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May 3, 1993

## BY HAND DELIVERY

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Administrative Judge  
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Frederick J. Shon  
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Jerry R. Kline  
Administrative Judge  
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Washington, DC 20555

Re: Pacific Gas and Electric Co. (Diablo Canyon Nuclear  
Power Plant, Units 1 and 2), Docket Nos. 50-275-  
OLA, 50-323-OLA, (Construction Period Recapture)

Dear Administrative Judges: <sup>1-2</sup>

On April 26, 1993, the San Luis Obispo Mothers for Peace ("MFP") filed several motions in this proceeding. This letter is to inform the Licensing Board of communications between the parties that should moot at least one of the motions.

In its "Motion for Extension of Time to Examine Documents at Diablo Canyon Nuclear Power Plant" ("Motion"), MFP seeks time beyond the April 12, 1993, discovery completion date in this proceeding in order to complete its document discovery at the Diablo Canyon Power Plant ("DCPP"). MFP states that it needs the time to inspect/copy documents previously identified by Pacific Gas & Electric Company ("PG&E") as responsive to MFP's First, Second, and Third Sets of discovery requests. MFP, in its Motion, proposes a site visit on May 4, 5 and/or 6.

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May 3, 1993

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PG&E has agreed to this proposal, as documented in the attached letter to Ms. ZamEk of MFP. As stated therein, PG&E will make available documents previously identified by PG&E as responsive to MFP's First, Second, and Third Sets of requests. Note that with respect to the First set, PG&E continues to believe that MFP has shown no good cause for the additional opportunity for document discovery, given the time available previously to schedule this visit. Nonetheless, PG&E is voluntarily including First set responses within the scope of the visit in order to complete the discovery.

Also, as stated in the letter to Ms. ZamEk, the document production will not include any documents for which discovery objections are pending. Objectionable requests were not included in the scope of MFP's Motion. Assuming MFP arrives for document production as proposed, the Motion should be treated as moot.

PG&E wishes also to highlight a matter addressed by MFP in its filings of April 26, 1993. MFP takes issue at several places in its filings with PG&E's production of documents at DCPD on March 16, 1993. Given the limited time MFP stayed at the site and the scope of the document production involved, PG&E believes its production of documents was reasonable. Moreover, PG&E, in good faith, provided those LERs and NCRs which it believed MFP had requested (as shown by the documents attached to the letter to Ms. ZamEk). PG&E has been willing throughout this proceeding to make specific documents available to MFP, and remains willing to accommodate MFP at the site this week. We do not understand MFP's reluctance to communicate with PG&E before now regarding discovery and its unwillingness to get on with the task.

With respect to MFP's other filings of April 26, 1993, PG&E notes that the normal response date for motions filed on that date would be May 11, 1993 -- the date of the scheduled prehearing conference. Therefore, PG&E proposes to defer its responses to the following MFP filings until the oral presentation at the conference:

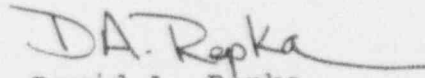
- 1) MFP's "Motion to Compel Pacific Gas and Electric Company to Respond to the Second and Third Sets of Interrogatories and Requests for Production of Documents Filed by San Luis Obispo Mothers for Peace;"
- 2) MFP's "Motion for Leave to Reply to Pacific Gas and Electric Company's Opposition to Additional Discovery Re: Cables" (as well as the Reply included therein).

WINSTON & STRAWN

May 3, 1993  
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MFP's other filings of April 26, 1993 require no response  
from PG&E.

Very truly yours,

  
David A. Repka

Counsel for Pacific Gas &  
Electric Company

Enclosure

cc: Service List

# WINSTON & STRAWN

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April 30, 1993

## BY FEDERAL EXPRESS

Ms. Jill ZamEk  
San Luis Obispo Mothers for Peace  
1123 Flora Road  
Arroyo Grande, CA 93420

Re: Document Production at Diablo Canyon

Dear Ms. ZamEk:

This letter is a follow-up to Chris Warner's telephone call to you yesterday, and responds to the San Luis Obispo Mothers for Peace (MFP) request of April 26, 1993 for further document discovery at Diablo Canyon Power Plant (DCPP).

As you know, PG&E has previously offered MFP, on numerous occasions, the opportunity to review documents at DCPP pursuant to discovery requests. Therefore, as Chris Warner mentioned to you yesterday, we would be happy to accept your request for further document production at DCPP on May 4, 5 and/or 6, as suggested in MFP's Motion for Extension of Time to Examine Documents at DCPP. During this time we would make available any of the documents we have previously identified as subject to production in our responses to MFP's First, Second, and Third sets of discovery requests filed in the license amendment proceeding. To enhance the efficiency of the effort, we also accept MFP's commitment that you provide us, prior to May 4, a list of those documents MFP wishes to copy at DCPP. To the extent possible, we will then have those documents ready when MFP's representatives arrive at the site.

Although we do not believe MFP has demonstrated good cause for extending the April 12 deadline for document review in connection with the First set of requests, PG&E, in good faith, is willing to voluntarily include documents in response to the First set of requests in the document production next week.

Also, during the site visit, PG&E will not waive any objections it has made to specific document requests to date.

Ms. Jill ZamEk  
April 30, 1993  
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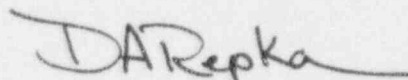
Accordingly, we will not make available documents subject to our previous objections, either in the First, Second or Third sets of requests, or in the request for supplemental discovery regarding cable matters. The focus of the site visit should be to complete document production which is not in dispute.

Two additional points are in order. First, in MFP's papers of April 26, MFP complains that we filed our responses to the Second and Third sets on April 12, stating that documents would be made available at the site only through April 12. Contrary to your reading, it was never our intent to limit this document production to April 12, if the request in the Second or Third set was a new request and PG&E identified specific documents to be made available. With respect to these Second and Third set responses we anticipated follow-up production at the site. In any event, we now welcome MFP's request to visit the site next week to complete document production where not in dispute.

Second, MFP in two of its filings of April 26 takes issue with the fact that during the first site visit PG&E allegedly did not provide all of the LERs and NCRs identified in Attachments 2 and 3 to our response to the First set of discovery requests. However, attached to this letter is the mark-up of the two attachments given to me on the day of the first site visit by Rochelle Becker. The LERs and NCRs checked by Ms. Becker on that mark-up were those we understood to be requested, and those were the LERs and NCRs we indeed provided. Obviously, if there are other LERs and NCRs from Attachments 2 and 3 that MFP still wants, we will be happy to provide them during the site visit next week.

Please contact me or Chris Warner (415) 973-6695 no later than noon (PDT), Monday, May 3, 1993, to make final arrangements for your site visit.

Very truly yours,



David A. Repka

Counsel for Pacific Gas  
& Electric Company

Interrogatory 12*Roberta  
Baker*

## MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC1-90-EM-N001	1-12-90	Dedication of relays ✓
DC2-90-EM-N028	4-19-90	BTC 232/High charging current
DC2-90-EM-N029	4-19-90	Valve 8805B failed to meet stroke open time
DC1-90-EM-N042	6-11-90	SI-1-8805A Failed to cycle on actuation signal
DC2-90-EM-N044	6-11-90	Main generator load rejection
DCO-90-EM-N070	10-17-90	RHR motor 1-2 work not done in accordance with work order
DCO-90-EM-N081	12-4-90	Uninterruptible power supply for Units 1 and 2 AMSAC (ATWS mitigation system and circuitry) failed
DC1-90-MM-N002	1-15-90	Failure sleeves on condenser
DCO-90-MM-N013	3-16-90	Crosby relief valves
DC2-90-MM-N016	3-28-90	Snubbers found locked
DC2-90-MM-N023	4-17-90	Check valve MS-2-5166 was found stuck open
DC2-90-MM-N055	8-28-90	Snubber pin missing
DC2-90-MM-N071	10-25-90	FW-2-LCV-106 and 107 actuators installed
DC2-90-MM-N078	11-16-90	FCV-152 leakoff line supports not per design
DCO-90-MM-N089	12-21-90	Mechanical maintenance M&TE
DCO-91-EM-N009	1-21-91	FCV-495/496 corrosion prevented manual valve operation



# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC1-91-EM-N027	3-6-91	RHR pump motor screws missing from bearing housing cap
DC1-91-EM-N041	2-5-92	ESF actuation - CVI
DC1-91-EM-N046	4-29-91	Unit 1 trip, 4-24-91 manual trip of Unit 1 due to power increase
DC2-91-EM-N077	9-12-91	MOV 9001B motor leads not joined with Raychem splices ✓
DC2-91-EM-N084	10-3-91	Bus 2-G fire in 480v motor control center after start of diesel engine 2-1
DC2-91-EM-N086	10-3-91	Motor operated valve actuator failure
DC2-91-EM-N095	10-25-91	Circuit breaker failed to open on power transfer from auxillary to start-up transformer
DC1-91-MM-N015	2-13-91	ASW pipe support 286-72R unable to perform design function
DC1-91-MM-N018	2-19-91	Pipe support stud found not welded to containment liner
DC1-91-MM-N028	3-8-91	Loss of off-site power to U1 because of grounding incident between 500kv line and crane boom
DCO-91-MM-N034	3-15-91	Rigging from unapproved structures
DCO-91-MM-N037	3-22-91	Weld filler material not controlled in accordance with nuclear weld control manual

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC0-91-MM-N042	4-3-91	Foreign material exclusion area control less than adequate
DC0-91-MM-N049	6-6-91	DEG 1-3 test cock valve broke when tightened
DC0-90-MM-N057	8-31-90	Fire pump 0-2 maint deficiencies
DC0-91-MM-N061	7-12-91	Lubrication storage and handling discrepancies
DC1-91-MM-N066	8-6-91	Component cooling water heat exchanger 1-1 flooding
DC1-91-MM-N067	8-13-91	Auxillary salt water pump vault drain. Check valves
DC2-91-MM-N069	8-14-91	Leaking from charging subsystem of chemical and volume control system
DC2-91-MM-N072	8-27-91	MS-2-RV-225/60 relief valve declared inoperable due to faulty test equipment
DC2-90-TI-N025	4-18-90	Spurious CVI due to a voltage transient
DC2-90-TI-N031	4-24-90	Steam line isolation
DC2-90-T1-N068	10-15-90	Electrical room temperature monitor
DC1-90-T1-N090	12-24-90	Pressurizer sprug valve, 1-PCV-455B, failed open
DC2-91-T1-N003	1-15-91	Wrong channel adjusted
DC2-92-T1-N062	7-16-91	CVI during maintenance
DC1-91-T1-N068	8-13-91	CVI curing maintenance
DC2-91-T1-N088	10-7-91	Inadvertent SI due to personnel error



# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC1-91-T1-N096	10-25-91	Containment wide range level failed low
DC1-92-T1-N039	9-8-92	FHB ventilation swap due to personnel error
DC2-90-OP-N020	4-16-90	Inadvertent ESF ventilation systems mode transfer
DC1-90-OP-N082	12-6-90	Unit 1 trip, 12-5-90, due to turbine runback failed to reduce generator level
DC1-90-OP-N083	12-10-90	ESF actuation due to leaking feedwater. Check valves
DC0-92-QA-N003	1-31-92	Maintenance program commitment had not been met
X DC0-91-MM-N079	9-18-91	Diesel generator 2.2 loose camshaft dampener fastener ✓
DC2-91-MM-N094	10-21-91	STP V-3P3 failure/FW-2-532
X DC0-92-MM-N007	2-12-92	Containment fan coolers - counterweights on backdraft dampers missing or lacking locknuts ✓
DC1-92-MM-N021	5-15-92	1-171SL snubber damage
DC0-92-MM-N022	5-26-92	HVAC maintenance practices - are they sufficient to assure equipment reliability and safety
DC1-92-MM-N033	7-8-92	Centrifugal charging pump D-1-motorhold down bolts found unmarked and machined down to their root diameter
X DC2-92-EM-N026	6-3-92	Valve failed to fully open ✓
DC1-92-T1-N020	4-29-92	CV1 RM-14B Spike
X DC2-91-SS-N013	2-5-91	Fire protection (SSPS halon) - damper failed to close ✓

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
		upon operation of the halon system
DC0-90-SE-N080	11-21-90	Fire in electrical panel ✓
DC1-90-WP-N093	12-28-90	Inadvertent ground causes CV1 in Unit 1
DC1-91-WP-N012	2-1-91	Reactor trip - FW-1-530 & 540 closure resulting in a low steam generator level trip
DC1-91-WP-N021	2-20-91	Quality-related maintenance work performed w/o a work order as required by APC-4053
DC2-91-WP-N097	10-25-91	Missed PMT (post maintenance test not performed following maintenance on a safety injection valve
DC1-92-EM-N054	10-31-92	H0 POT on ASW PP motor 1-2 cable failed
XDC0-90-MM-N057	8-31-90	Fire pump 0-2 maintenance ✓ deficiencies
DC0-90-TN-N064	10-15-90	Numerous pump STPs do not strictly meet requirements of ASME Code section XI
DC0-91-TN-N026	3-5-91	Various check valves not verified stroked closed as part of IST testing program
DC0-92-TN-N055	11-2-92	Vibration data for STP P-613 potentially taken at wrong location on pump
DC0-92-EN-N005	3-20-92	Reactor head vent solenoid valve terminal block material substitute may not meet EQ requirements

# MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC2-90-T1-N031	5-18-90	Steam flow transmitter reinstalled with sensing lines crossed
DC092-MF-N025	5-29-92	Design life/shelf life limitations for non-EQ equipment not adequately implemented
DC0-91-TR-N044	4-4-91	Maintenance Department's implementation of program requirements regarding personnel qualifications
DC0-92-TN-N004	1-28-92	Long term cooling water hoses hydo tested, failed and were not replaced, other LTCW hose were not tested
DC1-92-TC-N041	--	Time limit for surveillance required by Tech Specs including extension exceeded when a technician to perform gas decap tank surveillance
DC0-91-EN-N024	6-14-91	Safety related solenoid valve with unidentified electrical splice
DC1-91-EN-N019	5-6-91	Dielectric material in a connector different than specified in the environmental qualification report
DC2-91-TN-N023	2-21-91	Undersized welds installed in plant during work for the CVCS letdown line repair
DC1-92-TP-N052	10-12-92	Failed to recognize ASW pump was in alert range. Therefore, tests were not performed on an accelerated frequency

# MAINTENANCE AND SURVEILLANCE NCRS

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
DC2-91-SS-N101	11-26-91	One damper failed during the cable spreading room cardox surveillance test
DC2-91-TN-N102	12-5-91	Work controls not effective in controlling accumulation of unsecured loose material in containment
DC0-90-SS-N063	9-21-90	Spurious discharge of cardox system during diesel generator cardox system testing
DC0-91-TN-N048	5-28-91	Certain check valves are not verified for full stroking open, as per IST Program
DC0-91-TN-N065	7-31-91	NRC violation for not having appropriate acceptance criteria for diesel generator starting air compressor
DC1-90-WP-N003	1-17-90	Boric acid heat tracing functional test not performed on schedule
DC1-91-EN-N016	6-11-91	Newly installed RHR valve failed to close during surveillance test
DC1-91-OP-N059	7-5-91	During STP M-16E operator error caused an inadvertent actuation of ESF
DC1-91-OP-N038	3-25-91	During performance of surveillance test an inadvertent ESF occurred
DC1-91-TN-N007	1-18-91	Fuel handling building ventilation system failed tech spec requirement
DC1-92-TN-N003	1-23-92	Boric acid transfer pump was not performed on an

MAINTENANCE AND SURVEILLANCE NCRs

<u>NCR NUMBER</u>	<u>INITIATE DATE</u>	<u>SUBJECT</u>
		accelerated frequency as required
DC2-92-OP-N032	7-2-92	Missed step in STP I-1B performance
DC1-92-EN-N031	11-19-92	Recovery time determined during STP did not meet DCPD commitments for the diesel generator
DC1-91-TN-N002	1-3-91	Back leakage through main feedwater check valve may impact AFW system flow operability

P1/NCRs2.dis

*Rockwell  
Butler*1990-1993 IERS RELATED TO MAINTENANCE/SURVEILLANCE

✓ ~~2-90-004-00~~ Containment Ventilation Isolation and FHB Ventilation System Shift to Iodine Removal Mode Due to Personnel Error During Troubleshooting

✓ ~~2-90-005-01~~ Closure of the Main Steamline Bypass Valves Due to Inadequate Backfilling of Transmitter Sensing Lines

✓ ~~2-90-006-01~~ Violation of Technical Specification Because of Inoperable Steam Flow Transmitters Due to Personnel Error

✓ ~~1-90-007-00~~ Missed Surveillance of Sealed Sources Due to Personnel Error

✓ ~~2-90-009-01~~ Inoperable Room Temperature Monitor Due to Personnel Error

✓ ~~1-90-014-00~~ Reactor Trip on Turbine Trip Due to Inadequate Evaluation of Runback Limit Setpoint

✓ ~~1-90-015-00~~ ESF Actuation, P-14 (High-High Steam Generator Water Level) Due to Feedwater Regulating and Bypass Valves Leakage  
*There is a rev. 1 of this*

✓ ~~1-90-017-00~~ Reactor Trip Resulting from Failed Pressurizer Spray Valve Due to Incorrect Screw Installation  
*There is a rev. 1 of this*

✓ ~~1-90-018-00~~ Fire Damper Cardox Actuation Fusible Link Assembly Incorrectly Installed for Indeterminate Reason

✓ ~~2-91-001-00~~ Containment Ventilation Isolation Resulting From a Voltage Transient Due to Personnel Error

✓ ~~1-91-002-00~~ Reactor Trip on Steam Generator Low Level with Steam Flow/Feedwater Mismatch due to Personnel Error

✓ ~~2-91-002-00~~ Potential Missetting of Main Steam Line Code Safety Valve due to Failure of Test Equipment

✓ ~~1-91-004-00~~ Loss of Offsite Power During Refueling Caused by Crane Due to Personnel Error

✓ ~~2-91-007-00~~ Inadvertent Safety Injection While in Mode 5 Due to Personnel Error

✓ ~~1-91-008-00~~ Manual Reactor Trip Caused by Rod Control Power Supply Fuse Failure Due to Personnel Error

✓ ~~1-91-009-00~~ Reactor Trip Due to Personnel Error on Safety Injection Due to Leaking Steam Dump Valve



2-91-009-01 10 CFR 100 Dose Limits Potentially Exceeded  
in Event of Design Basis Loss of Coolant Accident Recovery as a  
Result of Valve Leakage

2-91-011-00 Failure to Test Valve Following Maintenance  
Due to Personnel Error

1-91-012-00 Emergency Diesel Fuel Oil Inventory  
Surveillance Missed Due to Personnel Error

2-91-012-00 Debris in Containment, Lack of Visual  
Inspections

1-91-013-00 Containment Ventilation Isolation During  
Maintenance due to Personnel Error

~~1-91-019-00 CFCUs Maintenance~~

1-92-005-01 Containment Ventilation Isolation Due to  
Spurious High Radiation Signal

~~1-92-006-00 Diesel Fuel Oil Transfer System Corrosion~~

~~1-92-010-00 MOV Fails Stroke Test~~

~~1-92-013-00 FHB I&C Test Error~~

~~1-92-017-00 Missed Chemistry Surveillance~~

1-92-024-00 Missed Accelerated Surveillance

1-93-002-00 Containment Isolation Valve Not Isolated in  
Accordance with Technical Specifications