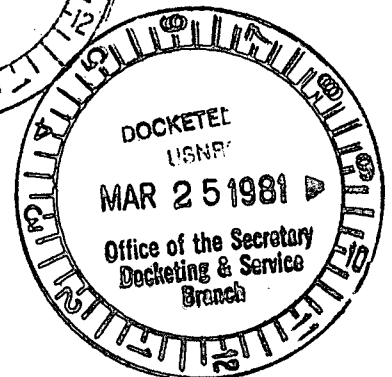
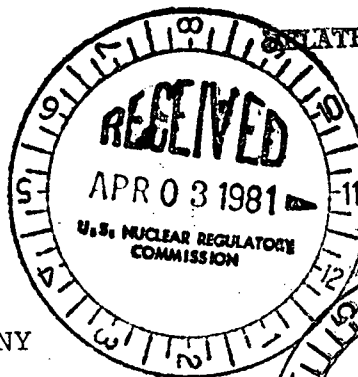


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UNITED STATES OF AMERICA

Mar 19, 1981

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
SOUTHERN CALIFORNIA EDISON COMPANY,)
et al.,)
(San Onofre Nuclear Generating)
Station, Units 2 and 3).)

Docket Nos. 50-361 OL
50-362 OL

MOTION TO COMPEL ANSWERS
TO APPLICANTS' FOURTH SET
OF INTERROGATORIES TO
FOE, ET AL.

TO: THE ATOMIC SAFETY AND LICENSING BOARD, THE PARTIES, AND
THEIR COUNSEL OF RECORD HEREIN:

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO
GAS & ELECTRIC COMPANY ("Applicants") hereby move the Atomic
Safety and Licensing Board for an Order pursuant to 10
C.F.R. § 2.740(f) compelling Intervenor, Friends of the
Earth ("FOE"), et al. to answer Applicants' Fourth Set of
Interrogatories to Intervenor, FOE, et al., served by
Applicants on February 17, 1981.

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1 The grounds for this motion, which are more fully
2 set forth in the accompanying "Memorandum of Points and
3 Authorities in Support of Motion to Compel Answers to Applicants'
4 Fourth Set of Interrogatories to FOE, et al." are that
5 Intervenor have failed to serve a copy of their answers and
6 objections upon all parties to the proceeding within fourteen
7 (14) days after service of the interrogatories as required
8 by 10 C.F.R. §2.740b(b).

9 This motion is based on this "Motion to Compel
10 Answers to Applicants' Fourth Set of Interrogatories to FOE,
11 et al.", the accompanying "Memorandum of Points and Authorities
12 in Support of Motion to Compel Answers to Applicants' Fourth
13 Set of Interrogatories to FOE, et al." and the proposed
14 "Order Compelling Answers to Applicants' Fourth Set of
15 Interrogatories to FOE, et al.", the record in the above-
16 captioned proceeding, and any and all such further oral
17 arguments or documentary evidence which may come before this
18 Board.

19 Dated: March 19, 1981.

20 DAVID R. PIGOTT
21 SAMUEL B. CASEY
22 JOHN A. MENDEZ
23 CHICKERING & GREGORY

24 CHARLES KOCHER
25 JAMES BEOLETT
26 SOUTHERN CALIFORNIA EDISON COMPANY

27 By John A. Mendez
28 John A. Mendez
 One of Counsel for Applicants
 Southern California Edison Company
 and San Diego Gas & Electric Co.