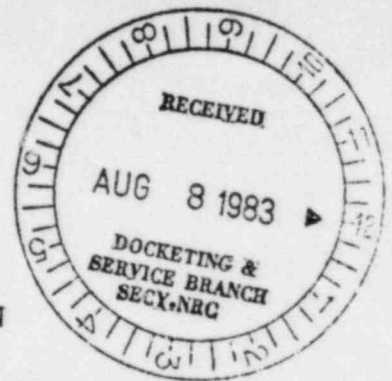


ORIGINAL



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	)	Docket No. 50-275
Diablo Canyon Nuclear Power Plant	)	50-323
Units No. 1 and 2	)	(Reopened Hearing --
	)	Design Quality
	)	Assurance)

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

Pursuant to 10 C.F.R. § 2.740b, Licensee PACIFIC  
GAS AND ELECTRIC COMPANY hereby propounds the following  
Interrogatories to JOINT INTERVENORS.

INSTRUCTIONS

1. All information is to be divulged which is in  
the possession of the individual, association, or corporate  
party, their attorneys, consultants, investigators, agents,  
employees, witnesses or other representatives of the named  
party.

1           2.   Where you have incomplete information that  
2 precludes your fully answering an Interrogatory, give such  
3 information as you have and state what information you do  
4 not have. If you are unable to give the information in the  
5 form sought but have the information aggregated differently,  
6 give the information in the form in which you have it and  
7 explain the reason for the deviation.

8           3.   When asked in the Interrogatories below to  
9 identify or to give the identity of a person, please give  
10 the following information about him or her:

11               (a) full name;

12               (b) present job title, employer, and  
13 telephone number.

14           4.   When asked in the Interrogatories below to  
15 identify or to give the identity of a document or writing,  
16 please give the following information about the document:

17               (a) its title, if any;

18               (b) its nature (e.g., letter, memorandum,  
19 chart, computer printout, ledger);

20               (c) the date, if any, stated on the  
21 document;

22               (d) the identity of each person who signed  
23 it;

24               (e) the identity of each person to whom it  
25 is addressed;

26    ///

1           5.   Where an individual Interrogatory calls for  
2 an answer which involves more than one part, each part of  
3 the answer should be clearly set out so that it is  
4 understandable.

5           6.   These Interrogatories are intended as  
6 continuing Interrogatories, requiring you to answer by  
7 supplemental answer, setting forth any information within  
8 the scope of the Interrogatories as may be acquired by you,  
9 your agents, attorneys or representatives following your  
10 original answers up to the time of hearing.

11           7.   "Documents" include printed material, writ-  
12 ings, handwritten notes, photographs, xerox reproductions,  
13 and audio or video recordings. "Writings" and "recordings"  
14 consist of letters, words, or numbers, or their equivalent,  
15 set down by handwriting, typewriting, printing,  
16 photostating, photographing, magnetic impulse, mechanical or  
17 electronic recording, or other form of data compilation, as  
18 defined in Rule 1001 of the Federal Rules of Evidence, 28  
19 U.S.C.

#### 20                   INTERROGATORIES

21           1.   State each and every fact upon which you base  
22 your contention that the Licensee has failed to develop and  
23 implement in a timely fashion a quality assurance/quality  
24 control program for the design and redesign of structures,  
25 systems and components important to safety at Diablo Canyon  
26 since November 1, 1981.

1           2.     State each and every fact upon which you base  
2 your contention that the Licensee's major subcontractors  
3 have failed to develop and implement in a timely fashion a  
4 quality assurance/quality control program for the design and  
5 redesign of structures, systems and components important to  
6 safety at Diablo Canyon since November 1, 1981.

7           3.     Please list each and every major subcontractor  
8 for Diablo Canyon Units 1 and 2 whom you consider to  
9 have been involved in the design of structures and/or  
10 systems and/or components important to safety.

11     (a) For each such subcontractor state:

12         (i) the time period when the subcontractor did design  
13 of structures, systems and components important to  
14 safety for Diablo Canyon Units 1 and 2.

15         (ii) the time period you allege when the subcontractor  
16 did not develop and implement a quality  
17 assurance/quality control program.

18           4.     For each and every major subcontractor for  
19 Diablo Canyon Units 1 and 2, state specifically each and  
20 every fact you rely on as a basis for your allegation that  
21 each such subcontractor's design quality assurance program  
22 failed to comply with criterion 1 of Appendix B to 10 C.F.R.  
23 Part 50 prior to November 1, 1981.

24           5.     For each and every major subcontractor for  
25 Diablo Canyon Units 1 and 2, state specifically each and  
26 every fact you rely on as a basis for your allegation that

1 each such subcontractor's design quality assurance program  
2 failed to comply with criterion 2 of Appendix B to 10 C.F.R.  
3 Part 50 prior to November 1, 1981.

4 6. For each and every major subcontractor for  
5 Diablo Canyon Units 1 and 2, state specifically each and  
6 every fact you rely on as a basis for your allegation that  
7 each such subcontractor's design quality assurance program  
8 failed to comply with criterion 3 of Appendix B to 10 C.F.R.  
9 Part 50 prior to November 1, 1981.

10 7. For each and every major subcontractor for  
11 Diablo Canyon Units 1 and 2, state specifically each and  
12 every fact you rely on as a basis for your allegation that  
13 each such subcontractor's design quality assurance program  
14 failed to comply with criterion 4 of Appendix B to 10 C.F.R.  
15 Part 50 prior to November 1, 1981.

16 8. For each and every major subcontractor for  
17 Diablo Canyon Units 1 and 2, state specifically each and  
18 every fact you rely on as a basis for your allegation that  
19 each such subcontractor's design quality assurance program  
20 failed to comply with criterion 5 of Appendix B to 10 C.F.R.  
21 Part 50 prior to November 1, 1981.

22 9. For each and every major subcontractor for  
23 Diablo Canyon Units 1 and 2, state specifically each and  
24 every fact you rely on as a basis for your allegation that  
25 each such subcontractor's design quality assurance program

26 ///



1 failed to comply with criterion 6 of Appendix B to 10 C.F.R.  
2 Part 50 prior to November 1, 1981.

3 10. For each and every major subcontractor for  
4 Diablo Canyon Units 1 and 2, state specifically each and  
5 every fact you rely on as a basis for your allegation that  
6 each such subcontractor's design quality assurance program  
7 failed to comply with criterion 7 of Appendix B to 10 C.F.R.  
8 Part 50 prior to November 1, 1981.

9 11. For each and every major subcontractor for  
10 Diablo Canyon Units 1 and 2, state specifically each and  
11 every fact you rely on as a basis for your allegation that  
12 each such subcontractor's design quality assurance program  
13 failed to comply with criterion 10 of Appendix B to 10  
14 C.F.R. Part 50 prior to November 1, 1981.

15 12. For each and every major subcontractor for  
16 Diablo Canyon Units 1 and 2, state specifically each and  
17 every fact you rely on as a basis for your allegation that  
18 each such subcontractor's design quality assurance program  
19 failed to comply with criterion 11 of Appendix B to 10  
20 C.F.R. Part 50 prior to November 1, 1981.

21 13. For each and every major subcontractor for  
22 Diablo Canyon Units 1 and 2, state specifically each and  
23 every fact you rely on as a basis for your allegation that  
24 each such subcontractor's design quality assurance program  
25 failed to comply with criterion 16 of Appendix B to 10  
26 C.F.R. Part 50 prior to November 1, 1981.

1           14. For each and every major subcontractor for  
2 Diablo Canyon Units 1 and 2, state specifically each and  
3 every fact you rely on as a basis for your allegation that  
4 each such subcontractor's design quality assurance program  
5 failed to comply with criterion 17 of Appendix B to 10  
6 C.F.R. Part 50 prior to November 1, 1981.

7           15. For each and every major subcontractor for  
8 Diablo Canyon Units 1 and 2, state specifically each and  
9 every fact you rely on as a basis for your allegation that  
10 each such subcontractor's design quality assurance program  
11 failed to comply with criterion 18 of Appendix B to 10  
12 C.F.R. Part 50 prior to November 1, 1981.

13           16. For each and every major subcontractor for  
14 Diablo Canyon Units 1 and 2, state specifically each and  
15 every fact you rely on as a basis for your allegation that  
16 each such subcontractor's design quality assurance program  
17 failed to comply with criterion 1 of Appendix B to 10 C.F.R.  
18 Part 50 since November 1, 1981.

19           17. For each and every major subcontractor for  
20 Diablo Canyon Units 1 and 2, state specifically each and  
21 every fact you rely on as a basis for your allegation that  
22 each such subcontractor's design quality assurance program  
23 failed to comply with criterion 2 of Appendix B to 10 C.F.R.  
24 Part 50 since November 1, 1981.

25           18. For each and every major subcontractor for  
26 Diablo Canyon Units 1 and 2, state specifically each and

1 every fact you rely on as a basis for your allegation that  
2 each such subcontractor's design quality assurance program  
3 failed to comply with criterion 3 of Appendix B to 10 C.F.R.  
4 Part 50 since November 1, 1981.

5 19. For each and every major subcontractor for  
6 Diablo Canyon Units 1 and 2, state specifically each and  
7 every fact you rely on as a basis for your allegation that  
8 each such subcontractor's design quality assurance program  
9 failed to comply with criterion 4 of Appendix B to 10 C.F.R.  
10 Part 50 since November 1, 1981.

11 20. For each and every major subcontractor for  
12 Diablo Canyon Units 1 and 2, state specifically each and  
13 every fact you rely on as a basis for your allegation that  
14 each such subcontractor's design quality assurance program  
15 failed to comply with criterion 5 of Appendix B to 10 C.F.R.  
16 Part 50 since November 1, 1981.

17 21. For each and every major subcontractor for  
18 Diablo Canyon Units 1 and 2, state specifically each and  
19 every fact you rely on as a basis for your allegation that  
20 each such subcontractor's design quality assurance program  
21 failed to comply with criterion 6 of Appendix B to 10 C.F.R.  
22 Part 50 since November 1, 1981.

23 22. For each and every major subcontractor for  
24 Diablo Canyon Units 1 and 2, state specifically each and  
25 every fact you rely on as a basis for your allegation that  
26 each such subcontractor's design quality assurance program



1 failed to comply with criterion 7 of Appendix B to 10 C.F.R.  
2 Part 50 since November 1, 1981.

3 23. For each and every major subcontractor for  
4 Diablo Canyon Units 1 and 2, state specifically each and  
5 every fact you rely on as a basis for your allegation that  
6 each such subcontractor's design quality assurance program  
7 failed to comply with criterion 10 of Appendix B to 10  
8 C.F.R. Part 50 since November 1, 1981.

9 24. For each and every major subcontractor for  
10 Diablo Canyon Units 1 and 2, state specifically each and  
11 every fact you rely on as a basis for your allegation that  
12 each such subcontractor's design quality assurance program  
13 failed to comply with criterion 11 of Appendix B to 10  
14 C.F.R. Part 50 since November 1, 1981.

15 25. For each and every major subcontractor for  
16 Diablo Canyon Units 1 and 2, state specifically each and  
17 every fact you rely on as a basis for your allegation that  
18 each such subcontractor's design quality assurance program  
19 failed to comply with criterion 16 of Appendix B to 10  
20 C.F.R. Part 50 since November 1, 1981.

21 26. For each and every major subcontractor for  
22 Diablo Canyon Units 1 and 2, state specifically each and  
23 every fact you rely on as a basis for your allegation that  
24 each such subcontractor's design quality assurance program  
25 failed to comply with criterion 17 of Appendix B to 10  
26 C.F.R. Part 50 since November 1, 1981.

1           27. For each and every major subcontractor for  
2 Diablo Canyon Units 1 and 2, state specifically each and  
3 every fact you rely on as a basis for your allegation that  
4 each such subcontractor's design quality assurance program  
5 failed to comply with criterion 18 of Appendix B to 10  
6 C.F.R. Part 50 since November 1, 1981.

7           28. State specifically each and every fact you  
8 rely on as a basis for your allegation that the Licensee's  
9 design quality assurance program for Diablo Canyon Units 1  
10 and 2 failed to comply with criterion 1 of Appendix B to 10  
11 C.F.R. Part 50 since November 1, 1981.

12           29. State specifically each and every fact you  
13 rely on as a basis for your allegation that the Licensee's  
14 design quality assurance program for Diablo Canyon Units 1  
15 and 2 failed to comply with criterion 2 of Appendix B to 10  
16 C.F.R. Part 50 since November 1, 1981.

17           30. State specifically each and every fact you  
18 rely on as a basis for your allegation that the Licensee's  
19 design quality assurance program for Diablo Canyon Units 1  
20 and 2 failed to comply with criterion 3 of Appendix B to 10  
21 C.F.R. Part 50 since November 1, 1981.

22           31. State specifically each and every fact you  
23 rely on as a basis for your allegation that the Licensee's  
24 design quality assurance program for Diablo Canyon Units 1  
25 and 2 failed to comply with criterion 4 of Appendix B to 10  
26 C.F.R. Part 50 since November 1, 1981.

1           32. State specifically each and every fact you  
2 rely on as a basis for your allegation that the Licensee's  
3 design quality assurance program for Diablo Canyon Units 1  
4 and 2 failed to comply with criterion 5 of Appendix B to 10  
5 C.F.R. Part 50 since November 1, 1981.

6           33. State specifically each and every fact you  
7 rely on as a basis for your allegation that the Licensee's  
8 design quality assurance program for Diablo Canyon Units 1  
9 and 2 failed to comply with criterion 6 of Appendix B to 10  
10 C.F.R. Part 50 since November 1, 1981.

11           34. State specifically each and every fact you  
12 rely on as a basis for your allegation that the Licensee's  
13 design quality assurance program for Diablo Canyon Units 1  
14 and 2 failed to comply with criterion 7 of Appendix B to 10  
15 C.F.R. Part 50 since November 1, 1981.

16           35. State specifically each and every fact you  
17 rely on as a basis for your allegation that the Licensee's  
18 design quality assurance program for Diablo Canyon Units 1  
19 and 2 failed to comply with criterion 10 of Appendix B to 10  
20 C.F.R. Part 50 since November 1, 1981.

21           36. State specifically each and every fact you  
22 rely on as a basis for your allegation that the Licensee's  
23 design quality assurance program for Diablo Canyon Units 1  
24 and 2 failed to comply with criterion 11 of Appendix B to 10  
25 C.F.R. Part 50 since November 1, 1981.

26    ///

1           37. State specifically each and every fact you  
2 rely on as a basis for your allegation that the Licensee's  
3 design quality assurance program for Diablo Canyon Units 1  
4 and 2 failed to comply with criterion 16 of Appendix B to 10  
5 C.F.R. Part 50 since November 1, 1981.

6           38. State specifically each and every fact you  
7 rely on as a basis for your allegation that the Licensee's  
8 design quality assurance program for Diablo Canyon Units 1  
9 and 2 failed to comply with criterion 17 of Appendix B to 10  
10 C.F.R. Part 50 since November 1, 1981.

11           39. State specifically each and every fact you  
12 rely on as a basis for your allegation that the Licensee's  
13 design quality assurance program for Diablo Canyon Units 1  
14 and 2 failed to comply with criterion 18 of Appendix B to 10  
15 C.F.R. Part 50 since November 1, 1981.

16           40. Please identify each and every document which  
17 you claim supports each fact set forth in your responses to  
18 Interrogatories 1 through 39 above and correlate each such  
19 document as specifically as possible (page and paragraph  
20 number) with each such fact.

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

25           42. For each license commitment identified in the  
26 preceding response, state specifically each and every fact

1 upon which you base your allegation that the license  
2 commitment has not been met.

3 43. Please identify each and every document which  
4 you claim supports each fact set forth in the preceding  
5 response and correlate each such document (page and  
6 paragraph number) with each such fact.

7 44. List specifically each and every license  
8 commitment set forth in the Diablo Canyon FSAR which you  
9 allege has not been achieved as a result of the Licensee's  
10 design quality assurance program since November 1, 1981.

11 45. State specifically each and every fact upon  
12 which you base your allegation that the Licensee's design  
13 quality assurance program since November 1, 1981 has caused  
14 commitments in the Diablo Canyon FSAR not to be achieved.

15 46. Please identify each and every document which  
16 you claim supports each fact set forth in the preceding  
17 response and correlate each such document (page and  
18 paragraph number) with each such fact.

19 47. List specifically each and every license  
20 commitment set forth in the Diablo Canyon FSAR which you  
21 allege has not been achieved as a result of major  
22 subcontractors' design quality assurance programs since  
23 November 1, 1981.

24 48. State specifically each and every fact upon  
25 which you base your allegation that major subcontractors'  
26 design quality assurance programs since November 1, 1981



1           55. Please identify each and every document which  
2 you claim supports each fact set forth in the preceding  
3 response and correlate each such document (page and  
4 paragraph number) with each such fact.

5           56. For each and every major subcontractor for  
6 Diablo Canyon Units 1 and 2 since November 1, 1981, list  
7 specifically each and every portion of each such  
8 subcontractor's design quality assurance program which you  
9 believe to be deficient.

10          57. State each and every fact upon which you base  
11 your judgment regarding each such deficiency for each such  
12 portion of each such subcontractor's design quality  
13 assurance program.

14          58. Please identify each and every document which  
15 you claim supports each fact set forth in the preceding  
16 response and correlate each such document (page and  
17 paragraph number) with each such fact.

18          59. For each and every major subcontractor for  
19 Diablo Canyon Units 1 and 2 since November 1, 1981, list  
20 specifically each and every implementing procedure of each  
21 such subcontractor's design quality assurance program which  
22 you believe to be deficient.

23          60. State each and every fact upon which you base  
24 your judgment regarding each such deficiency for each such  
25 implementing procedure of each such subcontractor's design  
26 quality assurance program.

1           61. Please identify each and every document which  
2 you claim supports each fact set forth in the preceding  
3 response and correlate each such document (page and  
4 paragraph number) with each such fact.

5           62. Do you believe there are any of the 18  
6 criteria of Appendix B to 10 C.F.R. Part 50 which the  
7 Licensee's design quality assurance program does not  
8 address?

9           If so, please list each such criterion.

10          63. State specifically each and every fact upon  
11 which you base your allegation that the criteria specified  
12 in the preceding response have not been addressed by  
13 Licensee's design quality assurance program.

14          64. Please identify each and every document which  
15 you claim supports each fact set forth in the preceding  
16 response and correlate each such document (page and  
17 paragraph number) with each such fact.

18          65. Do you believe there are any of the 18  
19 criteria of Appendix B to 10 C.F.R. Part 50 which any of the  
20 major subcontractor's design quality assurance programs do  
21 not address?

22           If so, for each such subcontractor, list each  
23 such criterion.

24          66. State specifically each and every fact upon  
25 which you base your allegation that the criteria specified

26       ///

1 in the preceding response have not been addressed by major  
2 subcontractors' design quality assurance programs.

3 67. Please identify each and every document which  
4 you claim supports each fact set forth in the preceding  
5 response and correlate each such document (page and  
6 paragraph number) with each such fact.

7 68. List specifically each and every "applicable  
8 regulatory standard" which you allege has not been complied  
9 with as a result of the Licensee's design quality assurance  
10 program.

11 69. For each regulatory standard identified in  
12 the preceding response, state specifically each and every  
13 fact upon which you base your allegation that such standard  
14 has not been met.

15 70. Please identify each and every document which  
16 you claim supports each fact set forth in the preceding  
17 response and correlate each such document (page and  
18 paragraph number) with each such fact.

19 71. For each applicable regulatory standard  
20 identified in your answer to Interrogatory 68, state  
21 specifically each and every fact upon which you base your  
22 allegation that neither the ITP nor the IDVP has provided  
23 reasonable assurance of compliance with such standard.

24 72. Please identify each and every document which  
25 you claim supports each fact set forth in the preceding

26 ///

1 response and correlate each such document (page and  
2 paragraph number) with each such fact.

3 73. State each and every fact upon which you base  
4 your allegation that the IDVP is inadequate.

5 74. Please identify each and every document which  
6 you claim supports each fact set forth in the preceding  
7 response and correlate each such document as specifically as  
8 possible (page and paragraph number) with each such fact.

9 75. State each and every fact upon which you base  
10 your allegation that the scope of the IDVP's review is  
11 inadequate.

12 76. Please identify each and every document which  
13 you claim supports each fact set forth in the preceding  
14 response and correlate each such document as specifically as  
15 possible (page and paragraph number) with each such fact.

16 77. State each and every fact upon which you base  
17 your allegation that the IDVP did not address  
18 nonsafety-grade SS&Cs important to safety.

19 78. Please identify each and every document which  
20 you claim supports each fact set forth in the preceding  
21 response and correlate each such document as specifically as  
22 possible (page and paragraph number) with each such fact.

23 79. State each and every fact upon which you base  
24 your allegation that the IDVP utilized sampling rather than  
25 100% reverification of nonseismic SS&Cs.

26 ///

1           80. Please identify each and every document which  
2 you claim supports each fact set forth in the preceding  
3 response and correlate each such document as specifically as  
4 possible (page and paragraph number) with each such fact.

5           81. State each and every fact upon which you base  
6 your allegation that the IDVP did not adequately describe  
7 the statistical basis for the criteria to be used in the  
8 selection of a suitable number and type of samples under the  
9 program and for the selection of items for additional  
10 verification.

11           82. Please identify each and every document which  
12 you claim supports each fact set forth in the preceding  
13 response and correlate each such document as specifically as  
14 possible (page and paragraph number) with each such fact.

15           83. State each and every fact upon which you base  
16 your allegation that the IDVP did not verify independently  
17 the accuracy or propriety of PGandE's recalculation of the  
18 seismic design of the facility.

19           84. Please identify each and every document which  
20 you claim supports each fact set forth in the preceding  
21 response and correlate each such document as specifically as  
22 possible (page and paragraph number) with each such fact.

23           85. State each and every fact upon which you base  
24 your allegation that the IDVP failed to assure that an  
25 adequate QA/QC program for the corrective action program has  
26 been established and is being implemented.



1           86. Please identify each and every document which  
2 you claim supports each fact set forth in the preceding  
3 response and correlate each such document as specifically as  
4 possible (page and paragraph number) with each such fact.

5           87. Identify specifically each and every finding  
6 and recommendation of the Brookhaven National Laboratory  
7 ("BNL") which you allege should be incorporated into the  
8 Diablo Canyon design.

9           88. Identify each and every regulation which you  
10 believe requires that each finding and recommendation of BNL  
11 specified in the preceding response are required to be  
12 incorporated into the Diablo Canyon design.

13           89. Please identify each and every document which  
14 you claim supports each fact set forth in the preceding  
15 response and correlate each such document (page and  
16 paragraph number) with each such fact.

17           90. State each and every fact upon which you base  
18 your allegation that the IDVP failed to assure that the  
19 findings and recommendations of BNL have been fully  
20 incorporated into the Diablo Canyon design.

21           91. Please identify each and every document which  
22 you claim supports each fact set forth in the preceding  
23 response and correlate each such document as specifically as  
24 possible (page and paragraph number) with each such fact.

25           92. State each and every fact upon which you base  
26 your allegation that the IDVP failed to verify that the

1 redesign has actually been incorporated into the "as-built"  
2 facility.

3 93. Please identify each and every document which  
4 you claim supports each fact set forth in the preceding  
5 response and correlate each such document as specifically as  
6 possible (page and paragraph number) with each such fact.

7 94. State each and every fact upon which you base  
8 your allegation that the IDVP failed to identify and  
9 eliminate the "root cause" of the seismic and nonseismic  
10 design errors discovered at the plant.

11 95. Please identify each and every document which  
12 you claim supports each fact set forth in the preceding  
13 response and correlate each such document as specifically as  
14 possible (page and paragraph number) with each such fact.

15 96. State each and every fact upon which you base  
16 your allegation that the Interim Technical Reports issued by  
17 the IDVP fail to document adequately the basis for the IDVP  
18 findings, recommendations and/or conclusions set forth in  
19 such reports.

20 97. Please identify each and every document which  
21 you claim supports each fact set forth in the preceding  
22 response and correlate each such document as specifically as  
23 possible (page and paragraph number) with each such fact.

24 98. Specifically identify each and every test  
25 referred to in your proposed contentions "previously  
26 conducted with respect to any Diablo Canyon SS&C which have

1 been affected by the redesign conducted since September  
2 1981."

3 99. Please identify each and every document which  
4 you claim supports each fact set forth in the preceding  
5 response and correlate each such document (page and  
6 paragraph number) with each such fact.

7 100. For each and every "previously conducted"  
8 test referred to in your contentions, explain in detail why  
9 the alleged inadequacies in the design quality assurance  
10 programs would require verification of the validity of the  
11 results of such tests.

12 101. Please identify each and every document which  
13 you claim supports each fact set forth in the preceding  
14 response and correlate each such document (page and  
15 paragraph number) with each such fact.

16 102. State each and every fact upon which you base  
17 your allegation that PGandE failed to systematically review  
18 and verify the validity of all results of tests previously  
19 conducted with respect to any Diablo Canyon SS&C which have  
20 been affected by the redesign since September 1981.

21 103. Please identify each and every document which  
22 you claim supports each fact set forth in the preceding  
23 response and correlate each such document as specifically as  
24 possible (page and paragraph number) with each such fact.

25 104. Identify and describe all "additional  
26 testing" referred to in your contentions which you allege is

1 "required to demonstrate that as redesigned and modified all  
2 Diablo Canyon SS&C's will perform satisfactorily in  
3 service."

4 105. Please identify each and every document which  
5 you claim supports each fact set forth in the preceding  
6 response and correlate each such document (page and  
7 paragraph number) with each such fact.

8 106. Identify each and every written test  
9 procedure of PGandE or its subcontractors referred to in  
10 your contentions which are prescribed by Criterion 11 of  
11 Appendix B to 10 C.F.R. Part 50.

12 107. Please identify each and every document which  
13 you claim supports each fact set forth in the preceding  
14 response and correlate each such document (page and  
15 paragraph number) with each such fact.

16 108. State each and every fact upon which you base  
17 your allegation that PGandE failed to identify and perform  
18 the additional testing required to demonstrate that as  
19 redesigned and modified all Diablo Canyon SS&Cs will perform  
20 satisfactorily in service.

21 109. Please identify each and every document which  
22 you claim supports each fact set forth in the preceding  
23 response and correlate each such document as specifically as  
24 possible (page and paragraph number) with each such fact.

25 110. For Interrogatories 71, 73, 75, 77, 79, 81,  
26 83, 85, 87, 88, 90, 92, 94, and 96, state specifically

1 (section #, page and line, etc.) where in the regulations,  
2 the Commission order of November 19, 1981, the Denton letter  
3 of November 19, 1981, or the IDVP's Phase I and II program  
4 plans that the activity (or lack thereof) by the IDVP you  
5 allege did (or did not) take place is required to take (or  
6 not take) place.

7 111. Define "root cause" as used in your proposed  
8 contentions.

9 112. Please list each regulation, or regulatory  
10 guide, by specific section and/or subsection, which requires  
11 the identification of a "root" cause when a deviation  
12 occurs, or at any time, or which defines "root cause."

13 113. For each answer to these interrogatories, and  
14 all subparts thereto, identify each person who participated

15 ///

16 ///

17 ///



1 in the preparation of your answers pursuant to 10 C.F.R.  
2 § 2.740b(b).  
3

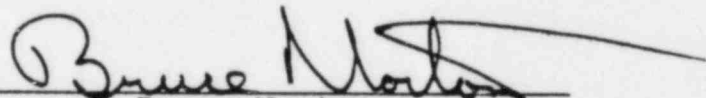
4 Respectfully submitted,

5 ROBERT OHLBACH  
6 PHILIP A. CRANE, JR.  
7 RICHARD F. LOCKE  
8 Pacific Gas and Electric Company  
9 P.O. Box 7442  
10 San Francisco, California 94120  
11 (415) 781-4211

12 ARTHUR C. GEHR  
13 Snell & Wilmer  
14 3100 Valley Center  
15 Phoenix, Arizona 85073  
16 (602) 257-7288

17 BRUCE NORTON  
18 Norton, Burke, Berry & French, P.C.  
19 P.O. Box 10569  
20 Phoenix, Arizona 85064  
21 (602) 955-2446

22 Attorneys for  
23 Pacific Gas and Electric Company  
24

25 By   
26 Bruce Norton

20 DATED: August 4, 1983.  
21  
22  
23  
24  
25  
26

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



In the Matter of )  
 )  
PACIFIC GAS AND ELECTRIC COMPANY )  
 )  
Diablo Canyon Nuclear Power Plant, )  
Units 1 and 2 )  
\_\_\_\_\_ )

Docket No. 50-275  
Docket No. 50-323

CERTIFICATE OF SERVICE

The foregoing documents of Pacific Gas and Electric Company have been served today:

1. Licensee Pacific Gas and Electric Company's Third Set of Interrogatories to Governor Deukmejian and Second Request for Production of Documents
2. Licensee Pacific Gas and Electric Company's Second Set of Interrogatories to Joint Intervenor and Request for Production of Documents

The above-mentioned documents have been served today on the following by deposit in the United States mail, properly stamped and addressed:

Judge John F. Wolf  
Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Judge Glenn O. Bright  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Judge Jerry R. Kline  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mrs. Elizabeth Apfelberg  
c/o Betsy Umhoffer  
1493 Southwood  
San Luis Obispo, CA 93401

Mrs. Sandra A. Silver  
1760 Alisal Street  
San Luis Obispo, CA 93401

Mr. Gordon Silver  
1760 Alisal Street  
San Luis Obispo, CA 93401

\* John Phillips, Esq.  
Joel Reynolds, Esq.  
Center for Law in the Public Interest  
10951 W. Pico Blvd., Suite 300  
Los Angeles, CA 90064

David F. Fleischaker, Esq.  
P. O. Box 1178  
Oklahoma City, OK 73101

Arthur C. Gehr, Esq.  
Snell & Wilmer  
3100 Valley Bank Center  
Phoenix, AZ 85073

Janice E. Kerr, Esq.  
Public Utilities Commission  
State of California  
5246 State Building  
350 McAllister Street  
San Francisco, CA 94102

Mrs. Raye Fleming  
1920 Mattie Road  
Shell Beach, CA 93449

Chairman  
Atomic Safety and Licensing  
Appeal Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Docketing and Service  
Section

Lawrence J. Chandler, Esq.  
Henry J. McGurran  
U.S. Nuclear Regulatory Commission  
Office of Executive Legal Director  
Washington, D.C. 20555

Mr. Richard B. Hubbard  
MHB Technical Associates  
1723 Hamilton Avenue, Suite K  
San Jose, CA 95125

Mr. Carl Neiberger  
Telegram Tribune  
P. O. Box 112  
San Luis Obispo, CA 93402

Mr. Frederick Eissler  
Scenic Shoreline Preservation  
Conference, Inc.  
4623 More Mesa Drive  
Santa Barbara, CA 93105

Bruce Norton, Esq.  
Norton, Burke, Berry & French, P.C.  
P. O. Box 10569  
Phoenix, AZ 85064

Chairman  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Judge Thomas S. Moore  
Chairman  
Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Judge W. Reed Johnson  
Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

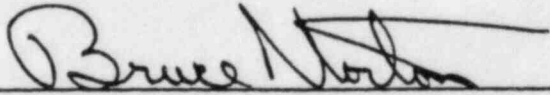
Judge John H. Buck  
Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

\*Michael J. Strumwasser, Esq.  
Susan L. Durbin, Esq.  
Peter H. Kaufman, Esq.  
3580 Wilshire Blvd., Suite 800  
Los Angeles, CA 90010

Maurice Axelrad, Esq.  
Lowenstein, Newman, Reis, and  
Axelrad, P.C.  
1025 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Date: August 4, 1983

\*Express Mail

  
\_\_\_\_\_  
Pacific Gas and Electric Company