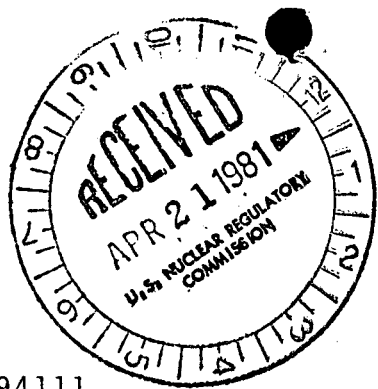
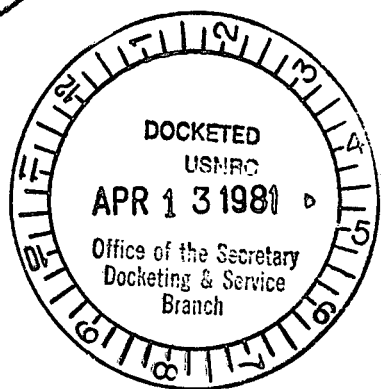


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	Docket Nos. 50-361 OL
SOUTHERN CALIFORNIA EDISON)	50-362 OL
COMPANY, et al.,)	
)	MOTION OF SOUTHERN
(San Onofre Nuclear Generating)	CALIFORNIA EDISON COMPANY
Station, Units 2 and 3).)	AND SAN DIEGO GAS & ELECTRIC
)	COMPANY FOR PROTECTIVE ORDER
)	IN RESPONSE TO FOE, <u>et al.</u> 's
)	MOTION TO COMPEL FURTHER
)	ANSWERS TO INTERROGATORIES.

SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY ("Applicants") pursuant to 10 C.F.R. § 2.730(c) hereby respond to FOE, et al.'s Motion to Compel Further Answers to Interrogatories, served herein on March 15, 1981 and move the Atomic Safety and Licensing Board for a Protective Order pursuant to 10 C.F.R. §§ 2.740(c) and (f)(2) directing that no further discovery be had on Interrogatory Nos. 1 through 30, 35, 43, 45,

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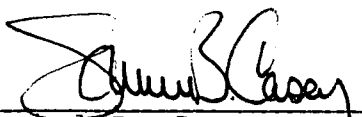
1 64-69, 71, 73, 77, 78, 81, 82, 85 through 87, 93, 98 through 100,
2 103, 104, 109, 111, 117, 122 and 123 of "Intervenors F.O.E. ET
3 AL. Sixth Set of Interrogatories to Southern California Edison"
4 on file herein.

5 This motion is based on itself, the accompanying
6 "Memorandum of Points and Authorities of Southern California
7 Edison Company and San Diego Gas & Electric Company in Support of
8 Motion for Protective Order in Response to FOE et al.'s Motion to
9 Compel Further Answers to Interrogatories", the accompanying
10 proposed "Protective Order" in support of this motion, the record
11 in the above-captioned proceeding, and any and all such further
12 oral arguments or documentary evidence as may come before the
13 Board.

14 DATED: April 9, 1981

15 DAVID R. PIGOTT
16 SAMUEL B. CASEY
17 JOHN A. MENDEZ
18 CHICKERING & GREGORY

18 CHARLES R. KOCHER
19 JAMES A. BEOLETT
20 SOUTHERN CALIFORNIA EDISON COMPANY

21 By 
22 Samuel B. Casey
23 One of Counsel for Applicants
24 Southern California Edison
25 Company and San Diego Gas &
26 Electric Company
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