

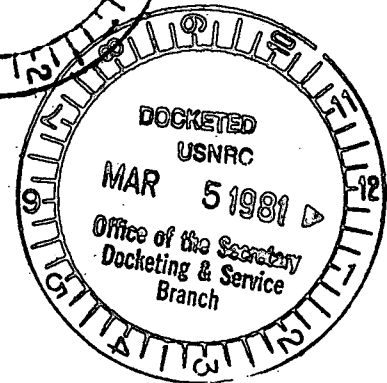
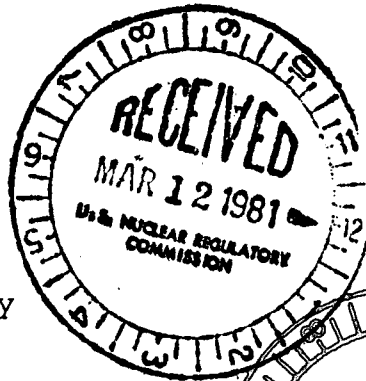
COPY

RELATED CORRESPONDENCE

DAVID R. PIGOTT  
SAMUEL B. CASEY  
JOHN A. MENDEZ  
CHICKERING & GREGORY  
Three Embarcadero Center  
San Francisco, California 94111  
Telephone: (415) 393-9000

CHARLES R. KOCHER  
JAMES A. BEOLETTO  
Southern California Edison Company  
P. O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, California 91770  
Telephone: (213) 572-1900

Attorneys for Applicants  
Southern California Edison Company  
and San Diego Gas & Electric Company



UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

3/2/81

In the Matter of )  
 )  
SOUTHERN CALIFORNIA )  
EDISON COMPANY, et al., )  
(San Onofre Nuclear Generat- )  
ing Station, Units 2 and 3). )  
\_\_\_\_\_ )

Docket Nos. 50-361 OL  
50-362 OL

THIRD SET OF INTERROGATORIES AND  
FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO INTERVENOR GROUPS  
UNITED AGAINST RADIATION  
DANGER (GUARD)

TO: INTERVENORS GROUPS UNITED AGAINST RADIATION DANGER (GUARD):

Applicants in the above-entitled action hereby request that you answer the following set of interrogatories under oath, by an officer or authorized agent, within fourteen (14) days of service hereof, pursuant to Title 10, Part 2, Section 2.740b of the Code of Federal Regulations. Applicants further request that you make available for inspection and copying the documents

8103130448

G

DS03  
50/1

specified below pursuant to Title 10, Part 2, Section 2.741 of the Code of Federal Regulations.

INSTRUCTIONS AND DEFINITIONS

For purposes of these Interrogatories and your responses thereto, as well as the Request for Production of Documents, the following definitions and instructions shall apply:

(a) The terms "GUARD", "you," or "your" refers jointly to the intervenor responding to these Interrogatories: namely, Groups United Against Radiation Danger.

(b) The term "Applicants" refers jointly to the proponents of these Interrogatories, Southern California Edison Company and the San Diego Gas & Electric Company.

(c) The term "Intervenors" refers jointly to GUARD and intervenors Friends of the Earth, Mrs. and Mrs. August Carstens, Mr. and Mrs. Lloyd Von Haden, Mr. Donald May, and Mrs. Donis Davey, as well as their respective members and agents.

(d) The term "person" means any natural person and any private or public entity of any nature, including without limitation, corporations, firms, partnerships, sole proprietorships, associations, groups, organizations, trusts and estates.

(e) The terms "document" or "documents" mean: the original, or if the original is not in your custody or under your control, then a copy of any written, printed, recorded, or graphic matter, photographic matter, or sound reproductions, however produced or reproduced.

(f) The term "communication" refers to any contact, oral or documentary, formal or informal, at any time or place or

under any circumstances whatsoever, whereby information of any nature was transmitted or transferred.

(g) As used herein, unless the context otherwise requires, the singular number includes the plural and the plural includes the singular; the masculine gender includes the feminine, and the feminine includes the masculine.

(h) When you are requested to "identify" any document you shall include in your response a description sufficient to satisfy the "reasonable particularity" requirement found in Title 10, Part 2, Section 2.741(c) of the Code of Federal Regulations, including without limitation the following information with respect thereto:

- (1) The nature of the document;
- (2) Its date;
- (3) The names of its addressor(s) and addressee(s), if any;
- (4) The name(s) of the person(s) who prepared it;
- (5) The name(s) and address(es) of the present custodian(s) of the original and any copies thereof; and
- (6) A summary of its contents.

In lieu of providing the information specified in Paragraph (h), Items (1)-(6), you may attach to your responses to these Interrogatories a true copy of such document, identifying the Interrogatory to which it is responsive and stating in your answer only such of the information specified in Paragraph (h), Items (1)-(6) as does not clearly appear on the face of such document.

If you claim a document is privileged or attorneys' work product, describe the same generally and state all facts

upon which you base the claim of privilege or the claim such document constitutes attorneys' work product.

(i) When you are requested to "identify" any person, you shall set forth the full name and last known business address, residence address, and employer of such person you are asked to identify.

(j) When you are requested to "identify" an "event" or a "communication" you shall include in your response a description sufficient to satisfy the "reasonable particularity" requirement found in Title 10, Part 2, Section 2.741(c) of the Code of Federal Regulations, including without limitation the following information with respect thereto:

(1) The general nature and description of the event or communication;

(2) The time of the event or communication;

(3) The place of the event or communication;

(4) Persons involved in the event or communication; and

(5) Available documentation of the event or the communication.

(k) The term "expert" refers to a person who by virtue of his knowledge, skill, experience, training or education has acquired a scientific, technical or specialized knowledge which can assist the Nuclear Regulatory Commission Atomic Safety and Licensing Board in understanding the evidence or determining a fact, opinion, or scientific theory relevant to an issue in this proceeding.

(l) When you are requested to "identify" an "expert" as that latter term is defined in Paragraph (k) above, you shall set forth the full name and last known business address, residence address, academic affiliations, and present employer of each such "expert" you are asked to identify.

(m) In answering these Interrogatories, you shall furnish all information available to you, your respective agents, employees, investigators, representatives and attorneys, and not merely such information as is known from personal knowledge.

(n) The term "SONGS 2 and 3" refers to the San Onofre Nuclear Generating Station, Units 2 and 3.

(o) The term "NRC" refers to the United States Nuclear Regulatory Commission; the term "ASLB" refers to the NRC's Atomic Safety and Licensing Board before whom contentions in this proceeding, not otherwise withdrawn, are to be adjudicated.

(p) Where these Interrogatories ask whether you have "analyzed" or intend to "analyze" a document or subject, Applicants define "analyze" to be where you or your consultants have reviewed the document or subject in the context of SONGS 2 and 3 and have produced or intend to produce a written report of that review.

(q) The term "San Clemente Plan" refers to the "City of San Clemente, Radiological Emergency Response Plan Annex to the City's Emergency Operations Plan", adopted on February 18, 1981, and served on all parties hereto on February 23, 1981.

(r) The terms "offsite assistance agency" or "offsite assistance agencies" refers generally to any or all federal, State, and local governmental agencies with jurisdiction to

respond in any manner in the event of a radiological emergency at SONGS 2 and 3.

(s) The term "Federal Requirements" refers to the current NRC emergency planning regulations set forth in 10 C.F.R. §§ 50.33, 50.47, 50.54(q)(r)(s)(t) and (u); and 10 C.F.R., Part 50, Appendix E.

I.

INTERROGATORIES

INTERROGATORY NO. 1:

Do you contend that the San Clemente Plan does not adequately comply with the Federal Requirements? If so,

(a) Specify each and every section and subsection of the Federal Requirements with which you contend the San Clemente Plan does not comply and briefly state the reason why you believe that the San Clemente Plan does not comply with the section and subsection of the Federal Requirements so specified;

(b) State each and every fact upon which you base this contention;

(c) Identify each and every document upon which you base this contention;

(d) Identify each and every event or communication upon which you base this contention;

(e) Identify each and every person with knowledge of the factual basis or bases of this contention, or on whose writing, opinions, or prior testimony you base this contention;

(f) Identify each and every person whom you expect to call as a witness, expert or otherwise, at the hearing before the

ASLB with respect to the San Clemente Plan and, as to each witness so identified, please provide the following information:

(1) State the precise subject matter on which the witness is expected to testify;

(2) State the substance of the facts and opinions to which the witness is expected to testify; and

(3) Summarize the factual and theoretical bases as well as any other grounds, for each opinion to which the witness is expected to testify.

INTERROGATORY NO. 2:

Have you analyzed or do you intend to analyze the San Clemente Plan? If so,

(a) Identify when such analysis was performed or is expected to be performed;

(b) Identify each and every person who has performed or who is to perform such an analysis;

(c) State whether each such analysis will be voluntarily provided to Applicants without further motion to compel; and

(d) Identify each and every document or communication wherein such analysis may be found or is referenced.

INTERROGATORY NO. 3:

Have you discussed the San Clemente Plan with representatives or employees of the City of San Clemente, or representatives or employees of any other offsite assistance agency? If so,

(a) Identify each and every person or persons with whom you discussed the plan and the approximate date of each such discussion; and

(b) Identify all documents or communications pertaining to your discussion of the plan with each person identified in subparagraph (a) immediately above.

II.

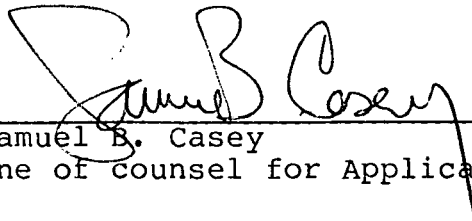
REQUEST FOR PRODUCTION OF DOCUMENTS.

Pursuant to 10 C.F.R. § 2.741, the Applicants request GUARD to make available for inspection and copying at a mutually agreeable time and place all documents which you identified in response to these interrogatories.

DATED: March 2, 1981.

DAVID R. PIGOTT  
SAMUEL B. CASEY  
JOHN A. MENDEZ  
CHICKERING & GREGORY

CHARLES R. KOCHER  
JAMES A. BEOLETT  
SOUTHERN CALIFORNIA EDISON COMPANY

By   
Samuel B. Casey  
One of counsel for Applicants



CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of March, 1981, a copy of the THIRD SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO INTERVENOR GUARDS UNITED AGAINST RADIATION DANGER (GUARD) was served upon each of the following by depositing in the United States mail, first-class, postage prepaid, addressed as follows:

Ivan W. Smith, Esq., Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Cadet H. Hand, Jr.  
Director, Bodega Marine Laboratory  
University of California  
P. O. Box 247  
Bodega Bay, California 94923

Dr. Emmett A. Luebke  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

David W. Gilman  
Robert G. Lacy  
San Diego Gas & Electric Company  
P. O. Box 1831  
San Diego, California 92112

Robert Dietch, Vice President  
Southern California Edison Company  
P. O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, California 91770

James F. Davis,  
State Geologist  
Division of Mines and Geology  
1416 Ninth Street, Room 1341  
Sacramento, California 95814

Alan R. Watts, Esq.  
Rourke & Woodruff  
California First Bank Building  
10555 North Main Street  
Santa Ana, California 92701

Lawrence J. Chandler, Esq.  
Office of the Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Janice E. Kerr, Esq.  
J. Calvin Simpson, Esq.  
Lawrence Q. Garcia, Esq.  
California Public Utilities Commission  
5066 State Building  
San Francisco, California 94102

Mr. Lloyd von Haden  
2089 Foothill Drive  
Vista, California 92083

Mrs. Lyn Harris Hicks  
G U A R D  
3908 Calle Ariana  
San Clemente, California 92801

Phyllis M. Gallagher, Esq.  
1695 W. Crescent Avenue, Suite 222  
Anaheim, California 92801

Richard J. Wharton, Esq.  
University of San Diego  
School of Law  
Alcala Park  
San Diego, California 92110

August S. Carstens  
2071 Caminito Circulo Norte  
La Jolla, California 92037

Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



---

SAMUEL B. CASEY  
One of Counsel for Applicants  
SOUTHERN CALIFORNIA EDISON COMPANY  
and SAN DIEGO GAS & ELECTRIC COMPANY