

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION⁸³
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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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.

(Reopened Hearing --
Design Quality
Assurance)

JOINT INTERVENORS' SECOND SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS TO PACIFIC GAS AND ELECTRIC COMPANY

I. Interrogatories

Please use the same instructions as those given in the First Set of Interrogatories Propounded to Pacific Gas and Electric Company by Governor Deukmejian and Joint Intervenors.

1. List all non-Class I structures, systems, and components at Diablo Canyon Nuclear Power Plant ("Diablo Canyon") that are "important to safety," as that term is prescribed and defined in the November 20, 1981 memo from Harold Denton entitled "Standard Definitions for Commonly-Used Safety Classification Items."

2. List each and every major contractor and subcontractor for Diablo Canyon, Units 1 and 2, that has been involved in the design of structures and/or systems and/or components important to safety. For PGandE and each such contractor or subcontractor state:

- (a) the time period when the subcontractor did design of such structures, systems, and/or components; and
- (b) the time period when the subcontractor did not develop and/or implement a QA/QC program that complied fully with 10 C.F.R. Part 50, Appendix B, and Appendix A, GDC-1.

3. For PGandE and each of its past or present major Diablo Canyon contractors and subcontractors, state whether you contend that, at all times during their work at Diablo Canyon, each had established and implemented a design QA/QC program that complied fully with 10 C.F.R. Part 50, Appendix B, and Appendix A, GDC-1. If you do not so contend, for each company, contractor, or subcontractor, state:

- (a) each and every fact which supports your answer, including a description of the noncompliance;
- (b) each 10 C.F.R. Part 50, Appendix A or B criterion not complied with;
- (c) the time period in which such noncompliance occurred; and
- (d) as to each instance of noncompliance, all measures, if any, taken by you or others to compensate for the noncompliance.

4. List each ITR, with revision number, upon which you intend to rely in the reopened design quality assurance proceeding. As to each ITR, identify specifically the sections upon which you intend to rely.

5. State whether you intend to rely upon the IDVP Final Report in the reopened design quality assurance proceeding. If so, identify specifically the sections upon which you intend to rely.

6. State whether you intend to rely upon the NRC Staff Diablo Canyon SER Supplement 18, in the reopened design quality assurance proceeding. If so, identify specifically the sections upon which you intend to rely.

7. State whether you have reviewed the Quality Assurance Review and Audit Reports issued by R.F. Reedy, Inc. in March 1982 regarding design activities of PGandE and various of its contractors or subcontractors. If so, state specifically:

(a) each fact stated therein with which you disagree;

(b) the specific pages of each such report where the facts set forth in your answer to subparagraph (a) are located;

(c) each conclusion or opinion stated therein with which you disagree;

(d) the specific pages of each such report where the conclusions or opinions set forth in your answer to subparagraph (c) are located; and

(e) the specific basis for your disagreement with each such fact, conclusion, or opinion.

8. List each and every respect in which the DCP Corrective Action Program is not now complete with respect to any corrective action which is necessitated by, arises out of,

or relates to a defect, nonconformance, or deficiency in (a) the design of Diablo Canyon or (b) the design QA program of PGandE or any the design QA programs of its past or present contractors or subcontractors. In addition, identify specifically (a) each and every structure, system, or component important to safety as to which such corrective action is not complete, (b) the specific corrective action, including any modifications, not completed, and (c) the defect, nonconformance, or deficiency necessitating or leading to such corrective action.

9. List each and every document within your possession, custody, and/or control that describes, documents, outlines, or discusses any deficiency, nonconformance, error, or deviation by PGandE, or any of its Diablo Canyon contractors or subcontractors, in or from compliance with any of the Appendix B criteria, GDC-1 of Appendix A, or applicable QA procedures.

With respect to each such document, state:

- (1) its date and title;
- (2) its author(s) and recipient(s);
- (3) the nature of the deficiency, nonconformance, error, or deviation described; and
- (4) what action, if any, was taken to remedy the deficiency, nonconformance, error, or deviation.

II. Request for Production of Documents

Please use the same instructions as those given in the First Document Production Request Propounded by Governor Deukmejian, except that the date for production shall be on or before September 15, 1983, unless another time is agreed upon.

Each document is relevant to the issue of design quality assurance at Diablo Canyon. The term "documents" as used herein is consistent with the definitions set forth in the above-cited document production request, previously filed herein.

1. Produce all documents identified in response to Interrogatory Nos. 1-9, supra.

2. Produce "Quality Assurance Case Study Working Paper, Case C," prepared as part of, or in response to, the pilot program instituted pursuant to § 13 of the NRC Authorization Act, P.L. 97-415.

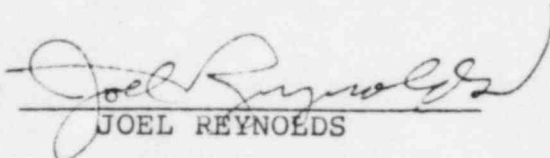
DATED: August 16, 1983

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of August, 1983, I have served copies of the foregoing JOINT INTERVENORS' SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO PACIFIC GAS AND ELECTRIC COMPANY, mailing them through the U.S. mails, first class, postage prepaid.

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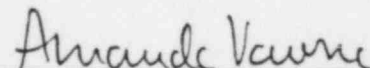
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