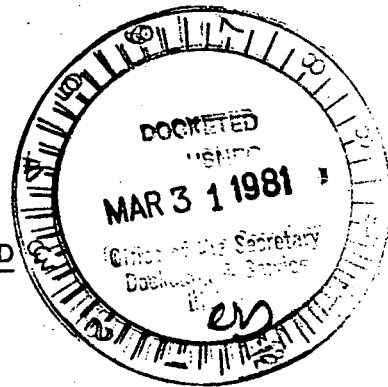


RELATED CORRESPONDENCE

3-25-81

UNITED STATES OF AMERICA  
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)

50-361  
MOTION TO COMPEL FURTHER  
ANSWERS TO INTERROGATORIES

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

FRIENDS OF THE EARTH (and A.S. Carstens) ("Intervenors") hereby  
move the Atomic Safety and Licensing Board for an Order pursuant  
to 10 C.F.R. § 2.740(f) compelling Southern California Edison,  
et al. ("Applicants"), to answer further, Intervenors "Sixth Set  
of Interrogatories to Southern California Edison, et al.," served  
on Applicants February 19, 1981.

The grounds for this motion, which are more fully set forth  
in the accompanying "Memorandum of Points and Authorities In  
Support of Motion to Compel Further Answers to Interrogatories",  
are that Applicants have failed or have responded evasively or  
incompletely to the following interrogatories served by Intervenors  
F.O.E., et al. on February 19, 1981: Numbers 1, 2, 3, 4, 5, 6, 7,  
8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24,  
25, 26, 27, 28, 29, 30, 35, 43, 45, 64, 65, 66, 67, 68, 69, 71, 73,  
77, 78, 81, 82, 85, 86, 87, 93, 98, 99, 100, 103, 104, 109, 111,  
117, 122, and 123.

This motion is based on this "Motion to Compel Further Answers  
to Interrogatories", the accompanying "Memorandum of Points and  
Authorities In Support of Motion to Compel Further Answers to

G

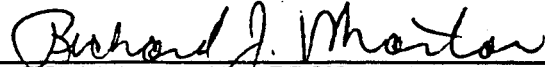
8104070425

DS03  
50/1

Interrogatories" and the proposed "Order Compelling Further Answers to Interrogatories", the record in the above-captioned proceeding, and any and all such further oral arguments or documentary evidence as may come before the Board.

DATED: March 25, 1981

Respectfully submitted,



RICHARD J. WHARTON  
Attorney for Intervenor,  
F.O.E., ET AL.  
USD ENVIRONMENTAL LAW CLINIC