

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION OCT 24 12:30

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)
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PACIFIC GAS AND ELECTRIC COMPANY)

(Diablo Canyon Nuclear Power)
Plant, Units 1 and 2))
)
)
_____)

Docket Nos. 50-275 O.L.
50-323 O.L.

JOINT INTERVENORS' OBJECTIONS
TO EXHIBITS AND TESTIMONY OF
PG&E AND NRC STAFF

Pursuant to the Board's October 7, 1983 Order, the Joint Intervenors hereby state their objections to the following exhibits and testimony by the NRC Staff and PG&E, respectively:

1. NRC Staff Testimony of James P. Knight, Hartmut E. Schierling and Jared S. Wermeil on Contentions 1a, 1b, 1c, 1d and 1e.

Joint Intervenors object to questions and answers 37 and 38. The basis for this objection is that these questions and answers constitute opinion testimony about the value of statistics and statistical analysis in the evaluation of overall design adequacy, despite the fact that the resumes of the individuals offering the testimony indicate no training in

statistics. Joint Intervenors therefore move that this testimony be stricken, or, in the alternative, that the Joint Intervenors be allowed voir dire questioning of these witnesses at the hearing.

2. NRC Staff Testimony of James P. Knight, Hartmut E. Schierling and Jared S. Wermeil on Contentions 2a, 2b, 2c and 2d.

Joint Intervenors object to questions and answers 18 and 19. The basis for this objection is that these questions and answers constitute opinion testimony about the value of statistics and statistical analysis in the evaluation of overall design adequacy, despite the fact that the resumes of the individuals offering the testimony indicate no training in statistics. Joint Intervenors therefore move that this testimony be stricken, or, in the alternative, that the Joint Intervenors be allowed voir dire questioning of these witnesses at the hearing.

3. PGandE Testimony of Panel No. 1 on Contentions 1, 2 and 5.

Joint Intervenors object to question and answer number 6 in its entirety. Joint Intervenors also object to the conclusions stated at page 21, lines 13-17, and page 21, lines 22-26, to the effect that the ITP approach and IDVP approach provide a higher degree of assurance than statistical sampling. The basis for this objection is that this testimony contains opinions about the value of statistics and statistical analysis in the evaluation of overall design adequacy, despite the fact

that the resumes of the individuals offering the testimony indicate no training in statistics. Joint Intervenors therefore move that this testimony be stricken, or, in the alternative, that the Joint Intervenors be allowed voir dire questioning of these witnesses at the hearing.

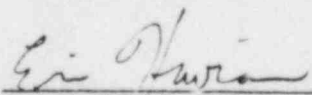
Consistent with the Board's Order dated October 7, 1983, counsel for the Joint Intervenors contacted counsel for the NRC Staff and PGandE to discuss the above objections, but were unable to resolve them.

DATED: October 20, 1983

Respectfully submitted,

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I hereby certify that on this 20th day of October, 1983, I have served copies of the foregoing JOINT INTERVENORS' OBJECTIONS TO EXHIBITS AND TESTIMONY OF PGandE AND NRC STAFF, mailing them through the U.S. mails, first class, postage prepaid.

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