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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

'93 FEB -5 P3:59

Before Administrative Judges:

Charles Bechoefer, Chairman  
Dr. Jerry R. Kline  
Frederick J. Shon

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of

PACIFIC GAS AND ELECTRIC COMPANY  
(Diablo Canyon Nuclear Power  
Plant, Units 1 and 2)

Facility Operating Licenses  
No. DPR-80 and DPR-82

Docket Nos. 50-275-OLA-2  
50-323-OLA-2

ASLBP No. 92-669-03-OLA-2

(Construction Period  
Recovery)

February 3, 1993

Intervenor San Luis Obispo Mothers for Peace  
Request to Pacific Gas and Electric Company  
for Entry Upon the Diablo Canyon Nuclear  
Power Plant, Units 1 and 2, Pursuant to  
10 CFR 2.741(a)(2) for the Purposes of  
Inspection, Measuring, and Photographing,  
for Observation of Interim Fire-Protection  
Measures and Maintenance and Surveillance  
Activities, and for Other Activities as  
Authorized in the Provisions of 10 CFR 2.741(a)(2)

Pursuant to 10 CFR 2.741(a)(2), San Luis Obispo Mothers for Peace ("MFP") hereby requests Pacific Gas and Electric ("PG&E") to permit entry to the Diablo Canyon Nuclear Power Plant, Units 1 and 2, ("the plant") for the purpose of inspection, measuring, photographing various areas within the plant, for observation of activities associated with interim fire-protection measures adopted by PG&E in lieu of fire barriers fully complying with U.S. Nuclear Regulatory Commission ("NRC") regulations, for observation of maintenance and surveillance activities, and for other such activities as are authorized under the provisions of 10 CFR 2.741(a)(2). MFP fully recognizes the paramount importance of safe operations at the plant, and will work with PG&E

under the guidance of the Atomic Safety and Licensing Board and with such advice as the NRC staff may wish to furnish so as to minimize the impact on plant operations of the proposed discovery activity.

Consistent with the discovery schedule for this proceeding, which has yet to be established, and consistent to the extent practicable with the planned operations at the plant, MFP proposes to send its expert consultants (MHB Technical Associates) and a representative of MFP to the plant at a time to be mutually agreed upon by MFP and PG&E (or, if no such agreement can be reached, at a time specified by Order of the Board) to conduct discovery in connection with the two contentions admitted into this proceeding by Board Order dated January 21, 1993. MFP's consultants have conducted such discovery in previous NRC proceedings, and have similar experience before other administrative agencies (such as state utility regulatory commissions), and have passed utility-administered radiation work permit/health physics training on a number of occasions. In addition, MFP's consultants have previously been to the plant and have a general familiarity the plant design and its operational characteristics, but have not previously had an opportunity to evaluate the specific matters within the scope of the admitted contentions.

It should be noted that pursuant to 10 CFR 2.741(d), a response from PG&E to this request is required to be served within 30 days after service of the request.

#### Contention V (Thermo-Lag Fire Barrier Interim Fire-Protection Measures)

Conceivably, within the scope of Contention V MFP could request to perform this discovery for each and every fire barrier containing Thermo-Lag material at the plant. MFP recognizes, however, that such a program of inspection and other activities permitted under the provisions of 10 CFR 2.741(a)(2) would be time-consuming (both for MFP and its consultants, as well as for PG&E) and could potentially interfere with operational activities. Accordingly, MFP (together with its consultants) proposes to meet with PG&E to mutually agree upon a set of systems and plant areas for inspection (including consideration of fire barriers which protect the

system or area, including the system's or area's power, control, and instrumentation cables) will be the subject of the proposed discovery. Pending such discussions, MFP suggests for initial consideration the following systems and plant areas: (a) Fire Area 5-A-4, Unit 1 480 volt A.C. switchgear room; (b) Fire Area 5-B-4, Unit 2 480 volt A.C. switchgear room; (c) Fire Area 30-A-5, Units 1 and 2 intake structure (if this structure contains the Auxiliary Salt Water system pumps and related components); (d) Fire Area 10, Unit 1 12 kV A.C. switchgear room; and (e) Fire Area 20, Unit 2 12 kV A.C. switchgear room. It should be noted that as a result of power, control, and/or instrumentation cabling, it may be necessary to add to the areas to be inspected those cable chases, corridors, etc., associated with the systems and areas, and it is also possible that the control room (and other areas where fire alarms for the above-identified plant areas are annunciated and displayed) may need to be examined. In addition, to the extent that fire or combustion products, and fire-fighting media (water spray, carbon dioxide, foam, etc.) could communicate with adjacent areas through failed Thermo-Lag barriers, the adjacent areas would also be subject to similar inspection.

Regarding these areas (or other such areas as may be mutually agreed upon by MFP and PG&E, or as may be specified by the Board in the event of no such mutual agreement), MFP and its consultants plan to inspect the areas (noting such matters as layout, equipment location, fire barrier location and geometry, cable routing both in the area and in adjacent areas, and potential sources of combustible materials), measure distances between equipment and/or cables and the fire barriers, and take notes and color photographs to document the findings of the inspection and measurements.

MFP recognizes that such photography could potentially pose a problem due to concerns over plant security matters, although it has been the experience of MFP's consultants in the past that there are usually few such problems. Considering the areas currently under consideration for detailed evaluation, MFP does not believe that security concerns will be an important issue.

Absent such concerns, MFP proposes that its consultants will take the necessary photographs,

have them processed commercially, and provide prints of all of the photographs to PG&E (and to the NRC staff, should the staff want copies).

In addition, to the extent that PG&E is relying on hourly and/or continuous fire watches as part of its interim fire-protection measures, MFP and its consultants propose to accompany personnel performing these roving fire watches to observe the conduct of the fire watches, and to ask questions of the personnel performing the fire watches concerning the conduct of their work (such questioning not to be done while the personnel are performing their work).

MFP wishes to negotiate as much as possible of this discovery process with PG&E so as to reach a mutual understanding as to the timing, scope, and conduct of the discovery, to the extent that this is practicable under the constraints of this proceeding and under the constraints related to PG&E's need to operate the plant. To that end, MFP and its consultants are prepared to meet with PG&E counsel and technical staff to discuss this discovery request. MFP also wishes to cooperate with the NRC staff, to the extent that the staff has an interest, and MFP and its consultants are similarly prepared to meet in California with the NRC staff (including, as appropriate, resident inspectors and regional inspection staff) concerning the proposed discovery.

#### Contention I (Maintenance and Surveillance Program)

MFP also requests the opportunity to inspect the maintenance and surveillance program and its implementation at Diablo Canyon. To accomplish this it will be necessary to do more than merely inspecting the paper associated with the program. The MFP and its Consultants will require a minimum of one day and not more than two days at the site. During this time we will request to see the records and files associated with the maintenance of a small number of safety related or important to safety items (not to exceed 3 items) which we will select at random. The items will be identified to PG&E prior to our visit.

MFP will wish to see the maintenance log for the equipment identified and the surveillance log (if applicable). We will also wish to interview one or more of the maintenance personnel who

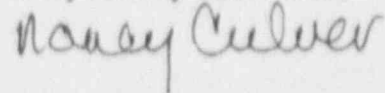
are responsible for the type of equipment being reviewed. These interviews will be informal and will not exceed 2 hours for any one individual.

MFP will also expect to see the current scheduling and logging process of maintenance and surveillance activities. To the extent that it is applicable we will request copies of sample documentation applicable to area being reviewed.

We would like to observe a typical maintenance activity of a safety related component that can be accommodated in a low radioactivity environment (i.e. we do not wish to delay any activity by attempting to obtain access to an area requiring us to suit up). Similarly we will not request access to any area which would impair or in any way interfere with operation of the plant.

It is possible that photographs will be required, and a camera will be brought along for that purpose. Copies of any photos taken will be provided to PG&E once they are developed. Of course we will abide by the plant rules regarding safety and ALARA and security.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Nancy Culver".

San Luis Obispo Mothers  
for Peace



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**Certificate of Service**

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I hereby certify that copies of the foregoing Intervenor San Luis Obispo Mothers for Peace Request to PG&E for Entry Upon the Diablo Canyon Nuclear Power Plant have been served upon the following persons by U.S. mail, first class, or by overnight express mail.

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Adjudication  
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Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
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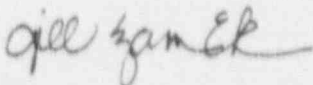
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Dated February 1, 1993, San Luis Obispo County, CA



Jill ZamEk