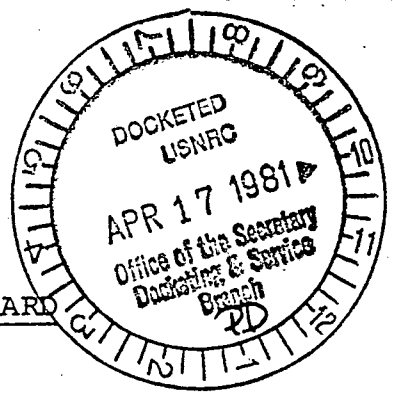


RELATED CORRESPONDENCE

4/15/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



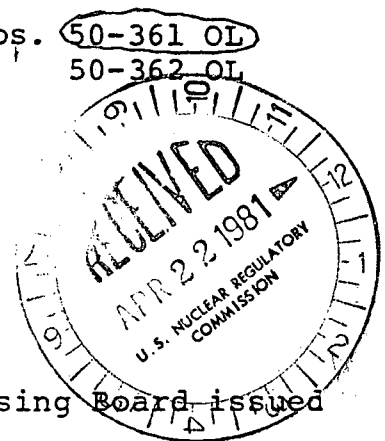
In the Matter of)

SOUTHERN CALIFORNIA EDISON COMPANY,)
ET AL.)

Docket Nos. 50-361 OL
50-362 OL

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

INTERVENOR'S F.O.E. ET AL. FURTHER
ANSWERS TO SOUTHERN CALIFORNIA
EDISON'S SECOND SET OF INTERROGATORIES



On March 31, 1981, the Atomic Safety and Licensing Board issued a Memorandum and Order which ordered Intervenor's F.O.E. et al. to further answer Southern California Edison's Second Set of Interrogatories, more specifically questions 10(d), 14(b), 14(c), 14(d), 17(d), 24(c), 24(d), 25(d), 26(d), 27(d), 29(d), 31(d), and 34. The following constitutes Intervenor's further answers to Interrogatories.

10(d): Dr. James N. Brune, Dr. Richard Simons, Dr. Gary Greene, Dr. Michael Kennedy, Mark Legg. This list includes the witnesses we expect to call or have made arrangements with to call as of this date. It is not intended to be a final list and Intervenor's F.O.E. et al. will reasonably supplement their response with respect to the identity of each person expected to be called as an expert at the hearing, the subject matter on which he/she is expected to testify and the substance of his/her testimony.

14(b): The wrench fault tectonics of the OZD-CZD wrench fault system are described in a report by T.P. Harding entitled "The Newport- Inglewood Trend, California--An Example of Wrenching Style of Deformation" DS03 1/1

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mation," published by the American Association of Petroleum Geologists (AAPG) Bulletin, volume 57, 1973, p. 97-116; and in another article in that same volume of the same publication, p. 74 to 96, entitled "Basic Wrench Tectonics" by R.E. Wilcox, T.P. Harding, and D.R. Seeley; and in another publication "Basic Wrench Tectonics" by Moody and Hill published in the Geological Society of America Bulletin, volume 67, #9, p. 1207-1246. The structural relationship of the Newport-Inglewood-OZD to the Cristianitos Fault Zone of Deformation is discussed and documented in the following documents and communications:

1. The map produced by the USGS and the CDMG, which was published in the Geological Society of America publication, in November 1979, entitled, "Earthquakes and other Perils in the San Diego Region," page 22.
2. The article entitled "Implications of Fault Patterns of the Inner California Continental Borderland between San Pedro and San Diego" by U.S. Geological Survey scientists H.G. Greene, K.A. Dailey, S.H. Clarke, and J.I. Ziony, and by the senior marine geologist from the state CDMG, M.P. Kennedy, November, 1979, GSA.
3. The transcript of the May 21, 1980, meeting between the NRC Staff, the USGS, and the Applicant.
4. The transcript of the August 14, 1980 meeting between the NRC Staff, the USGS, and the Applicant.
5. The tape recordings and other records of the September 23, 1980 meeting between the NRC Staff, the USGS, and CDMG, and the Applicant.
6. The initial report by Greene and Kennedy, entitled, "Review of Offshore Seismic Reflection Profiles in the Vicinity

of the Cristianitos Fault, San Onofre, California, which was sent by the USGS to the NRC Staff on August 13, 1980.

7. The Nekton report and profiles submitted by the Applicant to the NRC Staff, 1980.

8. The second report to the NRC Staff by the marine geologists from the USGS and the CDMG, entitled, "Addendum" to the report listed in No. 12b-5 above.

9. The letter from James F. Davis, State Geologist of the State of California, and Michael P. Kennedy, Senior Marine Geologist of the CDMG, to Bob Jackson, Chief Geologist of the NRC Staff, Geosciences Branch, dated August 11, 1980.

10. All other references to OZD as a wrench fault by NRC, USGS, and Applicant.

14(c): The authors of the reports listed in 14(b), including Dr. Gary Greene, Dr. Michael Kennedy, Dr. Jim Davis, Dr. Sam Clarke, and Dr. Joe Zione; also Mark Legg, Richard Simons, and James Brune.

14(d): Dr. James Brune, Dr. Michael Kennedy, Dr. Gary Greene, Dr. David Slemmons, Mark Legg, and Richard Simons. This list includes the witnesses we expect to call or have made arrangements with to call as of this date. It is not intended to be a final list and Intervenor's F.O.E. et al. will reasonably supplement their response with respect to the identity of each person expected to be called as an expert at the hearing, the subject matter on which he/she is expected to testify and the substance of his/her testimony.

17(d); Dr. Michael Kennedy and Mark Legg. This list includes the witnesses we expect to call or have made arrangements with to call as of this date. It is not intended to be a final list and Intervenor's F.O.E. et al. will reasonably supplement their response with respect

to the identity of each person expected to be called as an expert at the hearing, the subject matter on which he/she is expected to testify and the substance of his/her testimony.

24(c): The persons with knowledge of the factual basis or bases for this contention, or on whose writings, opinions or testimony we will base this contention are the authors of the reports listed in 24(b) and 25(b).

24(d): Dr. Gary Greene, Dr. Michael Kennedy, Mark R. Legg, Dr. Gordon Gastil, Dr. James Brune, Richard S. Simons. This list includes the witnesses we expect to call or have made arrangements with to call as of this date. It is not intended to be a final list and Intervenor's F.O.E. et al. will reasonably supplement their response with respect to the identity of each person expected to be called as an expert at the hearing, the subject matter on which he/she is expected to testify and the substance of his/her testimony.

25(d): Dr. James Brune, Dr. Gordon Gastil, Richard Simons, and Mark Legg. This list includes the witnesses we expect to call or have made arrangements with to call as of this date. It is not intended to be a final list and Intervenor's F.O.E. et al. will reasonably supplement their response with respect to the identity of each person expected to be called as an expert at the hearing, the subject matter on which he/she is expected to testify and the substance of his/her testimony.

26(d): Dr. James Brune, Dr. Gordon Gastil, Richard Simons, and Mark Legg. This list includes the witnesses we expect to call or have made arrangements with to call as of this date. It is not intended to be a final list and Intervenor's F.O.E. et al. will reasonably supplement their response with respect to the identity of each person expected to

be called as an expert at the hearing, the subject matter on which he/she is expected to testify and the substance of his/her testimony.

27(d): Dr. James N. Brune. This list includes the witnesses we expect to call or have made arrangements with to call as of this date. It is not intended to be a final list and Intervenor's F.O.E. et al. will reasonably supplement their response with respect to the identity of each person expected to be called as an expert at the hearing, the subject matter on which he/she is expected to testify and the substance of his/her testimony.

29(d): Dr. James N. Brune. This list includes the witnesses we expect to call or have made arrangements with to call as of this date. It is not intended to be a final list and Intervenor's F.O.E. et al. will reasonably supplement their response with respect to the identity of each person expected to be called as an expert at the hearing, the subject matter on which he/she is expected to testify and the substance of his/her testimony.

31(d): Dr. Gary Greene, Dr. Michael Kennedy, Mark Legg, Richard Simons. This list includes the witnesses we expect to call or have made arrangements with to call as of this date. It is not intended to be a final list and Intervenor's F.O.E. et al. will reasonably supplement their response with respect to the identity of each person expected to be called as an expert at the hearing, the subject matter on which he/she is expected to testify and the substance of his/her testimony.

34: Responses to Interrogatories 1 through 34 were prepared by J. Glenn Barlow, research consultant for the Intervenor. Each of the Responses 1-33 were reviewed by a Graduate Student in Geophysics,

Rick Adair, from the SIO-IGPP at UCSD.

Various authors of documents referenced in these Responses were communicated with in regards to our interpretations of their publications. These authors include Dr. J.N. Brune, Dr. R.S. Simons, Dr. J. Anderson, Dr. H. Greene, Dr. M.P. Kennedy, Mark Legg, Dr. Chris Buckley, Don Fife, and Dr. G. Gastil.

Intervenors' answer to Interrogatory #1 was reviewed by and discussed with Mark Legg and Richard Simons. Answer to #2 was prepared by Glenn Barlow, as stated in subsection b of each of the definition references discussed therein.

Answer to #3 was prepared by Glenn Barlow.

Answer to #4 was discussed with Dr. James Davis, California State Geologist, Dr. Michael Kennedy, California Senior Marine Geologist, Don Fife, Paul Morton and Russell Miller, CDMG staff scientists.

Answer to #5 was discussed with Dr. Michael Kennedy and Mark Legg.

Answer to #6 was discussed with Richard Simons, Mark Legg and Michael Kennedy, Don L. Fife, and Russell Miller.

Answer to #7 was discussed with Mark Legg, Richard Simons, Jim Davis, Dr. Michael Kennedy, Don Fife, and Dr. James Brune, and Dr. Gary Greene.

Answer to #8 was prepared by Glenn Barlow.

Answer to #9 was discussed with Mark Legg and Richard Simons.

Answer to #10 was discussed with Mark Legg, Richard Simons, and Dr. James Brune.

Answer to #11 was prepared by Glenn Barlow.

Answer to #12 was discussed with Mark Legg and Richard Simons and Dr. Michael Kennedy.

Answer to #13 was discussed with Dr. James Brune, Mark Legg, and

Richard Simons.

Answer to #14 was discussed with Dr. James Brune, Mark Legg and Richard Simons.

Answer to #15 was discussed with Dr. Michael Kennedy and Dr. Gary Greene, and Mark Legg and Richard Simons.

Answer to #16 was discussed with Dr. James Brune, Mark Legg, and Richard Simons.

Answer to #17 was discussed with Dr. Michael Kennedy.

Answer to #18 was discussed with Mark Legg, Richard Simons, and Dr. James Brune.

Answer to #19 was prepared by Glenn Barlow.

Answer to #20 was prepared by Glenn Barlow.

Answer to #21 was discussed with Mark Legg, Michael Kennedy, and Gary Greene.

Answer to #22 was discussed with Mark Legg, Dr. Michael Kennedy, and Dr. Gary Greene.

Answer to #23 was discussed with Greene and Kennedy.

Answers to #23, #25, and #26 were discussed with Dr. Michael Kennedy, Dr. James Brune, Dr. Gordon Gastil, Richard Simons, and Mark Legg.

Answer to #27 was discussed with Dr. James Brune and Dr. Chris Buckley.

Answer to #28 was prepared by Glenn Barlow.

Answer to #29 was discussed with Dr. James N. Brune and Dr. John Anderson.


Answer to #30 was prepared by Glenn Barlow.

Answer to #31 was discussed with Mark Legg, Richard Simons, and Dr. Michael Kennedy.

Answer to #32 was discussed with Dr. James Brune and Dr. Chris Buckley.
Answer to #33 was discussed with Dr. James Brune, Dr. John Anderson,
Dr. Michael Kennedy, Mark Legg, Richard Simons, and Dr. Jim Davis.

Dated: April 15, 1981

Respectfully submitted,



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

VERIFICATION

RICHARD J. WHARTON, declares


1. That he is Counsel for Intervenors, F.O.E. ET AL.
in this proceeding.

2. That he is authorized by Intervenors to execute and
verify the foregoing "ANSWERS TO SOUTHERN CALIFORNIA EDISON'S SECOND
SET OF INTERROGATORIES".

3. That he is informed and believes and upon such
information and belief affirms that the foregoing "ANSWERS TO SOUTHERN
CALIFORNIA EDISON'S SECOND SET OF INTERROGATORIES" is true and
correct.

I declare under penalty of perjury that the foregoing is
true and correct.

Executed April 15, 1981 in San Diego, California.


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