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19 UNITED STATES OF AMERICA

20 NUCLEAR REGULATORY COMMISSION

21 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

22 In the Matter of)

23 SOUTHERN CALIFORNIA EDISON COMPANY,)
24 et al.,)

25 (San Onofre Nuclear Generating)
26 Station, Units 2 and 3).)

Docket Nos. 50-361 OD
50-362 OL

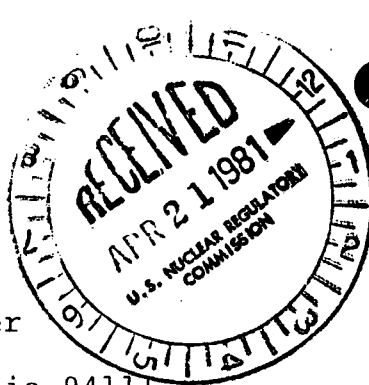
RESPONSE TO MOTION TO
COMPEL ANSWERS TO
INTERVENOR FOE, ET AL.'S
FIFTH SET OF INTERROGATORIES

27 Applicants hereby respond, pursuant to 10 C.F.R.
28 §2.370, to Intervenor FOE, et al.'s "Motion to Compel Answers
to Intervenor FOE, et al.'s Fifth Set of Interrogatories" by
providing, as requested, Intervenor, FOE, et al. with the
following supplemental response to Interrogatory No. 24:
INTERROGATORY NO. 24.

Do you contend that the Cristianitos Zone of
Deformation's structural relationship with the OZD is not
the controlling geologic structure for the seismic design of

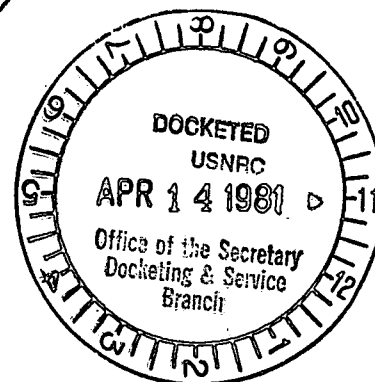
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RELATED CORRESPONDENCE

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1 SONGS 2 and 3? If so:

2 (a) State each and every fact upon which you base
3 this contention;

4 (b) Identify each and every document or communication
5 upon which you base this contention;

6 (c) Identify each and every person with knowledge
7 of the factual basis or bases for this contention, or on
8 whose writings, opinions or testimony you base this contention;
9 and

10 (d) Identify each and every person, expert or
11 otherwise, whom you expect to call as a witness at the
12 hearing before the Atomic Safety and Licensing Board in
13 support of this contention, and as to each potential witness
14 so identified provide the following information:

15 (i) State the substance of the facts and
16 opinions to which you expect the witness to testify;

17 (ii) Summarize the factual and theoretical
18 basis, as well as any other grounds, for each opinion to
19 which the witness is expected to testify.

20 ORIGINAL RESPONSE TO INTERROGATORY NO 24.

21 (a) Applicants contend there is no structural
22 relationship between the postulated Cristianitos Zone of
23 Deformations and the OZD, as described in the responses to
24 numerous of the previous Interrogatories. Applicants also
25 contend that the postulated Christianitos Zone of Deformation
26 is not the controlling geologic structure for the seismic
27 design of SONGS 2 and 3, as described in responses to previous
28 Interrogatories. The OZD is the controlling structure.

1 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 24.

2 (b) Applicants rely on documents listed in Appendix
3 1 as follows: 14, 17, 27, 29, 31(2) and the "Safety Evaluation
4 Report related to the operation of San Onofre Nuclear Generating
5 Station, Units 2 and 3, Docket Nos. 50-361 and 50-362,
6 Southern California Edison Company, et al." (NUREG 0712).

7 (c) The authors of the documents referenced to in
8 (b) above, as well as David Moore, Edward G. Heath, and
9 Jay L. Smith.

10 (d)(i)(ii) Witnesses' conclusions are set forth
11 in the above documents which speak for themselves. Applicants
12 object to a request to summarize said reports and on that
13 basis decline to answer these subparts of Interrogatory No. 24.

14 Dated: April 9, 1981.

15 DAVID R. PIGOTT
16 SAMUEL B. CASEY
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SOUTHERN CALIFORNIA EDISON COMPANY

20 By

John A. Mendez
John A. Mendez
One of Counsel for Applicants
SOUTHERN CALIFORNIA EDISON COMPANY
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PROOF OF SERVICE BY MAIL

I declare that:

I am employed in the City and County of San Francisco, California.

I am over the age of eighteen years and not a party to the within entitled action; my business address is Three Embarcadero Center, Twenty-Third Floor, San Francisco, California 94111.

On April 9, 1981 I served the attached RESPONSE TO MOTION TO COMPEL ANSWERS TO INTERVENOR FOE, ET AL'S FIFTH SET OF INTERROGATORIES on the following in said cause, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco addressed as follows:

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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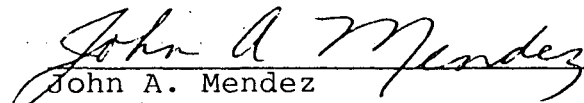
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