

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)
)
)

PACIFIC GAS AND ELECTRIC COMPANY)

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

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

SECOND SET OF INTERROGATORIES PROPOUNDED
TO PACIFIC GAS AND ELECTRIC COMPANY
BY GOVERNOR DEUKMEJIAN

Governor George Deukmejian hereby propounds to
applicant Pacific Gas and Electric Company (PG&E) this Second
Set of Interrogatories, to be answered under oath within
fourteen days, pursuant to 10 C.F.R. section 2.740b.

INSTRUCTIONS

A. Where you have incomplete information that
precludes your fully answering an interrogatory, give such
information as you have and state what information you do not
have. If you are unable to give the information in the form
sought but have the information aggregated differently, give
the information in the form in which you have it and explain.

B. When asked in the interrogatories below to
identify or to give the identity of a person, please give the
following information about him or her:

1. full name;
2. present job title and employer;

C. When asked in the interrogatories below to identify or to give the identity of a document, please give the following information about the document:

1. its title, if any;
2. its nature (e.g., letter, memorandum, chart, computer printout, ledger);
3. the date, if any, stated on the document;
4. the identity of each person who signed it;
5. the identity of each person to whom it is addressed.

D. As used herein, the singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun so used, and vice versa; similarly, the use of the masculine form of a pronoun shall be considered to include also within its meaning the feminine form of the pronoun so used, and vice versa; and in a similar fashion any tense of any verb used herein shall be considered also to include within its meaning all other tenses of the verb so used.

E. The use of the word "or" is the inclusive form of that conjunction, implicitly including within its meaning the word "and."

F. Should you have any questions regarding the meaning of any term or interpretation of any interrogatory, you are encouraged to consult with counsel regarding such questions.

DEFINITIONS

- (1) "ANSI" means American National Standards Institute.
- (2) "Appendix A" means Appendix A to part 50 of 10 C.F.R.
- (3) "Appendix B" means Appendix B to part 50 of 10 C.F.R.
- (4) "Bechtel" means the Bechtel Power Corporation.
- (5) "Diablo Canyon" means units 1 and 2 of the Diablo Canyon Nuclear Power Plant, including all structures, systems, and components at the site.
- (6) "Diablo Canyon Project" (DCP) means PG&E, Bechtel, all joint projects of PG&E and Bechtel concerning Diablo Canyon, and all contractors, subcontractors, consultants, and agents of the foregoing, excluding the IDVP.
- (7) "Document" means any and all things that constitute "writings" pursuant to rule 1001 of the Federal Rules of Evidence.
- (8) "Important to safety" means SS&Cs that provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public.
- (9) "Independent Design Verification Program" (IDVP) means the program established by the November 19, 1981, order of the Nuclear Regulatory Commission (NRC), the November 19, 1981, letter from Harold Denton to Malcolm Furbush, and implementing directives of the NRC staff, as that program may have been modified since that date.
- (10) "Person" includes natural persons, corporations, partnerships, other business entities, and public agencies.
- (11) "PG&E" means the Pacific Gas and Electric Company and

its agents, employees, contractors, subcontractors, affiliates, departments, divisions, units, subunits, and attorneys, excluding the IDVP.

(12) "Procured components" are components that were purchased by PG&E, rather than designed by employees of PG&E or PG&E design contractors.

(13) "Quality assurance" means all those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service. Quality assurance includes quality control.

(14) "Quality control" means those quality assurance actions related to the physical characteristics of a material, structure, component, or system, which provide a means to control the quality of the material, structure, component, or system to predetermined requirements.

(15) "Reg. Guide" means a Regulatory Guide of the Nuclear Regulatory Commission.

(16) "Safety-related" means those SS&Cs necessary to assure: (1) the integrity of the reactor coolant pressure boundary; (2) the capability to shut down the reactor and maintain it in a safe shutdown condition; or (3) the capability to prevent or mitigate the consequences of accidents which could result in potential off-site exposures comparable to the guideline exposures of 10 C.F.R. part 100.

(17) "SS&C" means structures, systems, and components.

(18) "WASH-1283" means the document issued by the Atomic Energy Commission on or about May 24, 1974, entitled "Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants -- Revision 1."

(19) "You" and "your" refer to PG&E.

INTERROGATORIES

1. When did PG&E first commit itself to comply with Appendix B in the design of Diablo Canyon?

2. In what form was the commitment to comply with Appendix B made?

3. To what extent did the commitment apply to work performed before the date of the commitment?

4. If the commitment identified in your answer to Interrogatory No. 1 was other than an unconditional commitment to comply fully with all terms of Appendix B for design of Diablo Canyon,

(a) What was the extent of the commitment made at that time?

(b) Was that commitment ever enlarged by PG&E?

(c) If it was ever enlarged, identify each and every commitment by PG&E to enlarged compliance, specifying

(i) when the commitment was made,

(ii) what the extent of the enlarged commitment was, and

(iii) the form in which the commitment was made.

5. When did PG&E first commit itself to comply with the quality assurance requirements of Appendix A in the design of Diablo Canyon?

6. In what form was the commitment to comply with the quality assurance requirements of Appendix A made?

7. To what extent did the commitment apply to work performed before the date of the commitment?

8. If the commitment identified in your answer to Interrogatory No. 5 was other than an unconditional commitment to comply fully with all terms of the quality assurance requirements of Appendix A for design of Diablo Canyon,

(a) What was the extent of the commitment made at that time?

(b) Was that commitment ever enlarged by PG&E?

(c) If it was ever enlarged, identify each and every commitment by PG&E to enlarged compliance, specifying

(i) when the commitment was made,

(ii) what the extent of the enlarged commitment was, and

(iii) the form in which the commitment was made.

9. When did PG&E first commit itself to comply with the quality assurance requirements of Appendix A in the design of Diablo Canyon SS&Cs that are important to safety but not safety-related?

10. In what form was the commitment made to comply with the quality assurance requirements of Appendix A in the design of Diablo Canyon SS&Cs that are important to safety but not safety-related?

11. To what extent did the commitment apply to work performed before the date of the commitment?

12. If the commitment identified in your answer to Interrogatory No. 9 was other than an unconditional commitment to comply fully with all terms of the quality assurance requirements of Appendix A for design of Diablo Canyon SS&Cs that are important to safety but not safety-related,

(a) What was the extent of the commitment made at that time?

(b) Was that commitment ever enlarged by PG&E?

(c) If it was ever enlarged, identify each and every commitment by PG&E to enlarged compliance, specifying

(i) when the commitment was made,

(ii) what the extent of the enlarged commitment was, and

(iii) the form in which the commitment was made.

13. When did PG&E first commit itself to comply with WASH-1283 in the design of Diablo Canyon?

14. In what form was the commitment to comply with WASH-1283 made?

15. To what extent did the commitment apply to work performed before the date of the commitment?

16. If the commitment identified in your answer to Interrogatory No. 13 was other than an unconditional commitment to comply fully with all terms of WASH-1283 for design of Diablo Canyon,

(a) What was the extent of the commitment made at that time?

(b) To what extent did the commitment apply to work performed before the date of the commitment?

(c) Was that commitment ever enlarged by PG&E?

(d) If it was ever enlarged, identify each and every commitment by PG&E to enlarged compliance, specifying

(i) when the commitment was made,

(ii) what the extent of the enlarged commitment was, and

(iii) the form in which the commitment was made.

17. With respect to each of the ANSI standards specified below in items A through G, state separately:

(a) When did PG&E first commit itself to comply with the standard in the design of Diablo Canyon?

(b) In what form was the commitment to comply with the standard made?

(c) With which revision of the standard did PG&E commit itself to comply, and to what extent did PG&E subsequently commit itself to comply with later revisions?

(d) To what extent did the commitment apply to work performed before the date of the commitment?

(e) If the commitment identified in your answer to item (b), above, was other than an unconditional commitment to comply fully with all terms of the standard for the design of Diablo Canyon:

(1) What was the extent of the commitment made at that time?

(2) Was that commitment ever enlarged by PG&E ?

(3) If it was ever enlarged, identify each and every commitment by PG&E to enlarged compliance, specifying

- (i) when the commitment was made,
- (ii) what the extent of the enlarged commitment was, and
- (iii) the form in which the commitment was made.

The standards to which this interrogatory refers are:

- (A) ANSI N45.2
- (B) ANSI N45.2.9
- (C) ANSI N45.2.10
- (D) ANSI N45.2.11
- (E) ANSI N45.2.12
- (F) ANSI N45.2.13
- (G) ANSI N45.2.23.

18. With respect to each of the Reg. Guides specified below in items A through G, state separately:

(a) When did PG&E first commit itself to comply with the Reg. Guide in the design of Diablo Canyon?

(b) In what form was the commitment to comply with the Reg. Guide made?

(c) With which revision of the Reg. Guide did PG&E commit itself to comply, and to what extent did PG&E subsequently commit itself to comply with later revisions?

(d) To what extent did the commitment apply to work performed before the date of the commitment?

(e) If the commitment identified in your answer to item (b), above, was other than an unconditional commitment to comply fully with all terms of the Reg. Guide for the design of Diablo Canyon:

(1) What was the extent of the commitment made at that time?

(2) Was that commitment ever enlarged by PG&E ?

(3) If it was ever enlarged, identify each and every commitment by PG&E to enlarged compliance, specifying

(i) when the commitment was made,

(ii) what the extent of the enlarged commitment was, and

(iii) the form in which the commitment was made.

The Reg. Guides to which this interrogatory refers are:

(A) 1.28

(B) 1.88

(C) 1.74

(D) 1.64

(E) 1.144

(F) 1.123

(G) 1.146

19. For each and every criterion contained in Appendix B, during what period, if any, do you contend that the quality assurance program for the design of Diablo Canyon Units 1 and 2 met the requirements of that criterion?

20. Has the seismic design work of each and every design group in the design chain for each and every safety-related SS&C been reviewed by the DCP since November 19, 1981?

21. If your answer to the preceding interrogatory is other than an unqualified "yes," for all safety-related SS&Cs that have not been so reviewed state:

- (a) the identity and locations of the SS&Cs, and the identity of the design groups whose work was not reviewed;
- (b) the reason for their exclusion from review;
- (c) the identity of the person responsible for the decision to exclude them.

22. Has the seismic qualification of all procured components that are safety-related been reviewed by the DCP since November 19, 1981?

23. If your answer to the preceding interrogatory is other than an unqualified "yes," for all such components that have not been so reviewed state:

- (a) their identity and locations;
- (b) the vendor or vendors;
- (c) the reason for their exclusion from review;
- (d) the identity of the person responsible for the decision to exclude them.

24. Has the seismic design work of each and every design group in the design chain for each and every safety-related SS&C that was reviewed by the DCP been reviewed for the DE, DDE, and Hosgri earthquake since November 19, 1981?

25. If your answer to the preceding interrogatory is other than an unqualified "yes," for each safety-related SS&C that was not reviewed for all three earthquakes state:

(a) the identity and locations of the SS&Cs, and the identity of the design groups whose work was not reviewed;

(b) for which of the three earthquakes it was not reviewed;

(c) the reason for its exclusion from review for that earthquake;

(d) the identity of the person responsible for the decision to exclude it.

26. Has the seismic qualification of all safety-related procured components that were reviewed by the DCP been reviewed for the DE, DDE, and Hosgri earthquake?

27. If your answer to the preceding interrogatory is other than an unqualified "yes," for all such components that have not been so reviewed state:

(a) their identity and locations;

(b) the vendor or vendors;

(c) for which of the three earthquakes they were not reviewed;

(d) the reason for their exclusion from review for that earthquake;

(e) the identity of the person responsible for the decision to exclude them.

28. Has the nonseismic design work of each and every design group in the design chain for each and every

safety-related SS&C been reviewed by the DCP since November 19, 1981?

29. If your answer to the preceding interrogatory is other than an unqualified "yes," for all safety-related SS&Cs that have not been so reviewed state:

(a) the identity and locations of the SS&Cs, and the identity of the design groups whose work was not reviewed;

(b) the reason for their exclusion from review;

(c) the identity of the person responsible for the decision to exclude them.

30. How did Westinghouse define "safety-related" for purposes of compliance with Appendix E to Part 50 of 10 C.F.R. for all SS&Cs supplied by Westinghouse and used at Diablo Canyon.

31. How did Westinghouse define "important to safety" for purposes of compliance with General Design Criterion 1 of Appendix A to Part 50 of 10 C.F.R. for all SS&Cs supplied by Westinghouse and used at Diablo Canyon.

32. If your answer to any of the preceding interrogatories applies differently to unit 1 and unit 2 of Diablo Canyon, identify the interrogatory and explain how the answer differs for unit 1 and unit 2.

33. Identify each and every person on whom you relied for the rendition of expert advice on matters pertaining to statistics and probability theory and give the qualifications of each.

34. Identify the person or persons referred to at page 3.5-8 of the IDVP Final Report as having been retained by the DCP to conduct a statistical evaluation, and provide the qualifications of each.

35. With respect to the statistical evaluation described in the preceding interrogatory, state:

- (a) The scope of the evaluation.
- (b) The schedule for the conduct of the evaluation.
- (c) The results of the evaluation to date.
- (d) The nature of all work remaining to be done in connection with the evaluation.
- (e) The identity of each and every person, excluding clerical personnel, who participated in the evaluation and the nature of the work each performed.

36. For each of the preceding interrogatories, state separately for each interrogatory:

- (a) the identity of each and every person who participated in its answer;

(b) the identity of each and every document relied upon in preparing the answer.

DATED: July 8, 1983

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CERTIFICATE OF SERVICE

I hereby certify that on this date I caused copies of the foregoing "Second Set of Interrogatories Propounded to Pacific Gas and Electric Company by Governor Deukmejian" and "Second Set of Interrogatories Propounded to the Independent Design Verification Program Contractors by Governor Deukmejian" served on the following by U.S. Mail, first class, postage prepaid.

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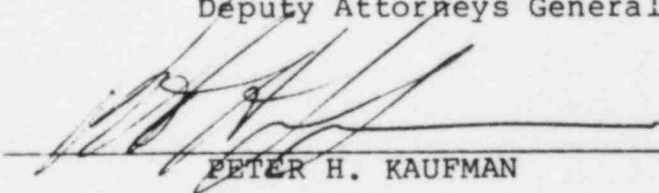
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DATED: July 8, 1983

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