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## RELATED CORRESPONDENCE

April 12, 1993  
USNRC

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

Pacific Gas and Electric Company

(Diablo Canyon Nuclear Power  
Plant, Units 1 and 2))  
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)  
)  
)  
)  
)Docket Nos. 50-275-OLA - 2  
50-323-OLA  
(Construction Period  
Recovery)PACIFIC GAS AND ELECTRIC COMPANY'S  
RESPONSE TO THIRD 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 Third Set of Written Interrogatories and Requests for Production of Documents to Pacific Gas and Electric Company," dated March 8, 1993 ("MFP's Third 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 Third Set in full. PG&E continues to object generally to the approach taken in MFP's Third Set for the same reasons stated in PG&E's general objections to MFP's previous interrogatories and requests for production of documents. Many of the requests are broad and unfocused. As stated previously, PG&E will make specific documents requested by MFP available for inspection and copying by MFP at the plant site. In addition, as a convenience to MFP, copies of

documents identified in Attachment 1 are being provided to MFP herewith.

I. Contention I -- Maintenance and Surveillance

Interrogatory 1:

As used in the DCNPP maintenance procedures, please define the terms: (1) Important to Safety, (2) Important to Environmental Qualification, (3) Quality Related.

Answer to Interrogatory 1:

1. "Important to Safety" - For the purpose of the DCPD quality assurance program, "important to safety" and "safety-related" are considered synonymous. "Safety-related" activity means any activity that could affect the ability of a safety-related item to perform its intended function. The term "Safety-related items" means "structures, systems, or components designed to remain functional during and following design basis events to assure:

a. The integrity of the reactor coolant pressure boundary.

b. The capability to shut down the reactor and maintain it in a safe shutdown condition.

c. The capability to prevent or mitigate the consequence of accidents that could result in potential offsite exposures comparable to the guideline exposures of 10 CFR 100."

(Reference: Quality Assurance Manual for Nuclear Power Plants, DCPD; Procedure QAP-2.E, section 2, "Definitions.")

2. "Important to Environmental Qualification" does not have a specific definition within the QA program covering maintenance. However, PG&E complies with 10 CFR 50.49(b), which specifies the electrical equipment important to safety that is covered by environmental qualification requirements.

3. "Quality-related" refers to items and activities covered by the quality assurance program. This includes safety-related, important-to-safety, and graded items and activities. (Reference: Quality Assurance Manual for Nuclear Power Plants, DCPN; Procedure QAP-2.E, section 2, "Definitions.")

Interrogatory 2:

Please describe how the master list of items subject to Preventive Maintenance (as described in NPAP C-40, p. 2) is used by each of the separate PM programs at DCNPP. Who maintains control over the accuracy and completeness of the master list? Who decides when the frequency of a PM activity is to be altered? What is the Importance classification of the list? Please provide a copy of the latest version of the list.

Answer to Interrogatory 2:

The master list of equipment subject to Preventive Maintenance (PM) is maintained in the Plant Information Management System (PIMS) computer database. Since this list is subject to change, a hard copy of the list is not maintained. The list identifies the PM task scope and frequency. All maintenance disciplines use the data base to identify when PM tasks are due. The data base is also used to automatically schedule the performance of PM tasks.

Completeness and accuracy of the list is maintained by allowing only the Preventive Maintenance Engineers (Predictive Maintenance) to authorize changes.

Changes in the frequency of a PM activity may be made only with the authorization of the Preventive Maintenance Engineer. (Priority 1 tasks also require the authorization of the Director of the respective Maintenance Discipline).

Although the components contained on the list have assigned safety importance classifications, the list itself is not assigned an importance classification. PG&E is providing a copy of the list herewith.

Interrogatory 3:

Please provide a copy of Procedure NPAP D-756 related to Maintenance of Environmental Qualification.

Answer to Interrogatory 3:

PG&E previously provided a copy of AP D-756 to MFP during the March 16, 1993, site visit.

Interrogatory 4:

Please provide a copy of Procedures NPAP C-3, and C-6 related to Post-Maintenance Testing.

Answer to Interrogatory 4:

PG&E previously provided a copy of NPAP C-3 to MFP in Answer to Document Request 21 of its "Response to First Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace (Re: Contention I)," dated March

12, 1993. PG&E is providing a copy of the successor to NPAP C-6, OP2.ID1, herewith.

Interrogatory 5:

Has there been an occurrence at DCNPP of inadequate control of jumpers and bypasses after maintenance or surveillance activities? What is the frequency of occurrence during each year of operation of DCNPP?

Answer to Interrogatory 5:

Yes. 1992:	1
1991:	2
1990:	1
1989:	4
1988:	2
1987:	2
1986:	3
1985:	2

Interrogatory 6:

Please describe the activities and documentation governing tailboard briefings (e.g. NPAP C-40 mentions them at p. 11). Where in the procedures are the functions of tailboard briefings defined? Please provide a copy of the applicable procedures.

Answer to Interrogatory 6:

Requirements for tailboard briefings (tailboards) are not formally defined in plant procedures. The requirements for conducting briefings are outlined in the PG&E Accident Prevention Rule Handbook under Section 1, Rule 41. Plant management's expectations for tailboards were conveyed to all plant employees by the Vice President, Diablo Canyon Operations and Plant Manager,

John D. Townsend, in a memorandum dated December 6, 1991, a copy of which is being provided. All first line supervisors have the opportunity to attend Maintenance Supervisor Training (MST) which includes a training module on conducting tailboards. A copy of the Lesson Plan - "Conducting Tailboards," DMEET03, for this class is being provided.

Interrogatory 7:

While the procedures allow for deviations from the written procedures in certain conditions (e.g. NPAP C-40, p. 11), how is permission to implement such leeway decided for any particular worker?

Answer to Interrogatory 7:

The referenced procedure text does not allow deviations from written procedures, but rather identifies a situation in which written procedures may be overly restrictive for the intended use. It further identifies a mechanism which may be used to address the need for a minor procedure change. Detailed instructions for implementing this provision are contained in Inter-Departmental Administrative Procedure (IDAP) AD1.ID2, "Revision Level 'A' Procedure Review, Approval, Revision Control and Training Notification," Appendices, 7.2 ("The Expedited Procedure Revision Process"), 7.3 ("The On-The-Spot Change Process"), and 7.4 ("Instructions for Completing the OTSC Form").

Plant requirements for procedural compliance are contained in IDAP AD2.ID1, "Procedure Use and Adherence." This procedure requires that any person performing a job for which a procedure exists be responsible to perform the task using the method

described therein. When procedural errors are found which affect the technical context of a procedure, or a procedure cannot be performed as written, the procedure must be revised prior to use or continuation.

Interrogatory 8:

Please provide one complete current copy of Action Requests/Quality Plant Problem Reports.

Answer to Interrogatory 8:

PG&E objects to this interrogatory as patently overbroad. There has been no showing regarding the relevance, or even potential relevance, of all Action Requests/ Quality Plant Problem Reports to maintenance or surveillance activities at DCP. Contention 1 in this proceeding relates only to DCP maintenance and surveillance processes. Under PG&E's problem resolution program, Action Requests and Quality Plant Problem Reports relate to all aspects of the Company's nuclear program, not solely to maintenance or surveillance activities.

Interrogatory 9:

Please define the criteria that are used in deciding when and how to implement and when and how to stop implementing the portion of NPAP C-40 pps. 14 and 15 which refer to situations such as "[i]f evidence indicates that a significant number of common components in safety-related systems have performed unsatisfactorily, corrective measures shall be planned . . ." and "[i]f deemed necessary, an augmented testing and inspection program should be implemented following large scale component replacement (or repair) until such time as a suitable level of performance has been demonstrated." Who is responsible for defining these criteria and who is responsible for implementing and documenting the decisions made using these criteria?

Answer to Interrogatory 9:

There is no definition for the criteria requested. When a safety-related component fails, the failure is documented in an Action Request (AR). These ARs are reviewed by Maintenance, Reliability Engineering, and Quality Control personnel. The Reliability Engineering personnel review the failure to determine if a higher than expected (above industry average) failure rate is occurring; if so, they recommend replacement. The QC personnel review the facts to determine if a quality problem is indicated or a root cause analysis is necessary. If it is determined to be a nonconforming condition, action is taken to initiate a nonconformance report. In the course of completing the nonconformance report, actions would be taken to investigate the condition to the extent necessary to determine the root cause for the component failure. In parallel, the need for immediate compensatory actions to insure continued safe operation of the plant would be determined and appropriate measures taken. Once the root cause for the failure is determined, corrective actions necessary to prevent recurrence of similar failures of the component would be implemented.

Interrogatory 10:

How is the split of trade responsibilities implemented when there are multiple disciplines requires [sic] in the maintenance or surveillance of a single component. Please illustrate your answer by considering a hypothetical unit involving electronic components, a computer programmable logic control element, electrical actuators, mechanical processes and piping. How is the activity coordinated between the mechanical, electrical and instrumentation & control maintenance programs?

Which discipline is given lead responsibility and how is this decided? Which discipline is accountable for maintenance of software or firmware functions? If the activity involves testing or changing some aspect of the software/firmware functions of a hypothetical controller or system, how are all aspects of the functionability of the unit verified at the end of the maintenance or surveillance activity?

Answer to Interrogatory 10:

The Maintenance Work Request ("Action Request" or "AR") is assigned to the lead discipline (see detail below). This group is then tasked with coordinating all other support functions. For the hypothetical example given, this would take the form of official requests for development of parallel work orders (electronically linked to the same AR) by the other two maintenance groups. Additionally, the complete maintenance action could very well involve certain second-tier support organizations such as security (e.g., security door or wall work), safety (e.g., confined space sampling), radiation area access, engineering support, etc. Notifications to these support groups are typically accomplished by the same mechanism as the inter-discipline call-out: via an AE ("Action Evaluation") electronically linked to the source AR.

Some categories of work which involve a high degree of cross discipline interaction (such as the hypothetical example) may be handled on a "combined crew" basis, wherein a single work order including all necessary actions will be written by the lead discipline planners with input from the planners in the other groups. This work order will be assigned to a multi-discipline crew specifically formulated for the task. Labor allocation (including

assignment of a foreman) will be handled by the General Foremen of the affected disciplines by mutual agreement.

For jobs which require a clearance (e.g., equipment isolation), the operations group will issue a master clearance which secures all affected portions of the equipment. Each related discipline will "report on" to the clearance at such time as their portion of work is scheduled to be accomplished.

Each of the three maintenance disciplines involved with the job will have a separate work order which details the specific maintenance or surveillance activities which are to be accomplished by that group. Cross-discipline coordination steps are included in the body of the work order by joint agreement of the involved planners. For example, when the mechanical maintenance crew is ready to have a controller disconnected from the body of the device, there will be a step in their work order to contact the I&C foreman to accomplish that task. The I&C foreman will send out a crew to perform the work, and they will have a work order which turns the responsibility back to the Mechanical foreman at the conclusion of the work. Both activities are shown on the schedules for the respective foremen to enable labor resources to be staged as necessary.

In some time-critical or large-scale maintenance tasks, the support foremen will directly assign their craft personnel to the lead foreman so that the job can continue without interruption.

When an AR is received by the Work Planning Center, it is initially assigned to the planning group whose associated

discipline is most directly related to the largest work scope. If, on further investigation, the planning group determines that the primary work focus would best be accomplished by an alternate discipline, the senior planners in each affected group re-assign lead responsibility for the task via joint agreement. However, this is an infrequent occurrence as the identity of the lead discipline is generally obvious from the onset of the planning effort.

The I&C Section is responsible for digital process equipment and control of its attendant software/firmware. Other groups may have control over specific related issues such as electrical relay setpoints, but in all cases there is a high degree of focus on configuration control practices to ensure that undocumented changes are prevented.

One of the required support functions will be the development or revision of appropriate post-maintenance tests. This is typically performed by the discipline's maintenance engineering group. The most common method of implementation is in the form of a test procedure which verifies the configuration and validity of software values and tests all of the functions demanded of the device while in operation. The test will be performed as a function of the work order activity sequencing.

Interrogatory 11:

What disciplinary action is taken, if any, for maintenance personnel who inadvertently cause trips or other misoperation of systems as a result of maintenance

or surveillance activities? What tracking or documentation is made of who caused such actions?

Answer to Interrogatory 11:

It has been the policy of PG&E to enhance and improve work performance in all areas by means of clear communication to and understanding of performance requirements by all employees. To this end, PG&E utilizes Positive Discipline to:

1. Improve communications between supervisors and employees.
2. Improve knowledge and understanding by individuals of performance expectations.
3. Communicate the expectation of change and improvement through coaching and counseling.

Employees must meet certain standards of performance and perform their jobs in a safe and effective manner. Supervision is responsible for establishing employee awareness of job requirements, and employees, in turn, are responsible for meeting these standards and expectations.

Positive Discipline is a system that emphasizes an individual's responsibility for managing their performance and behavior. It focuses on communicating an expectation of change and improvement in a personal, adult, non-threatening way; while at the same time, maintaining concern for the seriousness of the situation. Key aspects of this system include recognizing and encouraging good performance, correcting performance problems through coaching and counseling, and building commitment to effective work standards and safe work practices.

Disciplinary actions which can be taken in the area of job performance are: an oral reminder, written reminder, decision making leave, and termination.

If a maintenance person makes a mistake and inadvertently trips the unit or misoperates a system, the circumstances are reviewed and a root cause is determined. The Positive Discipline system is used to correct deficient performance and build commitment (not merely compliance) to expected performance in a manner that is fair and equitable. Each step is a reminder of expected performance, stressing decision making and individual responsibility, not punishment.

Each employee has a personnel record where copies of all positive discipline are maintained for a certain period of time; 6 months for an oral reminder and 12 months for a written reminder or a decision making leave.

Interrogatory 12:

What action is taken to verify proficiency of maintenance personnel to perform complex tasks on safety-related and important-to-safety equipment? How often is this verified?

Answer to Interrogatory 12:

PG&E has previously answered this interrogatory. See Answer to Interrogatory 18 and Answer to Interrogatory 20 of PG&E's "Response to First Set of Interrogatories and Request for Production of Documents by San Luis Obispo Mothers for Peace (Re: Contention I)," dated March 12, 1993.

Interrogatory 13:

What actions do personnel take to locate and identify the effects of aging of components? What aging effects are not detectable by visual or physical inspection during maintenance or surveillance activities? What methods are used to detect non-visible effects resulting from aging?

Answer to Interrogatory 13:

PG&E has previously answered the first part of this interrogatory. PG&E's existing maintenance and surveillance programs assure that the effects of aging on components are monitored and components are repaired or replaced when needed. See Answers to Interrogatories 1 and 6, and Answers to Document Requests 5, 6, 10, 11, and 21, in PG&E's "Response to First Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace (Re: Contention I)," dated March 12, 1993.

Examples of aging effects which are not readily detectable during normal maintenance or surveillance (and therefore are subject to special monitoring activities and/or to replacement prior to the end of design life where necessary) include elastomer degradation, insulation degradation, and neutron embrittlement.

Examples of maintenance and surveillance activities which assist in detecting aging effects (external and internal) include disassembly inspections, component replacements, and trending of operational data. These programs, in conjunction with the design of the SSCs and industry experience, are structured to help ascertain degradation of equipment or components that is not readily noticeable by physical inspection. In addition, preventive

maintenance activities are intended to provide for SSC replacement prior to reaching end-of-life condition due to aging effects. Preventive maintenance, trending, and surveillance activities, in conjunction with design and industry experience, assist in identifying aging effects not readily detectable by visual or physical inspection.

Interrogatory 14:

How do you detect the effects of erosion/corrosion on safety related components or non-safety related components in the vicinity of safety-related components?

Answer to Interrogatory 14:

PG&E's comprehensive Erosion/Corrosion (E/C) Monitoring Program under procedures NPAP D-300/NPG 2.20 effectively identifies, monitors and mitigates E/C degradation in susceptible plant piping and components, both safety-related and non-safety-related. The program involves identification of susceptible piping/components using a defense-in-depth philosophy. This philosophy includes industry-standard computer codes, as well as consideration of industry and DCPD experience. Wall thicknesses are measured using primarily ultrasonic (UT), and, in some cases, radiographic (RT) techniques. Plant operating conditions are monitored by program personnel so as to adjust computer models and inspection scope if warranted.

Interrogatory 15:

How do you insure the environmental qualification of a component has not been effected (sic) by the actions of maintenance or surveillance? What tests do you employ to

assure the Environmental Qualified life of an item has not been effected (sic)?

Answer to Interrogatory 15:

Procedural controls established by NPAP D-756, "Maintenance and Surveillance of Electrical and I&C Environmentally Qualified (EQ) Equipment", ensure that the environmental qualification of a component is not adversely affected by the action of maintenance or surveillance. Several key instructions from NPAP D-756 relating to the actions of maintenance and surveillance are summarized below:

1. All maintenance activities on EQ equipment shall be performed by approved procedures that are clearly identified as EQ related.
2. All EQ electrical and I&C equipment shall be identified by each responsible group, using an orange color code if possible.
3. All personnel involved in the EQ Program shall receive appropriate training in order to perform their function without affecting the integrity of the EQ equipment.
4. EQ electrical and I&C equipment environmentally qualified to NUREG-0588, Category II criteria, when replaced, shall be replaced with equipment qualified to NUREG-0588, Category I criteria, unless sound reasons to the contrary can be established. (Therefore, certain EQ equipment is upgraded through the implementation of maintenance and surveillance as required by 10 CFR 50.49 and Regulatory Guide 1.89.)
5. Non-company repairs to EQ equipment must be performed only by service organizations included in the Qualified Supplier List,

or special provisions must be made to assure complete control over actual work.

The electrical and I&C maintenance departments track and schedule implementation of these EQ maintenance requirements. EQ-related Maintenance Procedures and Surveillance Test Procedures provide sufficient instruction, along with specified quality control (QC) hold points, to ensure that EQ-related maintenance and surveillance are implemented in a manner that will not adversely affect the environmental qualification of a component. Furthermore, Maintenance Procedures and Surveillance Test Procedures associated with DCPD EQ equipment include preventive maintenance and surveillance test activities which assure proper performance and ongoing Environmental Qualification of environmentally qualified equipment.

Typical maintenance and surveillance activities which assure the Environmental Qualified life of an item has not been affected include the following:

1. Motor Operated Valves: The regularly performed maintenance activities are meggering and visual checks for degradation and grease quality and quantity.
2. Motors: The regularly performed maintenance activities include high potential tests, oil changes, and disassembly inspections. Measured parameters include leakage current versus voltage, polarization index (for high voltage motors) and megger readings (for low voltage motors).

3. Miscellaneous Electrical Devices: Maintenance activities typically include megger readings and visual inspections.
4. Cables, Penetrations, and Splices: This equipment is generally meggered as part of the connected device megger readings. In addition, visual inspection and insulation resistance testing of a representative sample are performed on a periodic basis.
5. I&C Devices: Maintenance activities typically include calibration checks and megger readings.
6. Telatemp temperature recording stickers are used to provide general information on the ambient conditions in which EQ equipment is operating.
7. Maintenance and surveillance data associated with EQ equipment are reviewed periodically to identify any trends or unusual characteristics that may indicate premature degradation or loss of EQ integrity.

Any sub-component or component replacement required as a result of a limited qualified life for particular EQ equipment (e.g., qualified life expires prior to the end of the plant life) is scheduled and implemented by the responsible maintenance department.

Interrogatory 16:

In implementing the secondary objective of the Preventive Maintenance Program of the Maintenance Department (AP C-750, p. 1) which is "to optimize the relationship between operating costs and the equipment's contribution to profit . . ." what measures of the "operating costs" and the "contribution to profit" are available to the maintenance personnel for use in making decisions related

to this objective? Please provide sample copies of the data and/or measures used in these decisions.

Answer to Interrogatory 16:

Direct measurement of "operating costs" and the "contribution to profit" are not made as they relate to maintenance activities on systems as components. Because cost and profit are related to equipment reliability and performance, they are factored into the overall determination of PM scope and frequency.

An annual review of our PM effectiveness is performed in accordance with AP C-62S1 "Living Program, Data Collection/Annual Review." The example shown in Section 2.4.1 (page 2 of AP C-62S1) illustrates this secondary objective.

Interrogatory 17:

Please provide the procedures for conducting the cost/benefit analysis discussed as one of the criteria for evaluating the scope and frequency of specific PM tasks (AP C-750, p. 4).

Answer to Interrogatory 17:

PG&E is providing section 4.2.4 of procedure AP C-62S2, "Living Program, Evaluation of Recommendations."

Interrogatory 18:

Does the Maintenance Department or other DCNPP organization conduct any analyses of the trends in overdue PM activities? Provide a copy of such analyses for as many of the last four years as they may be available. Please provide a hard copy of the most recent quarterly report of overdue PM activities sorted by priority.

Answer to Interrogatory 18:

Yes. PG&E is providing the chart "PMs Over 125%" which shows the overall trend in PM backlog for each of the last four years. PG&E is also providing a hard copy of the weekly report of PM activities sorted by maintenance discipline and priority. Note that the 49 items listed are approximately 3.3% of the 1,495 PM items performed within the past three months.

Interrogatory 19:

Please explain the grace period concept for rescheduling overdue PM activities (as discussed in AP C-450, p. 9). Verify that this concept does not extend the required end date or any other intervals such as those established by tech specs? What criteria were used in deciding that "overdue PM tasks may be rescheduled within a grace factor of 1.25" as opposed to any other value?

Answer to Interrogatory 19:

The grace period concept is based on criteria contained within the Facility Operating License, Technical Specifications, LCO (Limiting Condition for Operation) 4.0.2:

"Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval."

Because PM testing is contained within the envelope of conservatism for surveillance testing, the same criteria are used for both.

Interrogatory 20:

What actions are taken to protect software or firmware from the existence of computer virus which may be undetectable through normal means but may represent a potential misoperation of the device controlled by the software or firmware?

Answer to Interrogatory 20:

No software or firmware is used to perform a safety-related function. In a few isolated cases (e.g., condensate polisher), firmware is used to control non-safety-related devices. These systems back up electrical and mechanical methods for device control as part of a defense-in-depth design. Additionally, these systems are stand-alone, non-networked, non-PC systems with proprietary operating systems that are firmware-implemented. (Nearly all viruses are introduced through PCs using the DOS operating system and software.) All of these systems come under a stringent Software Quality Assurance Program which requires independent firmware testing and virus prevention before the systems are used, and periodic testing once the systems are in use.

Interrogatory 21:

For the PM programs related to the Mechanical, the Electrical and the Instrumentation and Control Departments, state the approximate percentage of time for maintenance personnel spent in the following activities:

- (a) scheduling maintenance;
- (b) planning maintenance;
- (c) performing maintenance;
- (d) documenting maintenance.

Please answer the same questions for surveillance.

Answer to Interrogatory 21:

It is assumed that the question relates to the relative distribution of manpower resources among the stated general

categories of work when considering the Maintenance Department as a whole. By way of comparison, the PM and STP values are compared to those determined for Corrective Maintenance (CM) (all values are given as percents):

<u>CATEGORY</u>	<u>PM</u>	<u>STP</u>	<u>CM</u>	<u>TOTALS</u>
Scheduling	3	1	5	9
Planning	2	1	12	15
Performing	34	13	25	72
Documenting	2	1	1	<u>4</u>
				100%

Interrogatory 22:

Please provide a complete copy of ALAB-763, March 20, 1984, including the reference cited on page 1-1 of the Pacific Gas & Electric Company Q-List.

Answer to Interrogatory 22:

This document is available to MFP in the Public Document Room. See 10 C.F.R. § 2.740(b)(1); see also Discovery and Scheduling Order, at 3. In addition, MFP was a party to the proceeding in which ALAB-763 was issued, and received a copy of the decision via the service list.

II. Contention V -- Thermo-Lag Compensatory Measures

Interrogatory 23:

Please state your name, position, employer, and business address.

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Answer to Interrogatory 23:

Information sought by this Interrogatory as well as Interrogatories 24-30 is set forth in the attached individual affidavits of fire watch personnel for the relevant time period and specified locations identified in the instructions immediately preceding these interrogatories. Three individuals who performed fire watches during this period are no longer employed at Diablo Canyon and are not available to sign individual affidavits. They are:

Konni Melin - Badge No. 157

Kevin Williams - Badge No. 284

Darlene Wilson - Badge No. 334

They were all employed by Bechtel Power Company, P.O. Box 760, Avila Beach, California 93424.

Interrogatory 24:

Please indicate the inclusive periods which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24:

See attached individual affidavits of the relevant fire watch personnel. The inclusive periods of fire watch duties at Diablo Canyon for the other three individuals are set forth below:

Konni Melin - June 1992-January 4, 1993

Kevin Williams - June 1992-April 2, 1993

Darlene Wilson - June 1992-February 4, 1993

Interrogatory 25:

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25:

See attached individual affidavits of the relevant fire watch personnel. The training for fire watch duties given to the other three fire watch personnel is set forth below:

Konni Melin - January 14, 1988

Kevin Williams - November 19, 1990

Darlene Wilson - March 20, 1987

Interrogatory 26:

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26:

See attached individual affidavits of the relevant fire watch personnel. The fire watch training procedure for Melin, Williams and Wilson was conducted in accordance with NPAP B-13 and NPAP C-113. The additional information sought in this interrogatory pertaining to these individuals is found in the fire watch logs which will be made available for inspection.

Interrogatory 27:

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27:

See attached individual affidavits of the relevant fire watch personnel. The fire watch logs containing any such information for Melin, Williams and Wilson in response to this interrogatory will be made available for inspection.

Interrogatory 28:

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28:

See attached individual affidavits of the relevant fire watch personnel. The fire watch logs containing any such information for Melin, Williams and Wilson will be made available for inspection.

Interrogatory 29:

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29:

See attached individual affidavits of the relevant fire watch personnel. The fire watch logs containing any such information for Melin, Williams and Wilson will be made available for inspection.

Interrogatory 30:

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

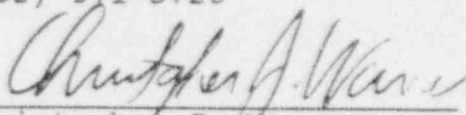
Answer to Interrogatory 30:

See attached individual affidavits of the relevant fire watch personnel. Melin, Williams and Wilson did not perform any other duties while assigned to fire watch duties at Diablo Canyon.

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  
Law Department, B30A  
77 Beale Street  
San Francisco, CA 94106

Attorneys for Pacific Gas and  
Electric Company

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:	)	
	)	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

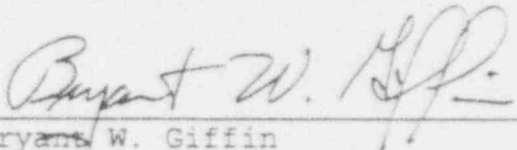
I, Bryant W. Giffin, being duly sworn, hereby state as follows.

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

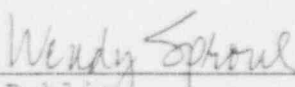
(805) 545-4168

3. I have provided the information which forms the basis for the answers to Interrogatories 2, 5, 6, 7, 9, 10, 11, 13, 15, 16, 17, 18, 19, and 21 included in the attached "Pacific Gas and Electric Company's Response to Third 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

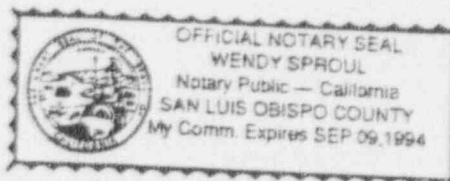
STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO SS.

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

  
Notary Public

9-9-94

My commission expires:



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
	)	50-323-OLA
(Diablo Canyon Nuclear Power	)	(Construction Period
Plant, Units 1 and 2)	)	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 Interrogatory 1 included in the attached "Pacific Gas and Electric Company's Response to Third 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

Sworn and subscribed to before  
me this 9<sup>th</sup> day of April, 1993

B. E. Zelnik  
\_\_\_\_\_  
Notary Public

July 30, 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  
 ) 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.

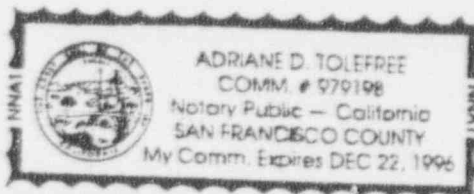
1. I am employed by Pacific Gas and Electric Company as Interim Manager, Nuclear Construction Services.
2. My business address and phone number are:  
  
333 Market Street, Room A1411  
San Francisco, CA 94105  
  
(415) 973-1252
3. I have provided the information which forms the basis for the answers to Interrogatories 13 and 14 included in the attached "Pacific Gas and Electric Company's Response to Third 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.

*Richard C. Anderson*

Richard C. Anderson

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

*Adriane D. Tolefree*  
Notary Public



December 22, 1996

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, Damien P. Brooks, being duly sworn, hereby state as follows.

1. I am employed by Pacific Gas and Electric Company as Director,  
Computer Engineering.

2. My business address and phone number are:

Diablo Canyon Power Plant  
104/6/601  
P. O. Box 56  
Avila Beach, CA 93424

(805) 545-4712

3. I have provided the information which forms the basis for the  
answers to Interrogatory 20 included in the attached "Pacific Gas  
and Electric Company's Response to Third 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.

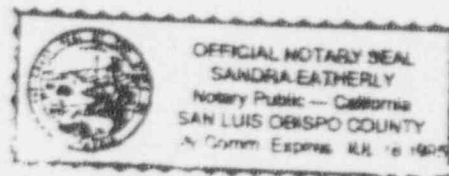
*Damien Brooks*

Damien P. Brooks

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO  
Sworn and subscribed to before  
me this 9TH day of April, 1993

*Sandra Eatherly*  
Notary Public

7/18/95  
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, David K. Cosgrove, being duly sworn, hereby state as follows.

1. I am employed by Pacific Gas and Electric Company as Supervisor, Safety and Fire Protection.

2. My business address and phone number are:

Diablo Canyon Power Plant  
104/4/28A  
P. O. Box 56  
Avila Beach, CA 93424

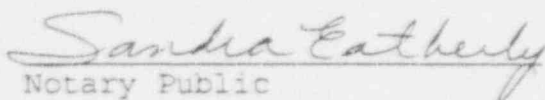
(805) 545-4319

3. I have provided the information which forms the basis for the answers to Interrogatories 23, 24, 25, 26, 27, 28, 29, and 30 included in the attached "Pacific Gas and Electric Company's Response to Third Set of Interrogatories and Request for Production of Documents Filed by San Luis Obispo Mothers for Peace."

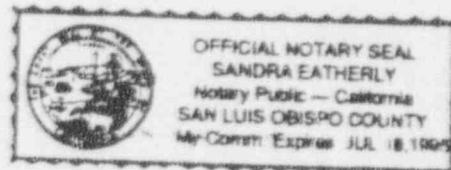
4. The information contained in the referenced interrogatory answers and responses to requests for documents is true and correct to the best of my knowledge and belief.

  
David K. Cosgrove

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO  
Sworn and subscribed to before  
me this 9th day of April, 1993

  
Notary Public

7/18/95  
My commission expires:



AFFIDAVIT

*C KCE*  
I, Ken *X*. Evans, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

*C KCE*  
My name is Ken *X*. Evans. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials ~~KIM~~ and/or badge number, LJ#156, copies of which will be made available for inspection and copying.

*KCE* *X*

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on February 10, 1983 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials ~~KIM~~ and/or badge number, LJ#156, copies of which will be made available for inspection and copying.

KCE

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials ~~KLM~~ and/or badge number, LJ# 156, copies of which will be made available for inspection and copying. KCE HCE

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials ~~KLM~~ and/or badge number, LJ# 156, copies of which will be made available for inspection and copying. KCE HCE

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

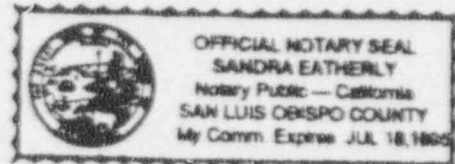
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Ken C. Evans*  
Ken C. Evans  
C. HEE

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 7, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

AFFIDAVIT

I, Leroy Silva, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is Leroy Silva. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials LS and/or badge number, LJ#160, copies of which will be made available for inspection and copying.

#### Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or regualification training.

#### Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on July 10, 1984 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

#### Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

#### Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

#### Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

#### Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials LS and/or badge number, LJ#1120, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials LS and/or badge number, LJ# 1160, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials LS and/or badge number, LJ# 1160, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

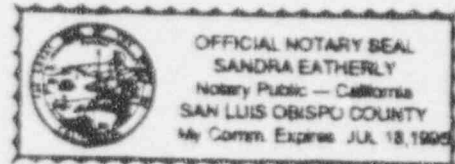
The information contained in this affidavit is true and correct  
to the best of my knowledge and belief.

*Leroy O. Silva*  
Leroy Silva

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 7, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

AFFIDAVIT

I, Steven P. Sorheim, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is Steven P. Sorheim. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials SP and/or badge number, LJ#161, copies of which will be made available for inspection and copying.

#### Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or regualification training.

#### Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on February 1, 1984 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

#### Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

#### Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

#### Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

#### Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials SPS and/or badge number, LJ#161, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials SPS and/or badge number, LJ#161, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials SPS and/or badge number, LJ#161, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

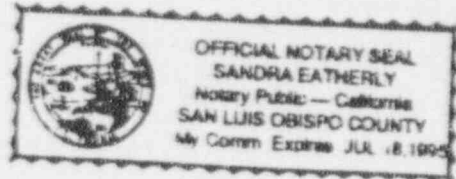
Steven P. Sorheim

*Steven P. Sorheim*

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 4-7, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

# AFFIDAVIT

I, Robert F. Weber, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Robert F. Weber. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials RFW and/or badge number, LJ#165, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on February 10, 1983 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials RFW and/or badge number, LJ#165, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials RFW and/or badge number, LJ#165, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials RFW and/or badge number, LJ#165, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

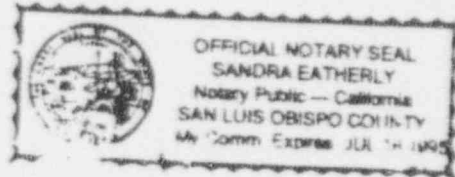
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Robert F. Weber*  
Robert F. Weber

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 7, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

# AFFIDAVIT

I, Robert L. Turner, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Robert L. Turner. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials RLT and/or badge number, LJ#29, copies of which will be made available for inspection and copying.

#### Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

#### Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on February 10, 1988 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

#### Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

#### Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

#### Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

#### Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials RLT and/or badge number, LJ#29, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials RLT and/or badge number, LJ#29, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials RLT and/or badge number, LJ#29, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

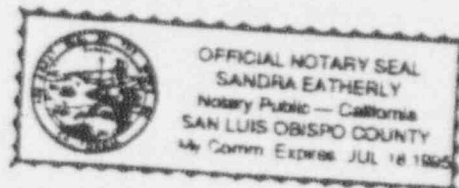
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Robert L. Turner*  
Robert L. Turner

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 8, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

AFFIDAVIT

ALLAN T. EVANS ATE

I, ~~Evans T. Allan~~, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

ALLAN T. EVANS ATE  
My name is ~~Evans T. Allan~~. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials ATE and/or badge number, LJ# 177, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on September 21, 1989 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials ATE and/or badge number, LJ#177, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials ATE and/or badge number, LJ# 177, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials ATE and/or badge number, LJ# 177, copies of which will be made available for inspection and copying.


Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

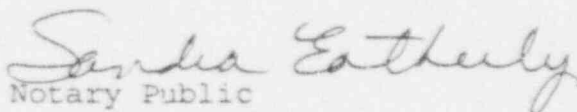
I have performed no other duties while assigned to fire watch duties during this period.

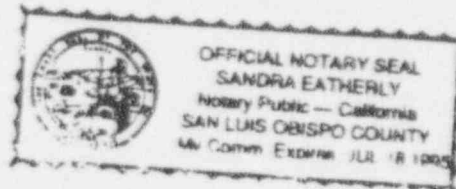
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

  
~~Evans T. Allan~~  
ALLAN T. EVANS

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 8, 1993

  
Notary Public



My Commission expires: 7/18/95

AFFIDAVIT

DENZEL L. ALLISON ~~DLA~~  
I, ~~Allison L. Denzel~~, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

DENZEL L. ALLISON ~~DLA~~  
My name is ~~Allison L. Denzel~~. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials DLA and/or badge number, LJ#193, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on August 4, 1989 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mother for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials DLA and/or badge number, LJ#193, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials DLA and/or badge number, LJ#193, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials DLA and/or badge number, LJ#193, copies of which will be made available for inspection and copying.


Interrogatory 30


Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

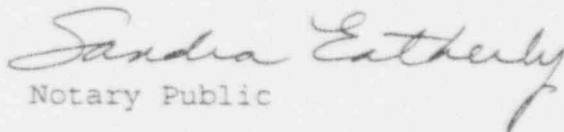
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

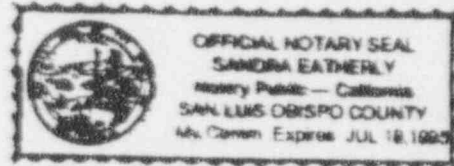
  
Allison L. Denzel

DENZEL L. ALLISON 

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 1, 1993

  
Notary Public



My Commission expires: 7/18/95

# AFFIDAVIT

I, Lola-Marie A. Leaver, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Lola-Marie A. Leaver. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials LAL and/or badge number, LJ#233, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on October 17, 1989 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials LAL and/or badge number, LJ#233, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials LAL and/or badge number, LJ#233, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials LAL and/or badge number, LJ#233, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

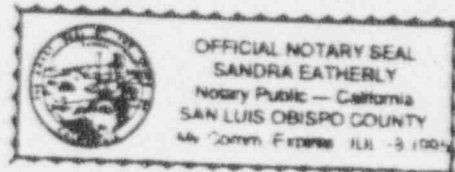
*Lola Marie A. Leaver*  
Lola-Marie A. Leaver

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

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

*Sandra Eatherly*  
Notary Public

My Commission expires: 7/18/95



# AFFIDAVIT

I, Charlene M. Eckman, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Charlene M. Eckman. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials CME and/or badge number, LJ#249, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or regualification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on February 21, 1990 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials CME and/or badge number, LJ#249, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials CME and/or badge number, LJ#249, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials CME and/or badge number, LJ#249, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

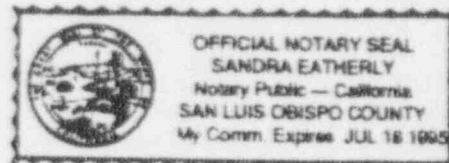
The information contained in this affidavit is true and correct  
to the best of my knowledge and belief.

*Charlene M. Eckman*  
Charlene M. Eckman

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 8, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

# AFFIDAVIT

I, Cheryl L. Schaffer, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Cheryl L. Schaffer. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials CLS and/or badge number, LJ#250, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on February 21, 1990 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials CLS and/or badge number, LJ#250, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials CLS and/or badge number, LJ#250, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials CLS and/or badge number, LJ#250, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

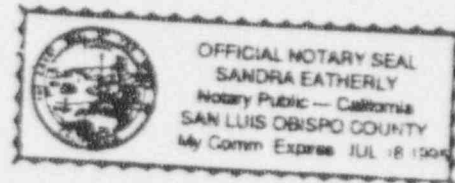
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Cheryl L. Schaffer*  
Cheryl L. Schaffer

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 7, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

AFFIDAVIT

I, Marilyn F. Rockwell, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is Marilyn F. Rockwell. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials MFR and/or badge number, LJ#271, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or regualification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on Augsut 10, 1990 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials MFR and/or badge number, LJ#271, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials MFR and/or badge number, LJ#271, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials MFR and/or badge number, LJ#271, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

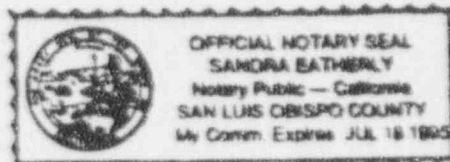
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Marilyn F. Rockwell*  
Marilyn F. Rockwell

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

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

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

# AFFIDAVIT

I, Veronica Morrison, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Veronica Morrison. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials VM and/or badge number, LJ#272, copies of which will be made available for inspection and copying.

#### Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

#### Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on August 21, 1990 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

#### Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

#### Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

#### Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

#### Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials VM and/or badge number, LJ#272, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials VM and/or badge number, LJ#272, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials VM and/or badge number, LJ#272, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

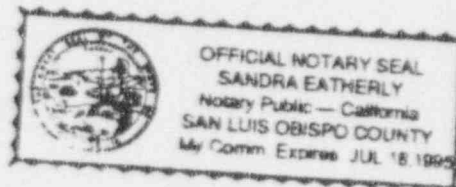
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Veronica Morrison*  
Veronica Morrison

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 8, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

AFFIDAVIT

I, Kathie A. Brooks, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is Kathie A. Brooks. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials KAB and/or badge number, LJ#153, copies of which will be made available for inspection and copying.

274 KAB

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on August 10, 1990 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials KAB and/or badge number, LJ#~~151~~, copies of which will be made available for inspection and copying.

274 KAB

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials KAB and/or badge number, LJ#153, copies of which will be made available for inspection and copying.

274 KAB

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials KAB and/or badge number, LJ#153, copies of which will be made available for inspection and copying.

274 KAB

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

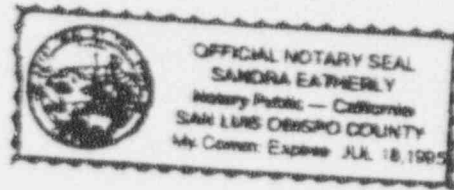
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Kathie A. Brooks*  
Kathie A. Brooks

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 8, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

AFFIDAVIT

I, Michael <sup>W. 1/14</sup> Johnson, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is Michael <sup>W. 1/2</sup> Johnson. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials ~~MJS~~ and/or badge number, LJ#278, copies of which will be made available for inspection and copying.

MWT / 1/2

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PC&E or some other organization). The word "training" includes both original and refresher or regualification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on August 21, 1990 of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials ~~MRJ~~ and/or badge number, LJ#278, copies of which will be made available for inspection and copying. MWJ

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials ~~MWJ~~ and/or badge number, LJ#278, copies of which will be made available for inspection and copying. *MWJ*

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials ~~MWJ~~ and/or badge number, LJ#278, copies of which will be made available for inspection and copying. *MWJ*

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

The information contained in this affidavit is true and correct  
to the best of my knowledge and belief.

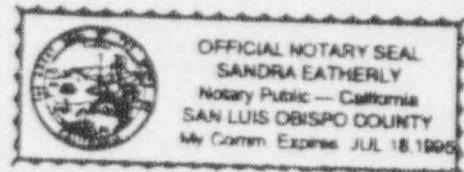
*Michael W. Johnson*  
Michael W. Johnson

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 8, 1993

*Sandra Eatherly*  
Notary Public

My Commission expires: 7/18/95



AFFIDAVIT

I, Gerard E. Nickett, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is Gerard E. Nickett. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 117  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials GEN and/or badge number, LJ# 327, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or regualification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials GEN and/or badge number, LJ#327, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials GEN and/or badge number, LJ# 327, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials GEN and/or badge number, LJ# 327, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Gerard E. Nickett*  
Gerard E. Nickett

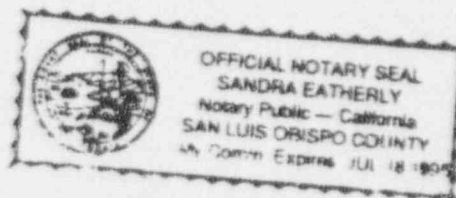
STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

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

*Sandra Eatherly*  
Notary Public

My Commission expires:

*7/18/95*



AFFIDAVIT

I, Sandy M. Baker, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is Sandy M. Baker. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 117  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials SMB and/or badge number, LJ#257, copies of which will be made available for inspection and copying.

237 S.M.B.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or regualification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials SMB and/or badge number, LJ#~~259~~, copies of which will be made available for inspection and copying.

237 S.M.B.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials SMB and/or badge number, LJ#257, copies of which will be made available for inspection and copying.

237 S.M.B.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials SMB and/or badge number, LJ#257, copies of which will be made available for inspection and copying.

237 S.M.B.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

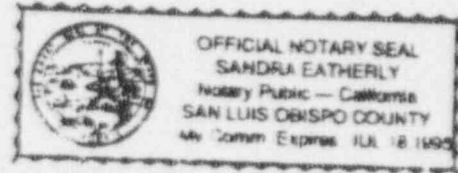
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Sandy M. Baker*  
Sandy M. Baker

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

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

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

# AFFIDAVIT

I, Norma R. Hanz, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Norma R. Hanz. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 117  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials NRH and/or badge number, LJ#276, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials NRH and/or badge number, LJ#276, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials NRH and/or badge number, LJ#276, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials NRH and/or badge number, LJ#276, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

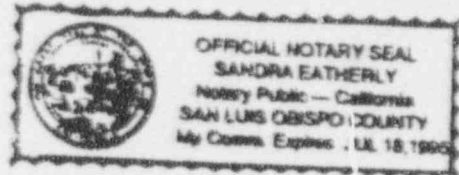
*Norma R. Hanz*  
Norma R. Hanz

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

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

*Sandra Eatherly*  
Notary Public

My Commission expires: 7/18/95



# AFFIDAVIT

I, Ana M. Donaghy, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Ana M. Donaghy. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 117  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials AMD and/or badge number, LJ# 320, copies of which will be made available for inspection and copying.

#### Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or regualification training.

#### Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

#### Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

#### Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

#### Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

#### Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials AMD and/or badge number, LJ# 320, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials AMD and/or badge number, LJ# 320, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials AMD and/or badge number, LJ# 320, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

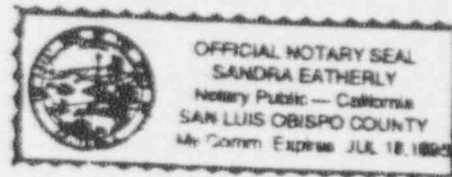
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Ana M. Donaghy*  
Ana M. Donaghy

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 7, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

# AFFIDAVIT

I, Elizabeth T. Sumpter, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Elizabeth T. Sumpter. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 117  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials ETS and/or badge number, LJ#\_\_\_\_\_, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or regualification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials ETS and/or badge number, LJ#\_\_\_\_\_, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials ETS and/or badge number, LJ#\_\_\_\_, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials ETS and/or badge number, LJ#\_\_\_\_, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

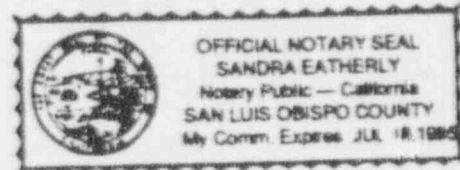
The information contained in this affidavit is true and correct  
to the best of my knowledge and belief.

*Elizabeth T. Sumpter*  
Elizabeth T. Sumpter

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 7, 1993

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

# AFFIDAVIT

I, Raymond L. Kurtz, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

## Interrogatory 23

Please state your name, position, employer, and business address.

## Answer to Interrogatory 23

My name is Raymond L. Kurtz. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 117  
Avila Beach, CA 93424

## Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

## Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials RLK and/or badge number, LJ#172, copies of which will be made available for inspection and copying.

#### Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or regualification training.

#### Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

#### Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

#### Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

#### Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

#### Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials RLK and/or badge number, LJ# 172, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials RLK and/or badge number, LJ#172, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials RLK and/or badge number, LJ#172, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

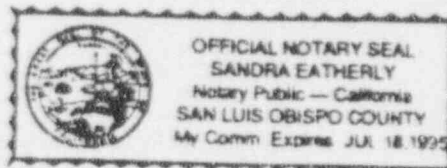
The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*Raymond L. Kurtz*  
Raymond L. Kurtz

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

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

*Sandra Eatherly*  
Notary Public



My Commission expires: 7/18/95

AFFIDAVIT

I, Peter <sup>A. Phillips</sup>, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is Peter <sup>A. Phillips</sup>. I am employed by American Protective Services as a Security Officer at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 56  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed one hourly fire watch in one area containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993 as a temporary substitute for a Firewatch who had access problems.

(The fire area subject to the interrogatories is Fire Area 30-A-5, Units 1 and 2 Intake Structure.

The fire area in which I performed this fire watch, and the date and time of the fire watch, is identified in the fire watch logs by reference to my initials PAP and/or badge number, #1147, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above,

when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on 3/28/93 of General Employee Fire Protection Training Class #GEFA310. I also received instruction from the dedicated firewatch who was denied access.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed this fire watch in accordance with the fire watch procedures under NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watch I performed during this period in the fire area identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials PAP and/or badge number, #1147, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the

conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials PAP and/or badge number, #1147, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials PAP and/or badge number, #1147, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I performed no other duties while assigned to fire watch duties during this period.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

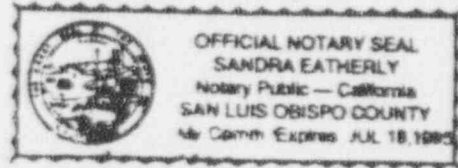
<sup>As per</sup>  
Peter G. Phillips  
*Peter G. Phillips*

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

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

*Sandra Eatherly*  
Notary Public

My Commission expires: 7/18/95



AFFIDAVIT

I, Lewis V. White<sup>XKW</sup>, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is Lewis V. White<sup>XKW</sup>. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials LVW and/or badge number, LJ#300, copies of which will be made available for inspection and copying.

#### Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

#### Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

#### Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

#### Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

#### Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

#### Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials LVW and/or badge number, LJ# 300, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials LVW and/or badge number, LJ# 300, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials LVW and/or badge number, LJ# 300, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

The information contained in this affidavit is true and correct  
to the best of my knowledge and belief.

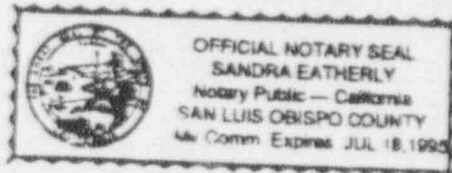
*Lewis V. White*

Lewis V. White *X* *L/VW*

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

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

*Sandra Eatherly*  
Notary Public



My Commission expires:

*7/18/95*

AFFIDAVIT

I, William A. Ice, being duly sworn, hereby state as follows:

The following answers are provided in response to interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993. The answers are provided immediately following the relevant interrogatory.

Interrogatory 23

Please state your name, position, employer, and business address.

Answer to Interrogatory 23

My name is William A. Ice. I am employed by Bechtel Construction Company under contract to Pacific Gas and Electric Company as a fire watch at the Diablo Canyon Nuclear Power Plant. My business address is:

P. O. Box 670  
Avila Beach, CA 93424

Interrogatory 24

Please indicate the inclusive periods during which you performed fire watches at Diablo Canyon Nuclear Power Plant, Units 1 and/or 2, within the conditions set forth above.

Answer to Interrogatory 24

During the period June 24, 1992 to present, I performed hourly fire watches in the five fire areas containing Thermo-Lag fire barrier materials identified in the paragraph preceding interrogatories 23 through 30 of Intervenor San Luis Obispo Mothers For Peace Third Set of Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company dated March 8, 1993.

(The five fire areas subject to the interrogatories are Fire Area 5-A-4, Unit 1 480 V Switchgear Room; Fire Area 5-B-4, Unit 2 480 V Switchgear Room; Fire Area 30-A-5, Units 1 and 2 Intake Structure; Fire Area 10, Unit 1 12-kV Switchgear Room; and Fire Area 20, Unit 2 12-Kv Switchgear Room.)

The fire areas in which I performed these fire watches, and the dates and times of the fire watches, are identified in the fire watch logs by reference to my initials WAI and/or badge number, LJ# 256, copies of which will be made available for inspection and copying.

Interrogatory 25

Please indicate, for the inclusive period identified above, when you received training for the duties which you performed. In addition, please indicate who provided the training (i.e., PG&E or some other organization). The word "training" includes both original and refresher or requalification training.

Answer to Interrogatory 25

For the period June 24, 1992 to present, I was qualified to perform fire watches by reason of my completion on of Fire Watch Training in accordance with Nuclear Power Plant Administrative Procedure (NPAP) B-13.

Interrogatory 26

Please identify the procedure(s) which you used in performing the fire watches within the conditions set forth above, and provide copies of the procedure(s) (including completed checklists for all fire watches, to the extent that such checklists were used).

Answer to Interrogatory 26

I performed all these fire watches in accordance with the fire watch procedures under previously mentioned NPAP B-13, as well as NPAP C-113 "FIRE SYSTEM IMPAIRMENT." I understand copies of these procedures were previously provided to the Mothers for Peace. In addition, the fire watch logs for this period of time record the fire watches I performed each day during this period in the fire areas identified in Interrogatory 24, above. Copies of these fire watch logs will be made available for inspection and copying.

Interrogatory 27

Please identify (by date, fire area, and unit) any missed or late fire watches within the conditions set forth above, and copies of documents which record occurrences of missed or late fire watches.

Answer to Interrogatory 27

Any missed or late fire watches assigned to me during this period would have been identified in the fire watch logs which references my initials WAI and/or badge number, LJ# 256, copies of which will be made available for inspection and copying.

Interrogatory 28

Please identify any open fire area doors which you identified during the course of your fire watches within the conditions set forth above, and provide copies of documents which record occurrences of open fire doors.

Answer to Interrogatory 28

Any open fire doors identified by me during the course of my fire watch details would have been identified in the fire watch logs which references my initials WAI and/or badge number, LJ# 256, copies of which will be made available for inspection and copying.

Interrogatory 29

Please identify any discrepant conditions which you noted during the course of your fire watches within the conditions set forth above, and provide copies of any documents which record those discrepant conditions.

Answer to Interrogatory 29

Any "discrepant conditions," including open fire doors, would have been noted during the course of my fire watches during this time period in the fire watch logs which reference my initials WAI and/or badge number, LJ# 256, copies of which will be made available for inspection and copying.

Interrogatory 30

Please describe any duties which you have performed while assigned to fire watch duties which are unrelated to fire watch duties, identifying when the other duties were performed and at whose instructions or directions these duties were performed.

Answer to Interrogatory 30

I have performed no other duties while assigned to fire watch duties during this period.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

*William A. Ice*

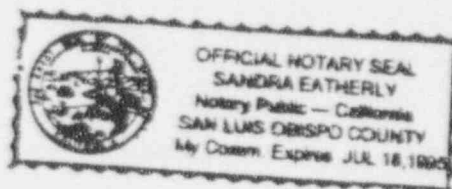
William A. Ice

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

Sworn and subscribed to before  
me this April, day of 8, 1993

*Sandra Eatherly*  
Notary Public

My Commission expires: 7/18/95



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '93 APR 16 P3:31

In the Matter of:

Pacific Gas and Electric Company

(Diablo Canyon Power  
Plant, Units 1 and 2)

)  
)  
)  
)  
)  
)  
)

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

DEPT. OF ENERGY  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

CERTIFICATE OF SERVICE

I hereby certify that copies of "PACIFIC GAS & ELECTRIC COMPANY'S RESPONSE TO THIRD SET OF WRITTEN INTERROGATORIES AND REQUESTS FOR THE PRODUCTION OF DOCUMENTS FILED BY SAN LUIS OBISPO MOTHERS FOR PEACE" 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 April, 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

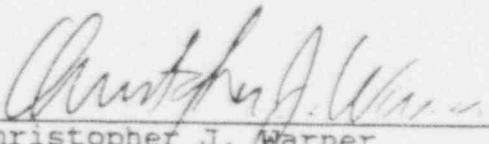
Robert Kinosian  
California Public Utilities  
Commission  
505 Van Ness, Rm. 4102  
San Francisco, CA 94102

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

Joseph B. Knotts, Jr., Esq.  
David A. Repka, Esq.  
Winston & Strawn  
1400 L Street, N.W.  
Washington, DC 20005-3502

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

  
\_\_\_\_\_  
Christopher J. Warner

Counsel for Pacific Gas and  
Electric Company