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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DUCKETING & SERVICE
BRANCH

In the matter of
Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant
Units 1 and 2
Facility Operating Licenses
No. DPR-80 and DPR-82

Docket Nos. 50-275-OLA-2
50-323-OLA-2
ASLBP No. 92-669-03-OLA-2

April 26, 1993

Intervenor San Luis Obispo Mothers for Peace
Motion to Compel Pacific Gas and Electric Company to Respond
to the Second and Third Sets of Interrogatories and
Requests for Production of Documents Filed by
San Luis Obispo Mothers for Peace

On March 8, 1993, the San Luis Obispo Mothers for Peace ("SLOMFP") filed its Second and Third Sets of Written Interrogatories and Requests for Production of Documents to Pacific Gas and Electric Company ("PG&E"). PG&E responded with two documents: PG&E's Response to Second Set of Written Interrogatories and Requests for the Production of Documents Filed by SLOMFP (April 12, 1993) and PG&E's Response to Third Set of Written Interrogatories and Requests for the Production of Documents Filed by SLOMFP (April 12, 1993). For reasons provided below, some of PG&E's responses were insufficient. Pursuant to 10 CFR 2.740(f) and 2.740(a)(3), SLOMFP moves that the Atomic Safety and Licensing Board enter an Order compelling PG&E to answer certain of SLOMFP's interrogatories and requests for documents.

PG&E's Response to Second Set of Written Interrogatories and Requests for the Production of Documents Filed by SLOMFP

Interrogatory 1: In this request, SLOMFP asks PG&E to identify all safety related and important to safety systems, structures, or components at Diablo Canyon Nuclear Power Plant ("DCNPP") that have experienced any type

of degradation and to provide information on these occurrences. PG&E objects to this request as overbroad and burdensome. But SLOMFP requires a comprehensive view of degradation of safety related and important to safety systems, structures and components at the DCNPP and the ability of PG&E's maintenance and surveillance programs to detect and deal with it. This issue is highly relevant to the proceeding and is a reasonable request. SLOMFP would be surprised if PG&E did not keep detailed and organized records tracking degradation of safety-related and important-to-safety systems, structures and components. SLOMFP does not believe that this request is overly broad or burdensome.

Interrogatory 2: SLOMFP requests PG&E's instructions and procedures for maintenance and surveillance for specific components and systems. Additionally, SLOMFP requests that PG&E provide any NCRs, LERs or documents describing quality assurance deficiencies involving these specific systems or components. Although after the April 12 deadline for discovery, PG&E states that it is providing some documents at the plant site for inspection and/or copying. In a separate motion, SLOMFP has requested an extension of time to view these documents at the plant site (April 26, 1993). But SLOMFP asks for it here as well. PG&E also notes that some of these documents were provided for examination at the site visit on March 16, 1993. SLOMFP notes that of the 93 NCRs requested, 8 were provided to SLOMFP. Of the 29 LERs requested, 20 were provided to SLOMFP. No documents describing quality assurance deficiencies involving specific systems or components have been provided. SLOMFP seeks the opportunity to examine all of the above-mentioned documents.

Interrogatory 6: In this interrogatory, SLOMFP is requesting the location of all check valves used in safety-related and important-to-safety applications at DCNPP. PG&E objects to this request as being overbroad. In response to this objection, SLOMFP narrows this request to include a piping and instrumentation drawing for important to safety systems. While these drawings will not include all of the check valves, they would include most of the check valves with safety significance.

Interrogatory 9: SLOMFP has requested copies of all documents evaluating the effectiveness of existing or proposed measures for the monitoring and maintenance of Limitorque motor operators at DCNPP. PG&E's response of "various NRC inspection reports and evaluations" is vague and makes it very unclear to SLOMFP if this is a comprehensive list of documents evaluating the maintenance of Limitorque motor operators at DCNPP. SLOMFP believes that other documents may exist, including consultant and PG&E documents.

Interrogatories 12 and 13: SLOMFP requests INPO documents regarding fire protection and maintenance and surveillance programs, generally and in relation to DCNPP. PG&E claims that this information is privileged and subject to non-disclosure. PG&E does not cite any regulation or case that requires the Board to protect these documents from disclosure. INPO documents are relevant and useful because they provide the industry's own analysis of the effectiveness of safety programs. SLOMFP should have the opportunity to examine these documents.

Interrogatory 14: In this request, SLOMFP asks PG&E to provide a complete, up-to-date set of piping and instrumentation drawings ("P&IDs") for DCNPP. PG&E has objected to this request as overbroad. SLOMFP hereby modifies this interrogatory to request only those PD&Is that are important-to-

safety. These drawings are easily accessible to PG&E and they should be made available to SLOMFP. Again, PG&E agrees to provide these documents at the site prior to April 12. In another motion, SLOMFP requests an extension of time to examine documents at the site [April 26, 1993]. SLOMFP requests this here as well. SLOMFP asks that these documents be made available on May 4, 5 and/or 6, 1993.

Interrogatory 15: SLOMFP has requested that PG&E provide an up-to-date hard copy of sections of the Final Safety Analysis Report ("FSAR") for DCNPP. PG&E refers SLOMFP to the Public Document Room. SLOMFP has been very specific in its request for limited sections of the FSAR. There is no reason for SLOMFP to spend hours in the Public Document Room sifting through revisions on microfiche when PG&E has a current interfiled document on hand. SLOMFP has made a reasonable request.

PG&E's Response to Third Set of Written Interrogatories and Requests for the Production of Documents Filed by SLOMFP

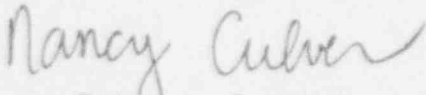
Interrogatory 3: SLOMFP requests a copy of Procedure NPAP D-756 related to Maintenance of Environmental Qualification. PG&E responds that it was provided at the site visit on March 16, 1993. There were a great many documents to review at the site. Because SLOMFP expected to receive this document in connection with Interrogatory 3 and because of the limited time available to SLOMFP at the site, only a portion of this document was copied. SLOMFP requests that this document be provided to SLOMFP - at the site or otherwise. See SLOMFP's Motion for Extension of Time to Examine Documents at DCNPP [April 26, 1993].

Interrogatory 8: In this interrogatory, SLOMFP requests one complete current copy of Action Requests/Quality Plant Problem Reports. PG&E

objects to this request as being overbroad. SLOMFP hereby modifies this request to include only those Action Requests/Quality Plant Problem Reports involving maintenance or surveillance activities at DCNPP.

Interrogatories 23 - 30: In these interrogatories, SLOMFP requests that personnel answer specific questions under oath or affirmation regarding their duties and experiences in their performance of fire watches at DCNPP. PG&E responds with a great many affidavits from personnel. The affidavits promise to provide fire watch log sheets which will answer SLOMFP questions. But SLOMFP has not been told where or when these documents will be made available. Furthermore, SLOMFP specifically requests that the personnel identify by date, fire area, and unit any missed or late fire watches within a specific time frame. This has not been done. The response to this specific request is to reference SLOMFP to these fire watch log sheets which have not been provided. Furthermore, SLOMFP questions whether these fire log sheets will provide the information requested - even if SLOMFP does spend hours sifting through them. SLOMFP requests that PG&E answer the questions.

Respectfully Submitted,



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

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Certificate of Service

I hereby certify that copies of the foregoing San Luis Obispo Mothers for Peace ("SLOMFP") Motion for Extension of Time to Examine Documents at Diablo Canyon Nuclear Power Plant and Intervenor SLOMFP Reply to Pacific Gas and Electric Company's ("PG&E") Motion to Strike in Part SLOMFP Filing Regarding Addendum to FES and Intervenor SLOMFP Motion to Compel PG&E to Respond to the Second and Third Sets of Interrogatories and Requests for Production of Documents Filed by SLOMFP and Intervenor SLOMFP Motion to Compel the NRC Staff to Respond to the First Set of Interrogatories and Request for the Production of Documents Filed by SLOMFP and SLOMFP Motion for Leave to Reply to PG&E's Opposition to Additional Discovery Re: Cables have been served upon the following persons by U.S. mail, first class.

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

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

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

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

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

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

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

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

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

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

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

Jill Zamek

Jill Zamek

Dated April 25, 1993, San Luis Obispo County, CA