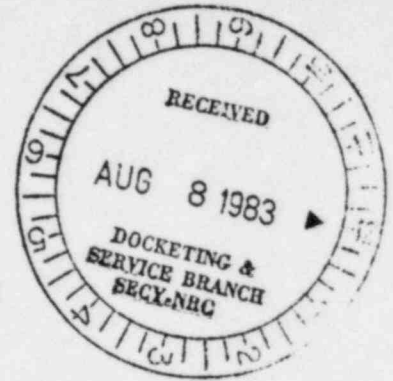


ORIGINAL

RELATED CORRESPONDENCE



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 No. 1 and 2)

Docket No. 50-275
50-323

(Reopened Hearing --
Design Quality
Assurance)

LICENSEE PACIFIC GAS AND ELECTRIC COMPANY'S
THIRD SET OF INTERROGATORIES TO GOVERNOR DEUKMEJIAN
AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

I

INTERROGATORIES

1. Identify each and every person you intend to
or may call as a witness during these proceedings. As to
each such witness, state:

(a) Name, occupation, occupational address and
telephone number.

(b) Whether the witness will render expert
testimony.

1 (c) If the witness will render expert testimony,
2 please list each specific subject matter about which the
3 witness will be expected to testify.

4 (d) If the witness will be called to give expert
5 testimony, please list the specific qualifications of the
6 witness that you contend would qualify the witness to give
7 opinion testimony on each specific subject matter about
8 which the witness will testify.

9 (e) List each and every professional article,
10 book, or the like, if any, the witness has authored or
11 co-authored concerning each specific subject matter set
12 forth in your answer to 1(c).

13 (f) Identify each and every document the witness
14 will rely on to reach any opinion testimony and specifically
15 corollate each such document (by page and paragraph number)
16 to each specific subject matter on which the witness will
17 render an opinion.

18 (g) As to each specific subject matter identified
19 in your answer to 1(c), identify by docket number and case
20 name each Nuclear Regulatory Commission licensing proceeding
21 where the witness has previously given expert testimony
22 concerning each specific subject matter.

23 (h) As to each proceeding identified in your
24 answer to 1(g), please state:

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26 ///

1 (i) The date(s) the expert testimony was
2 given.

3 (ii) Whether you have a copy of the testimony
4 given.

5 (iii) Whether you have a copy of the
6 transcript covering any or all of the witness'
7 examination and/or cross-examination for each such
8 proceeding.

9 (iv) Whether you have a copy of any notes
10 which the witness made in preparation for, or
11 utilized during, the witness' examination or
12 cross-examination in each such proceeding.

13 (i) As to each specific subject matter identified
14 in your answer to 1(c), identify by docket number and court
15 name each legal proceeding where the witness has previously
16 given expert testimony concerning each specific subject
17 matter.

18 (j) As to each proceeding identified in your
19 answer to 1(i), please state:

20 (i) The date(s) the expert testimony was
21 given.

22 (ii) Whether you have a copy of the
23 transcript covering any or all of the witness'
24 examination and/or cross-examination for each such
25 proceeding.

26 ///

1 (iii) Whether you have a copy of any notes
2 which the witness made in preparation for, or
3 utilized during, the witness' examination or
4 cross-examination in each such proceeding.
5 (k) As to each specific subject matter identified
6 in your answer to 1(c), identify committees and
7 organizations where the witness has previously given
8 testimony concerning each specific subject matter.
9 (l) As to each committee or organization
10 identified in 1(k), please state:
11 (i) The date(s) the testimony was given.
12 (ii) Whether you have a copy of the testimony
13 given.
14 (iii) Whether you have a copy of the
15 transcript covering any or all of the witness'
16 examination and/or cross-examination for each such
17 proceeding.
18 (iv) Whether you have a copy of any notes
19 which the witness made in preparation for, or
20 utilized during, the witness' testimony and/or
21 examination and/or cross-examination in each such
22 proceeding.
23 2. Please set forth with particularity each and
24 every exhibit you intend to mark for identification at the
25 reopened hearings on design quality assurance.
26 ///

3. List specifically, including page and section number, each and every license commitment set forth in the Diablo Canyon FSAR which you allege has not been complied with.

4. For each license commitment identified in your response to the preceding interrogatory, state in detail each and every fact upon which you base your allegation that the license commitment has not been met.

5. Specifically identify each and every document which you claim supports each fact set forth in your response to the preceding interrogatory and correlate each such document (by page and paragraph number) with each such fact.

II

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Pursuant to C.F.R. §2.241, you are requested to produce each document identified in the answers to the interrogatories above and in the answers to Licensee's Second Set of Interrogatories to Governor Deukmejian dated July 27, 1983.

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1 The documents should be produced on September 5,
2 1983 at 9:30 a.m. at the 31st floor conference room,
3 77 Beale Street, San Francisco.

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6
7 Respectfully submitted,

8
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26 Attorneys for
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By


Bruce Norton

DATED: August 4, 1983.