

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



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'  
CONTENTIONS REGARDING  
DESIGN QUALITY ASSURANCE

Pursuant to the July 6, 1983 Order of this Appeal Board, the Joint Intervenors hereby submit their proposed contentions regarding design quality assurance at Diablo Canyon Nuclear Power Plant ("Diablo Canyon").

Pacific Gas and Electric Company ("PGandE") and its major subcontractors have failed to develop and implement in a timely fashion a Quality Assurance/Quality Control ("QA/QC") program for the design and redesign of structures, systems, and components ("SS&Cs") important to safety at Diablo Canyon, which QA/QC program:

- (a) meets the requirements of General Design Criterion ("GDC") 1 of Appendix A to 10 C.F.R. Part 50;
- (b) meets the following 10 C.F.R. Part 50 Appendix B criteria:

(1) Criterion 1, regarding responsibility for establishing and executing a QA program as prescribed by the Appendix B criteria;

(2) Criterion 2, regarding establishing such program at the earliest practicable time, including ensuring adequate indoctrination and training of personnel, control over activities affecting quality, and effective management review and control;

(3) Criterion 3, regarding adequate design control and design change control procedures;

(4) Criterion 4, regarding procurement document control;

(5) Criterion 5, regarding documentation of instructions, procedures, or drawings, including quantitative or qualitative acceptance criteria;

(6) Criterion 6, regarding control of documents, including all changes thereto;

(7) Criterion 7, regarding establishing measures to assure that purchased material, equipment, and services conform to the procurement documents;

(8) Criterion 10, regarding establishing, executing, and controlling inspection activities;

(9) Criterion 11, regarding test control;

(10) Criterion 16, regarding establishing measures to assure that conditions adverse to quality and nonconformances are promptly identified and corrected;

(11) Criterion 17, regarding maintaining records sufficient to furnish evidence of activities affecting quality;

(12) Criterion 18, regarding implementing and documenting a comprehensive system of planned and periodic audits and follow-up to verify quality assurance compliance and determine the effectiveness of the program; and

(c) assures that PGandE has met the license commitments set forth in its Final Safety Analysis Report ("FSAR") for Diablo Canyon as required by 10 C.F.R. Part 50.57(a) and 10 C.F.R. 50.34(b).

Further, neither the Independent Design Verification Program ("IDVP") audit of seismic and nonseismic QA/QC at Diablo Canyon nor PGandE's Internal Technical Program ("ITP") has provided reasonable assurance of compliance with all applicable regulatory standards. For example, the IDVP is inadequate because the scope of its review is inadequate; it failed to address non safety-grade SS&Cs important to safety; it utilized sampling rather than 100% reverification of nonseismic SS&Cs; it failed adequately to describe the statistical basis, if any, for the criteria to be used in the selection of a suitable number and type of samples under the program or for the selection of items for additional verification; it failed to verify independently the accuracy or propriety of PGandE's recalculation of the seismic design of the facility, including the technical assumptions underlying such recalculation; it failed to assure that an adequate QA/QC program for the

corrective action program has been established and is being implemented, despite the pressures of schedule and increases in manpower; it failed to assure that the findings and recommendations of Brookhaven National Laboratory ("BNL") have been fully incorporated into the Diablo Canyon design; it failed to verify that the redesign has actually been incorporated into the "as-built" facility; and it failed to identify and eliminate the "root cause" of the seismic and nonseismic design errors discovered at the plant. In addition, the Interim Technical Reports issued by the IDVP fail to document adequately the basis for the IDVP findings, recommendations, and/or conclusions set forth in such reports.

Finally, PGandE failed to systematically review and verify the validity of all results of tests previously conducted with respect to any Diablo Canyon SS&C which have been affected by the redesign conducted since September 1981. PGandE failed to identify and perform (in accordance with written test procedures as prescribed by Criterion 11 of 10 C.F.R. Part 50) the additional testing required to demonstrate that as redesigned and modified all Diablo Canyon SS&Cs will perform satisfactorily in service.

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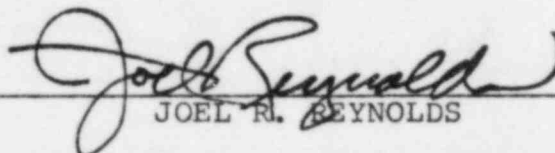
DATED: July 19, 1983.

Respectfully submitted,

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