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

'93 APR 29 P4:07

Office of Secretary  
Docketing & 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 for Leave to Reply to Pacific Gas and Electric Company's  
Opposition to Additional Discovery Re: Cables

On April 2, 1993, the San Luis Obispo Mothers for Peace ("SLOMFP") filed a Motion for Leave to File Additional Discovery Re: Okonite Cables with Bonded Jackets. Additionally, this motion was accompanied by SLOMFP Supplemental Interrogatories Related to SLOMFP First Set of Written Interrogatories and Requests for the Production of Documents to the NRC Staff Re: Okonite Cables with Bonded Jackets and SLOMFP Supplemental Interrogatories Related to SLOMFP First Set of Written Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company ("PG&E"). On April 19, 1993, PG&E responded by filing an Opposition to Request for Additional Discovery Re Cables. SLOMFP moves for leave to reply to PG&E's opposition to its request for additional discovery. A reply is needed in order to respond to PG&E's argument that environmental qualification is not related to maintenance and surveillance. SLOMFP believes that environmental qualification is an extremely important aspect of maintenance and surveillance. Therefore we seek the Board's leave to reply to PG&E.

PG&E claims that none of the cable failures at Diablo Canyon Nuclear Power Plant ("DCNPP") are related to Contention I - maintenance and surveillance programs that are in question in this proceeding. But

environmental qualification is related to maintenance because the degradation of safety equipment and the ensuing loss of environmental qualification can be due to insufficient maintenance. As a matter of fact, SLOMFP understands that some of the failed cables at DCNPP have been submerged under 3 to 4 feet of water for long periods of time (and degraded) because the sump pump had not been maintained and, in fact, was found inoperable. Additionally, it was discovered that a six-inch ABS conduit appeared to have been broken. NRC Inspection Report 93-03 (April 8, 1993) at 7. Environmental qualification may be a design consideration, but if the actual environment that the equipment was designed to operate in is not being maintained - and in this case it certainly hasn't been - it becomes a maintenance issue.

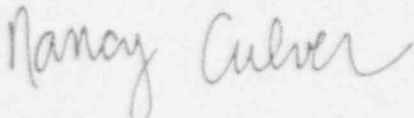
PG&E also remarks that the cable failures at DCNPP on February 5 and March 12, 1993 are irrelevant because neither have Hypalon jackets, but neoprene - without bonded jackets. Regardless of the type of jackets and whether or not they require environmental qualification, it is clear that PG&E is experiencing maintenance difficulties with a variety of cables. Additional discovery is warranted.

PG&E continues to criticize SLOMFP's conduct of discovery, particularly its shortcomings during the site visit. PG&E claims that SLOMFP did not request NCR DC1-92-EM-N054. This is untrue. SLOMFP records show that SLOMFP requested all the NCRs and LERs that were listed as responsive to Interrogatories 12 and 19 and Document Request 22 on Attachment 2 in PG&E's Response to First Set of Interrogatories and Request for Production of Documents Filed by SLOMFP (Re: Contention I) (March 24, 1993). See Attachment A. Of the 93 NCRs listed, PG&E provided the SLOMFP with only 8. Of the 29 LERs listed, PG&E provided SLOMFP with 20. See

SLOMFP Motion for Extension of Time to Examine Documents at DCNPP (April 26, 1993). SLOMFP has requested these "missing" documents in its Motion to Compel PG&E to Respond to the First Set of Interrogatories and Requests for Production of Documents Filed by SLOMFP (Re: Contention I)(March 24, 1993).

PG&E believes that SLOMFP is unjustified in its discovery request because it failed to follow-up on IN 92-81 (December 11, 1992). Yet SLOMFP did not identify this issue as being specific to DCNPP until it learned of the occurrence of the electrical ground on February 5, 1993. SLOMFP learned of this event on March 25, 1993 and responded in a timely manner with appropriate motions and interrogatories. SLOMFP's request for additional discovery regarding the degraded Okonite cables is justified and should be granted.

Respectfully Submitted,



Nancy Culver, President  
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## Attachment A

## MOTHERS FOR PEACE REQUEST FOR INFORMATION

DCPP SITE VISIT - MARCH 16, 1993

INITIALS DATE/TIME	DOCUMENT REQUESTED	PROPRIETARY?	COPIES REQUESTED?	DATE/TIME RETURNED
g.3.	LERS 1990-93 related to maintenance and surveillance			
	NCRs 1990-93 related to maintenance and surveillance			
	Updated FSAR sections on maintenance			
N	AD4-ID9	✓		JZ 12
N	STP M-92 r.6			JZ 12:15
N	M-93A r.2			JZ 12:30
N	M-41			12:21 MB
N	M-45A r.4 r.3			MB 12:20
N	M-45B r.2			12:15 MB
N	M-51 r.14 & 2 w <sup>1</sup> u-2			12:11 MB JZ 12:08
N	R-10 r.6			JZ 12:10
N	P-2B			12:10 MB

'93 APR 29 P4:09

# 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  
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Adjudicatory File  
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Diablo Canyon Independent Safety Committee  
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Monterey, CA 93940

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

Administrative Judge  
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*Jill ZamEk*

Jill ZamEk

Dated April 26, 1993, San Luis Obispo County, CA