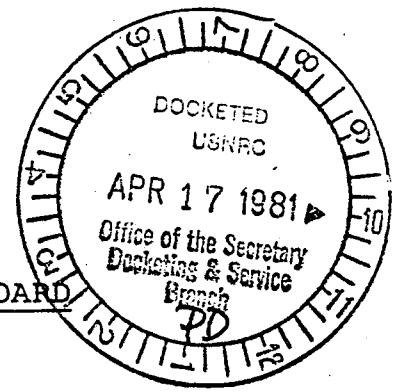


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RELATED CORRESPONDENCE



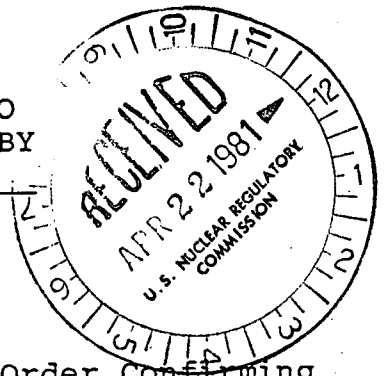
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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) )

Docket No. 50-361 OL  
50-362 OL

INTERVENOR F.O.E. ET AL. SUPPLEMENT TO  
ANSWERS TO INTERROGATORIES PROPOUNDED BY  
APPLICANTS NRC STAFF



INTRODUCTION

In accordance with the "Stipulation and Order Confirming Termination of Discovery on Issues in Contention and Supplementation of Answers to Prior Interrogatories" the following is submitted and constitutes Intervenor's updating of answers to all previous interrogatories propounded by NRC STAFF.

1. NRC Staff Interrogatories 1-1.a, b, and c, and 1-2, are essentially the same as Intervenor's Responses to Nos. 1-34 of Applicant's Second Set of Interrogatories to Intervenor's, dated February 2, 1981, which were provided to the NRC Staff, and all Parties on the Service List. Intervenor's Response to Applicants' Interrogatory No. 33 is specific in response to said Interrogatories. Intervenor's Responses to Staff Interrogatories 1-1.a, b, and c, and 1-2 are further updated and explained by the transcripts of Depositions of Intervenor's

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witnesses Dr. James N. Brune, Dr. Michael P. Kennedy, Mark Legg, and Dr. Gary Greene, which are dated March 30, 1981; March 27, 1981, March 20, 1981; and April 3, 1981, respectively. In each of these Depositions, the NRC Staff has had the opportunity to question Intervenors' witnesses regarding their educational and professional qualifications and to question them in regards to their views, positions and proposed testimony on Intervenors' Contention Number One and NRC Staff Interrogatories 1-1.a, b, c, and 1-2.

2. Intervenors' Response to NRC Staff Interrogatory Number 1-1.d.: Intervenors anticipate that Mark Legg, Richard Simons, Dr. James Brune, Dr. Michael Kennedy, and Dr. Gary Greene will each appear voluntarily in these proceedings. Other witnesses are being considered by the Intervenors at this time. Intervenors will update these Responses with Supplements of additional information that come to our attention. Intervenors will also provide updates with regards to whether or not other witnesses will appear voluntarily or under subpoena.

3. Intervenors' Updated Response to Staff Interrogatory 1-3: Intervenors F.O.E. et al. hereby incorporate by reference their response as set forth in Intervenors' Response to Applicant's Second Set of Interrogatories nos. 29, 29.a, b, c, d.i, and d.ii as though fully set forth.

4. Intervenors' Response to Staff Interrogatory 1-4.b: Intervenors hereby incorporate their responses as set forth in Intervenors' Responses (dated February 2, 1981) to Applicants' Interrogatories nos. 1-34, as though fully set forth.

5. Response 1-4.a: (1) The NRC Staff and the Applicants have not adequately considered the structural relationships between the OZD and the CZD and the Cristianitos Fault. The NRC has not required the Applicants to conduct an adequate amount of research to adequately determine these structural relationships.

(2) The NRC Staff and the Applicants have not adequately considered the structural relationship between the OZD and the Agua Blanca and San Miguel Fault Zones in Baja, California.

(3) The NRC Staff and the Applicant have not adequately considered the structural relationships between the OZD, the CZD, the Cristianitos Fault and the Whittier-Elsinore Fault Zone.

(4) The Geologic Structure Map-- Offshore San Onofre, dated September, 1980, by Greene and Kennedy, identifies a number of data voids where the NRC Staff and the Applicant have not adequately considered research requirements to determine the capability of the CZD.

(5) The NRC Staff has not required the Applicant to conduct adequate research in regards to the onshore projection of the Cristianitos Zone of Deformation.

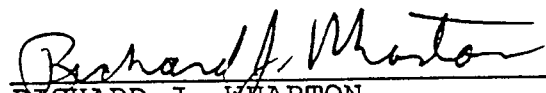
(6) The NRC Staff and the Applicant have not adequately considered that the maximum magnitude earthquake at the SONGS site should be the range M. 7.0 to M. 8.0.

(7) The NRC Staff and the Applicant

have not adequately considered the natural phenomena of directivity or seismic focusing.

Intervenors Response 1-4.c: The NRC Staff and the Applicant have not adequately considered the maximum vibratory ground motions in their analyses of the seismic design basis for SONGS 2 and 3. The site can experience ground motions greater than the .67 g horizontal and .44 g vertical design bases, because of seismic focusing or directivity and because of the new fault geometry offshore as mapped in September 1980 by Greene and Kennedy. The Cristianitos Zone of Deformation forms a structural relationship with the OZD and the Cristianitos Fault, thus qualifying the CZD and the Cristianitos Fault as capable faults, according to the definitions in 10 C.F.R. Part 100, Appendix A.

Respectfully submitted,

  
RICHARD J. WHARTON  
Attorney for Intervenors  
F.O.E. ET AL.

Dated at San Diego, California  
this 14th day of April, 1981.