

ORIGINAL

RELATED CORRESPONDENCE

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'83 OCT 17 A11:55

OFFICE OF SECRETARY
FOR LITIGATION
WASHINGTON, D.C.

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 Nos. 50-275
50-323

(Reopened Hearing --
Design Quality
Assurance)

LICENSEE PACIFIC GAS AND ELECTRIC COMPANY'S
SECOND SUPPLEMENTAL RESPONSE TO
GOVERNOR DEUKMEJIAN'S THIRD SET OF INTERROGATORIES

RESPONSE TO INTERROGATORY 2:

Additional witness: E. Connell, III

RESPONSE TO INTERROGATORY 61:

1. E. Connell, III

(a) Yes

(b) Contention 9

(c) See attached qualifications of E. Connell, III

(d) None

(e) To be provided during the testimony

1	(f)	None	
2	(g)	i)	N/A
3		ii)	N/A
4		iii)	N/A
5		iv)	N/A
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1 PROFESSIONAL QUALIFICATIONS OF EDWARD C. CONNELL, III

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3 EDUCATION: B. S. Nuclear Engineering, University of
4 Lowell, 1972

5 M. S. Nuclear Engineering, Purdue University,
6 1974. Teaching Fellow - Nuclear Engineering -
7 Thesis, Space Energy Synthesis for Fast Spectra

8 EXPERIENCE: 1982 - Present - Mechanical Group Supervisor
9 assigned to the Diablo Canyon Project.
10 Responsible for technical content and
11 direction, cost and schedule, and
12 administration for project mechanical and
13 nuclear design.

14 1978 - 1982 - Bechtel Power Corporation,
15 assigned to the Susquehanna Project. Succes-
16 sive assignments of increasing responsibility
17 as:

18 A. Systems Engineer - Overall design responsi-
19 bility for a number of systems, e.g., RHR,
20 CS, MSIV-LCS. Performed design
21 calculations and procured equipment.

22 B. Project Licensing Engineer - Responsible
23 for all licensing activities for all
24 disciplines, including preparation of FSAR,
25 ER, and Technical Specifications. Assured
26 all regulatory requirements were addressed
27 in the Bechtel design. Responded to NRC
28 questions and represented the project in
29 meetings with NRC and hearings before ACRS.

30 C. Nuclear Group Leader - Technical direction
31 and personnel actions for 16 engineers.
32 Overall responsibility for development of
33 design, procurement of equipment, and
34 interface with client, start-up and
35 suppliers. Group responsibilities included
36 radwaste systems design, shielding, NSSS
37 interface, environmental and hazards
38 studies, and licensing.

39 D. Deputy Mechanical Group Supervisor - Assist
40 Group Supervisor and act in his absence.
41 Group of 45 engineers responsible for
42 nuclear, balance of plant, HVAC and

plumbing design. Responsible for developing yearly budget and scheduling major work activities. Mechanical coordinator for Mark II seismic hydrodynamic loads program. Review and sign-off on all drawings. Trouble shoot and resolve special problems.

1974-1978 - Flour Pioneer Inc. - Worked in Standard Balance of Plant design for Westinghouse and B & W standard plants. Prepared SAR, coordinated with NSSS supplier, designed NSSS mechanical support facilities, performed shielding and done calcs, met with NRC and ACRS. As Project Regulatory Engineer, coordinated all licensing activities and worked on design for nuclear and mechanical systems for follow-on engineering for Kewaunee and Prairie Island plants after start-up. Senior Project Nuclear Engineer for a systems interaction study for Zion, responsible for review of LER's from all plants, comparison with Zion design and made recommendations for hardware and operational changes. Lead engineer in charge of a study to quantify the hazards and assess the feasibility of siting gas turbines at Rancho Seco.

1972-1974 - Purdue University - Teaching Fellow
for Nuclear Engineering courses. Research in
computational methods for solving core physics
problems for Liquid Metal Breeder Reactor.

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1 RESPONSE TO INTERROGATORY 61:

2 2. E. J. Kreh, Jr. (Previously designated in response
3 to Interrogatory 2(d) on
4 September 19, 1983.)

5 (a) Yes

6 (b) Nuclear plant quality assurance

7 (c) See attached qualifications of E. J. Kreh, Jr.

8 (d) Co-authored the ANSI/ASME NQA-1, "Quality
9 Assurance Program Requirements for Nuclear Power
10 Plants" 1979 and 1983 versions, as a member of the
11 main committee.

12 (e) If any, to be provided during testimony.

13 (f) None

14 (g) N/A

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1 PROFESSIONAL QUALIFICATION

2 OF

3 EDWARD J. KREH, JR.

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5 My name is Edward Kreh. I am a Senior Consulting Engineer
6 with SMC O'Connell and Associates in Pittsburgh, PA. I am a
7 graduate of Carnegie Institute of Technology, now Carnegie
8 Mellon University of Pittsburgh, PA and hold a Bachelor's
9 Degree in Mechanical Engineering. I have been active in the
10 Nuclear Industry since January of 1951.

11
12 Since my retirement in 1979, following over 33 years of
13 service with Westinghouse, I have been consulting in the
14 Nuclear Industry. The scope of my most recent involvement
15 has included Management Evaluation, Product Assurance
16 Program Evaluation, Product Assurance Auditing, Training and
17 Design Review activities.

18
19 I am a registered Professional Engineer and an active member
20 of the ASME. In that capacity, I am a member of the ASME
21 Committee on Nuclear Quality Assurance, which is responsible
22 for ANSI/ASME/NQA-1 Standards. Also, I am a member of the
23 Executive Committee, as well as Chairman of the Design and
24 Procurement Subcommittee supporting the development of the
25 NQA-1 Standard for nuclear facilities.

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1 Before my retirement from Westinghouse, I was Manager,
2 Product Assurance for the Westinghouse Pressurized Water
3 Reactor Systems Division from 1972 to 1979.

4
5 Prior to 1972, I had various responsibilities at the Bettis
6 Atomic Power Laboratory, including, Manager of Bettis Atomic
7 Laboratory Operations; Manager, Nuclear Fuel and Plant
8 Material Development; Manager, Nuclear Fuel Development and
9 Quality Control. These were all assignments on the General
10 Manager's staff.

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1 RESPONSE TO INTERROGATORY 61:

2 2. R. A. Wieseemann (Previously designated in response
3 to Interrogatory 2(d) on
4 September 19, 1983.)

5 (a) Yes

6 (b) Contention 6

7 (c) See attached qualifications of R. A. Wieseemann

8 (d) None

9 (e) If any, to be provided during testimony.

10 (f) and (g) Records have not been maintained. How-
11 ever, witness has testified at numerous
12 proceedings dating back to 1963. It
13 would require a tremendous effort to
14 review the records of all such proceed-
15 ings involving Westinghouse-supplied
16 NSSS plants; this information is a
17 matter of public record.

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1 PROFESSIONAL QUALIFICATION

2 OF

3 ROBERT A. WEISEMANN

4
5 My name is Robert A. Weisemann. My business address is P.O.
6 Box 355, Pittsburgh, Pennsylvania 15230. I am employed by
7 Westinghouse Electric Corporation as Manager of Regulatory
8 and Legislative Affairs in the Nuclear Safety Department of
9 the Nuclear Technology Division (NTD). I have served in
10 this capacity since August, 1978 and, in this capacity, I am
11 one of the individuals responsible for reviewing the safety
12 of design, construction and operation in connection with
13 licensing nuclear power generating plants being designed and
14 built by Westinghouse; Secretary of the WRD Safety Review
15 Committee; and responsible for directing the Westinghouse
16 participation in public hearings.

17
18 I was graduated from Case Institute of Technology in 1949
19 with a B.S. degree in Mechanical Engineering having majored
20 in Heat-Power and completed advanced studies in Mathematics,
21 Gas Dynamics and Heat Transfer and Business Administration
22 at the University of Pennsylvania and the University of
23 Missouri. I was graduated from Duquesne University School
24 of Law in 1982 with a J.D. degree and am currently an active
25 member of the Pennsylvania Bar.

26 ///

1 I have a total of over 34 years of engineering experience
2 with the Westinghouse Electric Corporation. The 28 years
3 prior to being assigned to my present position were spent in
4 the field of nuclear engineering as applied to reactor
5 systems for generation of electricity. The last 25 of these
6 28 years were devoted to nuclear safety; establishing safety
7 criteria and standards; directing safety assessments of
8 design, construction and operation of nuclear plants and
9 preparation of safety analysis reports and testimony for
10 public hearings in support of applications for construction
11 permits and operating licenses for nuclear plants.

12
13 I am a registered professional engineer in the Commonwealth
14 of Pennsylvania, a member of the American Nuclear Society,
15 and a member of the American Bar Association. I am also an
16 associate member of Sigma XI.

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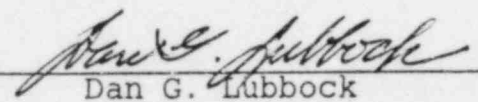
Respectfully submitted,

ROBERT OHLBACH
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Attorneys for
Pacific Gas and Electric Company

By 
Dan G. Lubbock

DATED: October 14, 1983.

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UNITED STATES OF AMERICA

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NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
PACIFIC GAS AND ELECTRIC COMPANY)	Docket Nos. 50-275
(Diablo Canyon Nuclear Power)	50-323
Plant, Units No. 1 and 2))	(Reopened Hearing --
)	Design Quality
)	Assurance)

CERTIFICATION

I, Dan G. Lubbock, hereby certify:

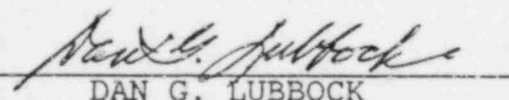
1. I am one of the attorneys for Licensee Pacific Gas and Electric Company in the above-entitled matter and, as such, am authorized to execute this certification.

2. I have read the foregoing Second Supplemental Response to Governor Deukmejian's Third Set of Interrogatories, and know the contents thereof.

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

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

Executed at San Francisco, California, on October 14, 1983.


DAN G. LUBBOCK

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

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

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

The foregoing document(s) of Pacific Gas and Electric Company has (have) been served today on the following by deposit in the United States mail, properly stamped and addressed:

Judge John F. Wolf
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US Nuclear Regulatory Commission
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*Sent by Express Mail

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Attn: Docketing and Service
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*Judge W. Reed Johnson
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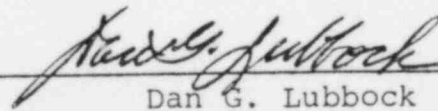
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Date: October 14, 1983

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Dan G. Lubbock