicable to the referenced system or component. Copies of these procedures will be available to MFP at the plant site for inspection and/or copying.

Request 3:

What monitoring and surveillance techniques are currently used to detect aging and degradation of check valves at the DCNPP?

Answer to Request 3:

The DCPV check valve program consists of a combination of the following methods to detect degradation in safety-related check valves:

A. Flow or Pressure Tests

1. Flow Tests - performed normally at a refueling outage frequency, to verify full stroke operation capability
2. Seat Tightness Tests - also performed at refueling outage frequencies to quantify leakage when required for a particular valve's safety function. There are two basic types of seat tightness tests:
 - a. Local Leak Rate Tests (LLRTs)

b. Pressure Drop Tests

B. Disassembly Inspections

1. STP V-18, "Check Valve Inspection" - periodic internal inspections to satisfy Technical Specification requirements for specific safety-related valves.
2. AP C-750, "Maintenance Department Preventive Maintenance Program" - time directed recurring inspections based on in-service wear history.
3. AP D-760, "Check Valve Predictive Maintenance and Inspection Program" - This program is based on EPRI Application Guidelines for Check Valves in Nuclear Power Plants, NP-5479 and INPO SOER 86-03. It involves selection of a visual inspection sample each refueling cycle based on severity of service; location (distance downstream of flow disturbing sources such as pumps, elbows or control valves); flow velocity; maintenance and inspection histories; industry experience from other plants; and impact on safety. Valves found degraded are evaluated for inclusion in the PM program (item B.2, above). There are two primary check valve inspection procedures that contain detailed inspection instructions and criteria for acceptance. These are Maintenance Procedures M-51.14 and M-51.15.

C. Non-Intrusive Methods

1. Acoustics - used on particular valves to monitor for signs of degradation or to identify which valves in a

group of similar valves have the most wear for disassembly inspection selection purposes. The inspections are performed according to the procedures identified in item B. and the results evaluated for potential need to disassemble other valves.

2. Radiography - used case-by-case to check for specific concerns that require evaluation when the system the component is contained in is in service.

Request 4:

What monitoring and surveillance techniques to detect aging and degradation of check valves are now being studied or developed for possible future application at DCNPP?

Answer to Request 4:

DCPP has been evaluating non-intrusive testing technologies for check valve diagnostics over the past three years. This evaluation has involved three independent companies utilizing one or more of the following technologies: acoustic, ultrasonic and magnetic. Data collected on selected valves have been compared with actual field measurements during valve disassembly, as discussed in item B in Answer to Request 3, above, to verify the evaluation predictions.

Request 5:

Please provide copies of all documents evaluating in any way the effectiveness of existing or proposed measures for the monitoring of check valves at DCNPP.

Answer to Request 5:

A 1988 INPO evaluation included findings on the adequacy of DCP's check valve program with respect to the recommendations of INPO SOER 86-03 (see Answer to Request 3, above). No other documents are responsive to this request. PG&E objects to this request to the extent it includes the 1988 INPO evaluation, for the same reasons stated in Answer to Request 12 and Answer to Request 13, below. In response to the INPO findings, PG&E completed a design review of safety-related and significant non-safety-related check valves, and included the valves in maintenance procedure M-51.14, "Check Valve Inspection Program." All listed valves are evaluated for inclusion in preventive maintenance efforts. Following each refueling outage, the inspection results are evaluated to determine whether it is prudent to establish a recurring inspection for certain valves. Check valves which fail the inspection criteria are evaluated for generic implications.

Request 6:

Please identify all locations in which check valves are used in safety-related and important-to-safety applications at DCNPP.

Answer to Request 6:

PG&E objects to this request as overbroad. There are over 800 check valves at DCP. If the purpose of this request is to perform a sampling of maintenance histories of check valves, PG&E is willing to provide such histories while at the same time avoiding

the burden of identifying the location of each and every check valve at the plant.

Request 7:

What monitoring and surveillance techniques are currently used to detect aging and degradation of Limitorque motor operators at the DCNPP?

Answer to Request 7:

DCPP performs routine preventive maintenance that includes general cleaning and inspections that thoroughly examine all components of the operator including grease levels and quality, motor meggering, switch and wire integrity verification and inspections for age related degradation. The inspection also checks for proper environmentally qualified equipment configurations.

All MOV operators are also routinely overhauled. The overhaul involves a complete disassembly of the operator, thorough inspection of all subcomponents and parts, reassembly using new parts where necessary, and thorough post maintenance functional testing utilizing state of the art diagnostic equipment. This testing obtains data for motor current, switch actuation logic verification, and output thrust. Any sign of degradation found during these overhauls is corrected and the actuator is returned to an as new condition.

Temperature monitoring of certain operators is performed to determine ambient values at specific locations. This helps identify plant locations that may need increased maintenance attention. Trending of diagnostic test data is performed in an

effort to determine adverse trends in critical operator parameters. This allows us to identify possible deficiencies before they can affect operation of the actuator. The Nuclear Power Plant Reliability Data System (NPRDS) also tracks and trends failures.

Routine and special periodic surveillance testing in accordance with plant technical specifications is performed to verify operator integrity and operability following maintenance and prior to startup after outages.

Request 8:

What monitoring and surveillance techniques to detect aging and degradation of Limitorque motor operators are now being studied or developed for possible future application at DCNPP?

Answer to Request 8:

Monitoring and surveillance methods of detecting aging and degradation are constantly developing. DCPD continuously monitors industry advancements in this area and stays informed such that we can utilize any method that proves to be of value. Methods under study include increased grease sample analysis and advanced data acquisition of local environmental conditions at actuators subject to temperatures other than room temperature.

Request 9:

Please provide copies of all documents evaluating in any way the effectiveness of existing or proposed measures for the monitoring and maintenance of Limitorque motor operators at DCNPP.

Answer to Request 9:

Various reports provide evaluations regarding the effectiveness of maintenance of Limitorque operators at DCPD. These can be found in various NRC inspection reports and SALP evaluations (e.g. the January, 1992 NRC SALP evaluation; 1992 NRC inspection report No. 91-39 relating to Generic Letter 89-10). The NRC documents are available in the San Luis Obispo Public Document Room.

Request 10:

Please identify all locations in which Limitorque motor operators are used in safety-related and important-to-safety applications at DCNPP.

Answer to Request 10:

PG&E is providing a list herewith "MOVs Important To Safety - DCPD."

Request 11:

If you have not done so already, please provide copies of all Licensee Event Reports identified by PG&E in response to Interrogatories 17, 18, 19 of Attachment B to Intervenor San Luis Obispo Mothers for Peace First Set of Written Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company (February 16, 1993).

Answer to Request 11:

See Answer to Interrogatory 19, "PG&E Response to First Set of Interrogatories, etc. - Maintenance." Copies of such LERs as requested by MFP were produced during MFP's March 16, 1993, site visit.

Request 12:

Please provide copies of any reports prepared by the Institute for Nuclear power Operations ["INPO"] regarding fire protection and/or maintenance and surveillance programs or activities.

Answer to Request 12:

PG&E objects to this request as overbroad and without likelihood of leading to relevant information, because no showing is made regarding the relevance of general INPO data or evaluations which are not specifically applicable to Diablo Canyon. INPO information is privileged and subject to non-disclosure, for the policy reasons stated in Critical Mass Energy Project v. Nuclear Regulatory Comm'n, 975 F.2d 871 (D.C. Cir. 1992), cert. den. 61 U.S. Law Week 3647 (March 22, 1993). Such information is privileged because of the strong public policy interest in favor of self-critical, internal review and evaluation by licensees of potential problems. See Granger v. National R.R. Passenger Corp., 116 F.R.D. 507 (E.D. Pa. 1987); Bredice v. Doctors Hospital, Inc., 50 F.R.D. 249 (1970), aff. 479 F.2d 920 (1973); Webb v. Westinghouse Elec. Corp., 81 F.R.D. 431 (E.D. Pa. 1978); In re Crazy Eddie Securities Litigation, 792 F.Supp. 197, 205-6 (E.D.N.Y. 1992); see also Wylie v. Mills, 478 A.2d 1273 (1984). In addition, even if the request were construed as having been narrowed to be DCCP-specific, PG&E objects to it for the same reasons. See PG&E's Answer to Request 13, below.

Request 13:

Please provide copies of any reports prepared by the Institute for Nuclear Power Operations ["INPO"] regarding fire protection and/or maintenance and surveillance programs or activities specifically at DCNPP.

Answer to Request 13:

PG&E objects to this request as overbroad and because the information sought is privileged and subject to non-disclosure for the same reasons stated in Answer to Request 12, above. INPO self-critical evaluations and data are generally and customarily withheld from disclosure. See generally Critical Mass Energy Project v. Nuclear Regulatory Comm'n, 975 F.2d 871 (D.C. Cir. 1992), cert. den. 61 U.S. Law Week 3647 (March 22, 1993). This practice stems from the fact that the confidentiality of INPO evaluations is crucial to the accuracy, value, and self-critical nature of those evaluations. To the extent this request seeks INPO information unrelated to the current effectiveness and performance of PG&E's maintenance and surveillance program or to PG&E's implementation of interim compensatory measures (e.g. fire watches) in Thermo-Lag areas, it is overbroad. INPO evaluations of fire protection activities other than the Thermo-Lag interim compensatory measures are not relevant to the scope of the contention as admitted by the Licensing Board. Nor are INPO evaluations of PG&E maintenance activities which pre-date 1990-present, a time period comparable to the period reviewed by the NRC's last two SALP evaluations.

Request 14:

Please provide a complete, up-to-date set of piping and instrumentation drawings [P&IDs"] for DCNPP.

Answer to Request 14:

PG&E objects to Request 14 as overbroad for the same reasons cited in General Objections stated in this response and in "PG&E Response to First Set of Interrogatories, etc. - Maintenance." PG&E remains willing to produce specific drawings, prior to April 12, 1993, to the extent the drawings are relevant to a sampling of components as suggested in MFP's February 1, 1993, request for discovery. In the alternative, prior to the same deadline, MFP remains welcome to inspect and copy specific relevant drawings at the DCPD site.

Request 15:

Please provide an up-to-date hard copy of sections of the Final Safety Analysis Report for DCNPP which include:

- a. system descriptions of systems containing safety-related or important to safety structures, systems, and components; and
- b. arrangement and layout drawings for each major elevation in the reactor containment building, auxiliary building, fuel handling building, turbine building, and the intake structure.

Answer to Request 15:

This document is available to MFP in the Public Document Room.

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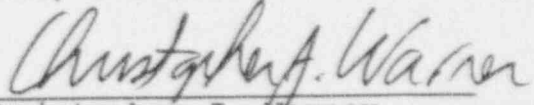
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See 10 C.F.R. § 2.740(b)(1); see also Discovery and Scheduling Order, at 3.

Respectfully submitted,

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Dated in San Francisco, CA
this 12th day of April, 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.

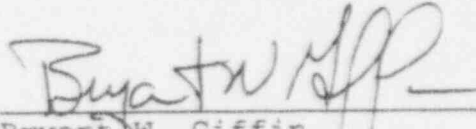
2. My business address and phone number are:

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

(805) 545-4168

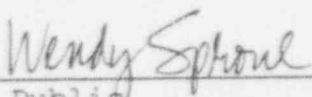
3. I have provided the information which forms the basis for the answers to Interrogatories 3, 4, 5, 6, 7, 8, 9, and 10 included in the attached "Pacific Gas and Electric Company's Response to Second Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace."

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.


Bryant W. Giffin

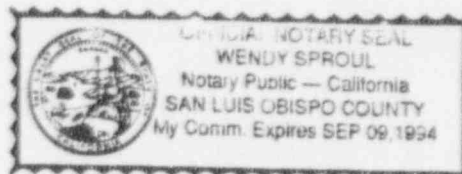
STATE OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO SS.

Sworn and subscribed to before
me this 9th day of April, 1993


Notary Public

9-9-94

My commission expires:



APR 16 P3:22

Docket Nos. 50-275-OLA
50-323-OLA
(Construction Period
Recapture)

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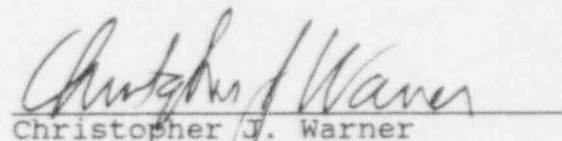
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