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USNRC

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION '83 AUG 22 A11:22

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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| In the Matter of |) | |
| |) | |
| PACIFIC GAS AND ELECTRIC COMPANY |) | Docket Nos. 50-275 O.L. |
| |) | 50-323 O.L. |
| (Diablo Canyon Nuclear Power |) | |
| Plant, Units 1 and 2) |) | (Reopened Hearing -- |
| |) | Design Quality |
| |) | Assurance) |

JOINT INTERVENORS' SUPPLEMENTAL RESPONSE
TO PACIFIC GAS AND ELECTRIC COMPANY'S
FIRST SET OF INTERROGATORIES

Pursuant to the August 9, 1983 Order of this Appeal Board, the Joint Intervenors hereby submit their supplemental response to Pacific Gas and Electric Company's ("PGandE") First Set of interrogatories.

Response to Interrogatory No. 1:

Since September 1981, the Joint Intervenors and their counsel have had numerous conversations with DCP, PGandE, and Bechtel employees regarding defects in the design or design quality assurance programs of the facility. Virtually without exception, those conversations have occurred at NRC or IDVP meetings, on site tours, during formal negotiations regarding the IDVP (February or March 1982, Bethesda), or during the course of hearings, either in San Luis Obispo, California or in Bethesda, Maryland. With the exception of the formal

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negotiations referred to, these conversations have been of an informal nature, generally of brief duration, and have pertained to the general question of design. On some occasions, the conversations were initiated by the PGandE, Bechtel, or DCP employees; on other occasions, they were initiated by the Joint Intervenors. It is impossible at this time to reconstruct the precise dates or times that these conversations occurred, the participants, or the specific substance of the conversations. On two occasions, Mrs. Sandra Silver telephoned DCP employee Richard Koppe, in approximately May of this year. The brief conversations occurred on the same date, and the substance of the information exchanged was limited to the fact that he was aware of the allegations regarding Diablo Canyon design made by an anonymous DCP employee, that he had not seen a copy of the allegations themselves, and that, because the local residents were concerned about the safety of the design, a copy of the allegations and of a transcript of the May 4, 1983 NRC meeting at PGandE to discuss the allegations could be sent to him. A copy of the allegations and the meeting transcript were then sent to him by mail. We are unaware of any other such communications between any of the Joint Intervenors and a PGandE, Bechtel, or DCP employee having occurred since September 1981.

Response to Interrogatory Nos. 5-7:

The information called for by this interrogatory is not available to the Joint Intervenors at this time. However, as stated previously, PGandE's own FSAR indicates the existence of

such SS&C's. In addition, the Joint Intervenors have filed a discovery request to obtain the information, all of which is within PGandE's possession and knowledge. As soon as the Joint Intervenors have obtained the specific information requested through discovery or other means, it will be provided to PGandE.

Response to Interrogatory No. 13:

Mr. Hubbard has already provided his definitions of the listed terms as part of Governor Deukmejian's response to a similar interrogatory. See Response of Governor Deukmejian to First Set of Interrogatories Propounded by Applicant Pacific Gas and Electric Company, at 18-22. The Joint Intervenors incorporate by reference herein the answers already provided by Governor Deukmejian.

Response to Interrogatory No. 14:

The Joint Intervenors have not yet determined what portions, if any, of the numerous ITR's they will rely on in the reopened proceeding. As our review of the ITR's continues and a decision is made to rely upon some of them, we will seasonably supplement our response, consistent with the Board's order.

Response to Interrogatory No. 15:

The Joint Intervenors have not yet determined what portions, if any, of the PGandE Phase I Final Report they will rely on in the reopened proceeding. As our review continues and a decision is made to rely upon some portions, we will

seasonably supplement our response, consistent with the Board's order.

Response to Interrogatory No. 18:

The information requested has already been provided in the Response of Governor Deukmejian to First Set of Interrogatories Propounded by Applicant Pacific Gas and Electric Company, at 26, as follows:

(a) The industry QA/QC standards reviewed by Mr. Hubbard included MIL-Q 98-58, General Electric Company's practices and procedures, the QA/QC requirements in bid requests to General Electric Company's Nuclear Energy Control and Instrumentation Department, relevant ANSI standards, numerous professional journals, and applicable NRC regulations.

(b) The regulatory requirements reviewed by Mr. Hubbard include the draft and final criteria of Appendix B, including all public comments regarding the draft Appendix submitted to the AEC, the draft and final criteria of Appendix A, and CDC-100 Appendix A including all public comments regarding the draft Appendix submitted to the AEC.

(c) All specific documents reviewed by Mr. Hubbard called for by this subpart are referred to in Mr. Hubbard's May 24, 1982 affidavit. Such review was supplemented by Mr. Hubbard's general familiarity with the subject matter.

Response to Interrogatory No. 23:

The documents that the Joint Intervenors intend to rely upon in support of their contentions have already been cited in their original answer. Should the Joint Intervenors subsequently decide to rely upon any additional documents, they will seasonably supplement their response, consistent with the Board's order.

DATED: August 19, 1983

Respectfully submitted,

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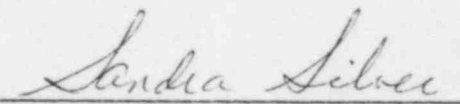
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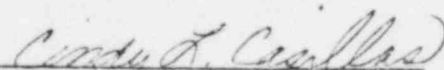
Verification

I have assisted in preparing the Joint Intervenors' supplemental responses to Pacific Gas and Electric Company's First Set of Interrogatories, filed in the reopened proceeding regarding design quality assurance. Said responses are true and correct to the best of my knowledge.


Sandra Silver

San Luis Obispo Mothers
for Peace

Subscribed and sworn to
before me this 18th day
of August, 1983.


Notary Public



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NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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| |) | |
| |) | |

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of August, 1983, I have served copies of the foregoing JOINT INTERVENORS' SUPPLEMENTAL RESPONSE TO PGandE'S FIRST SET OF INTERROGATORIES, mailing them through the U.S. mails, first class, postage prepaid.

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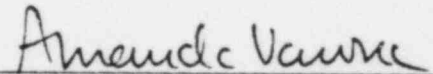
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