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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

83 JUN -6 P1:35

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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In the Matter of )  
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PACIFIC GAS AND ELECTRIC COMPANY )

Docket Nos. 50-275 O.L.  
50-323 O.L.

(Diablo Canyon Nuclear Power )  
Plant, Units 1 and 2) )  
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\_\_\_\_\_ )

JOINT INTERVENORS' RESPONSE TO  
MOTION OF GOVERNOR DEUKMEJIAN TO  
REOPEN THE RECORD ON CONSTRUCTION  
QUALITY ASSURANCE

On May 18, 1983, Governor Deukmejian moved this Appeal Board for an order reopening the record in the Diablo Canyon Nuclear Power Plant ("Diablo Canyon") licensing proceeding on the issue of construction quality assurance ("CQA/QC"). The Governor based his motion on the disclosure of thousands of deficiencies in the Diablo Canyon facility, as documented in various affidavits, sworn statements, and other recent documents.

The Joint Intervenors support the Governor's motion. It supplies additional evidence regarding the breakdown in CQA/QC at Diablo Canyon on which the Joint Intervenors based their May 10, 1983 Motion to Reopen the Record on the Issue of Construction Quality Assurance. In particular, the Governor relies upon a May 6, 1983 Declaration of Richard B. Hubbard on Breakdowns in Construction Quality Assurance at Diablo Canyon,

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which analyzes (a) the CQA/QC deficiencies outlined by former quality control personnel for Diablo Canyon contractor H.P. Foley Company, (b) the CQA/QC deficiencies identified as part of the Independent Design Verification Program ("IDVP") based on the limited review conducted by Teledyne Engineering Services ("TES") and Stone and Webster Engineering Company ("SWEC"), and (c) the limitations in the TES/SWEC review itself. This most recent declaration confirms the evidence and conclusions outlined in affidavits submitted previously by the Joint Intervenors in support of their motions to reopen the record on quality assurance. Because of its obvious relevance to their pending motion, the Joint Intervenors hereby incorporate by reference the May 6, 1983 Declaration of Richard B. Hubbard as further support for reopening the record.

In addition, on May 10 and 11, 1983, the NRC issued two Preliminary Notices of Violation, both of which constitute additional direct evidence of CQA/QC deficiencies at Diablo Canyon not detected by the IDVP. The first -- PNO 5-83-21 -- describes the discovery of faulty welds in the component cooling water system. The second -- PNO 5-83-22 -- describes the discovery on May 9, 1983 that certain piping in the primary reactor coolant system fails to meet NRC standards for minimum wall thickness. Both discoveries are currently being investigated by PGandE and the NRC. These notices, which will be submitted to the Board when copies have been obtained

by counsel, are also incorporated by reference as further support for the Joint Intervenors' May 10th motion.


For the reasons stated by the Governor and by the Joint Intervenors in their respective motions, we urge this Board to reopen the record to take further evidence on the issue of CQA/QC.

DATED: May 31, 1983

Respectfully submitted,

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I hereby certify that on this 31st day of May, 1983, I have served copies of the foregoing JOINT INTERVENORS' RESPONSE TO MOTION OF GOVERNOR DEUKMEJIAN TO REOPEN THE RECORD ON CONSTRUCTION QUALITY ASSURANCE, mailing them through the U.S. mails, first class, postage prepaid.

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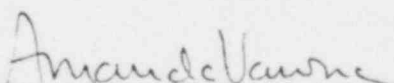
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