

UNITED STATES OF AMERICA

DOCKETED
USNRC

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD 82 OCT 3 11:19

In the Matter of)

PACIFIC GAS AND ELECTRIC COMPANY)

(Diablo Canyon Nuclear Power
Plant, Units 1 and 2))OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHDocket Nos. 50-275 O.L.
50-323 O.L.(Reopened Hearing --
Design Quality
Assurance)JOINT INTERVENORS' SUPPLEMENTAL
RESPONSE TO PACIFIC GAS AND ELECTRIC COMPANY'S
SECOND SET OF INTERROGATORIES

Joint Intervenors submit the following supplemental response to Pacific Gas and Electric Company's ("PGandE") Second Set of Interrogatories.

RESPONSE TO INTERROGATORY NO. 1:

Joint Intervenors' review of the FSAR, IDVP Final Report, PGandE Phase I and II Final Reports, ITRs, SER Supplement 18, the PGandE/Bechtel Diablo Canyon Project QA Manual and the PGandE Engineering Department Procedures Manual, although not complete, has disclosed the following deficiencies indicating the failure to develop an adequate Quality Assurance ("QA") Program:

(a) FSAR § 17.0 limits PGandE compliance with Appendix B to "the extent possible."

(b) ASLAB Construction QA Hearing Transcript at pp. 465-66 indicates PGandE compliance with Appendix B "as practicable."

(c) PGandE QA Manual excludes Unit 1 from its scope.

(d) SER Supplement 18 indicates that Brookhaven National Laboratory ("BNL") discovered discrepancies in reanalysis and verification of vertical response of the annulus.

(e) SER Supplement 18 indicates that BNL discovered discrepancies in verification of piping by Westinghouse and buried diesel tanks by Harding and Lawson.

(f) ITR 4 reveals numerous deficiencies in the Internal Technical Program's ("ITP") QA program and implementation.

(g) PGandE's Engineering Department Procedures are deficient in that the Q-List does not unambiguously provide responsibility for classification of structures, systems and components ("SS&Cs"), revisions to references are not provided, and regular Q-List distribution is not specified.

(h) Error Open Items ("EOI") 1123-1126, 1128, 1129, and 1131-1142 reveal numerous QA inadequacies.

The above list is only partially complete since the Joint Intervenor's review of all relevant documents is not yet complete.

RESPONSE TO INTERROGATORY NO. 2:

Joint Intervenor's review of the IDVP Final Report, the PGandE Phase I and II Final Reports, ITRs, SER Supplement 18, the Bechtel Project Engineer's Instruction Manual for the Diablo Canyon Project, Bechtel Topical Report BQ-TOP-1, Rev.

3A as modified by PGandE's letter dated June 18, 1982, and the Bechtel Quality Assurance Department Procedures Manual, although not yet complete, has disclosed the following deficiencies in the QA programs of PGandE's major subcontractors:

(a) Regarding Bechtel Instruction No. 5, the internal design interfaces and responsibilities were not provided until the revision dated March 11, 1983.

(b) See responses 1(d) and 1(e) supra.

RESPONSE TO INTERROGATORY NO. 3:

The information requested by this interrogatory is more readily available to PGandE than to the Joint Intervenors. Furthermore, the Appeal Board has ruled that Joint Intervenors' contention regarding non-safety grade SS&Cs important to safety is outside the scope of the reopened proceeding; thus, interrogatories directed to that issue are irrelevant.

RESPONSE TO INTERROGATORY NOS. 16-27:

Because of the fact that many of the criteria of Appendix B are interrelated, it is not possible to specify with precision the criterion violated by each and every deficiency. See Response to Interrogatory No. 2.

RESPONSE TO INTERROGATORY NOS. 28-46:

See Response to Interrogatory No. 1.

RESPONSE TO INTERROGATORY NOS. 47-49:

See Response to Interrogatory No. 2.

RESPONSE TO INTERROGATORY NOS. 50-55:

See Response to Interrogatory No. 1.

RESPONSE TO INTERROGATORY NOS. 56-61:

See Response to Interrogatory No. 2.

RESPONSE TO INTERROGATORY NOS. 65-67:

See Response to Interrogatory No. 2

RESPONSE TO INTERROGATORY NOS. 68-70:

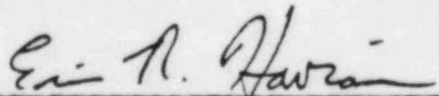
See Responses to Interrogatory Nos. 1 and 2.

DATED: September 29, 1983

Respectfully submitted,

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Plant, Units 1 and 2))

Docket Nos. 50-275 O.L.
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CERTIFICATION

I, Eric R. Havian, hereby certify:

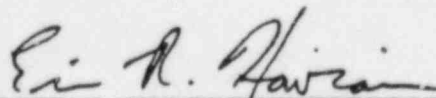
1. I am one of the attorneys for the Joint Intervenors in the above-entitled proceeding and, as such, am authorized to execute this certification.

2. I have read the foregoing Joint Intervenors' Response to Pacific Gas and Electric Company's Second Set of Interrogatories and know the contents thereof.

3. I am informed and believe said answers to be true and correct.

I certify under penalty of perjury that the foregoing is true and correct.

Executed at San Francisco, California, on September 29, 1983.



ERIC R. HAVIAN

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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of September, 1983, I have served copies of the foregoing JOINT INTERVENORS' SUPPLEMENTAL RESPONSE TO PACIFIC GAS AND ELECTRIC COMPANY'S SECOND SET OF INTERROGATORIES, mailing them through the U.S. mails, first class, postage prepaid.

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