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UNITED STATES OF AMERICA '93 JUL -6 P5 20
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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

July 1, 1993

**Intervenor San Luis Obispo Mothers for Peace
Motion to Compel Pacific Gas and Electric Company
to Respond to the Third Set of Supplemental Interrogatories and
Requests for the Production of Documents
Filed by San Luis Obispo Mothers for Peace**

On June 4, 1993, the San Luis Obispo Mothers for Peace ("SLOMFP") filed its Third Set of Supplemental Interrogatories and Requests for the Production of Documents to Pacific Gas and Electric Company ("PG&E"). PG&E responded to SLOMFP supplemental interrogatories in PG&E's Response to Third Set of Supplemental Interrogatories and Requests for the Production of Documents [aging] Filed by SLOMFP (June 18, 1993).

For reasons provided below, some of PG&E's answers to SLOMFP inquiries and requests for production of documents are inadequate and incomplete. Pursuant to 10 CFR 2.740(f) and 2.740(e)(3), SLOMFP moves that the Atomic Safety and Licensing Board enter an Order compelling PG&E to answer certain of SLOMFP interrogatories.

Interrogatory 1b: In this request, SLOMFP asks PG&E to provide the equipment qualification ("EQ") files for the components listed (check valves, Limitorque valve operators, cables with bonded Hypalon jackets and cables listed in Attachment 1 to IN 93-33). PG&E objects to this interrogatory because it relates to the environmental qualification of equipment, not to the maintenance of already qualified equipment. SLOMFP disagrees; SLOMFP is not questioning if the equipment is qualified to EQ specifications. SLOMFP is questioning whether or not the equipment has

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been maintained within the boundaries of its environmental qualifications. This is a maintenance issue, and the only way to make this determination is to look at the specifications in the EQ files and compare them to the actual conditions to which the equipment is being subjected.

Interrogatory 2: A portion of this interrogatory requested (i) the results of temperature measurements in the containment and (ii) the results of any comparison between these temperature measurements and environmental qualification specifications for important-to-safety equipment. PG&E did not respond to those requests. If PG&E does not have that information, it should state that.

Interrogatory 6: In this interrogatory, SLOMFP requests information regarding PG&E's methods for measuring radiation exposure to important-to-safety equipment in containment. SLOMFP further asks for (i) the results of these measurements and (ii) the results of any comparison between these measurements and EQ specifications. PG&E's response to this interrogatory is simply that "qualification margins are sufficient to assure that all EQ radiation qualification doses exceed any possible plant does during normal operations by a large margin." This response is inadequate. If PG&E does not measure radiation exposure to important-to-safety equipment in containment, PG&E should say so.

Respectfully Submitted,

Nancy Culver

Nancy Culver, President
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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 Motion to Compel Pacific Gas and Electric Company to Respond to the Third Set of Supplemental Interrogatories and Requests for the Production of Documents Filed by San Luis Obispo Mothers for Peace and Intervenor San Luis Obispo Mothers for Peace Response to Prehearing Conference Order Re: INPO Documents have been served upon the following persons by U.S. mail, first class.

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Dated July 1, 1993, San Luis Obispo County, CA