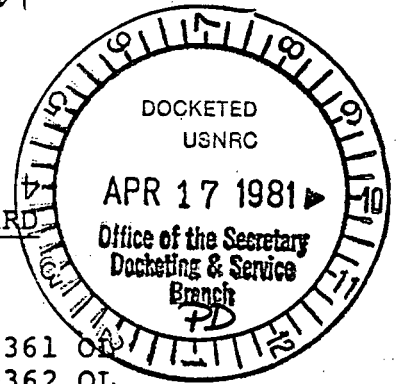


RELATED CORRESPONDENCE

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



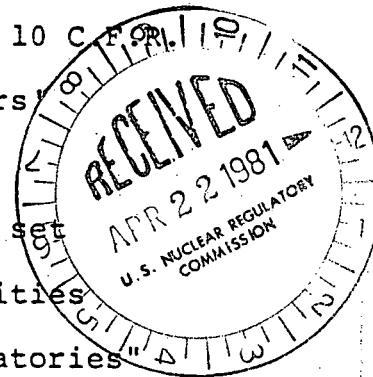
In the Matter of ) Docket No. 50-361 OL  
) 50-362 OL  
SOUTHERN CALIFORNIA EDISON COMPANY, )  
ET AL., ) MOTION TO COMPEL FURTHER ANSWERS TO  
) INTERROGATORIES PROPOUNDED BY INTERVENORS  
(San Onofre Nuclear Generating ) TO NRC STAFF SERVED ON FEBRUARY 19, 1981  
Station, Units 2 and 3) )  
)

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

Intervenor F.O.E. et al. ("Intervenors") hereby move the  
Atomic Safety and Licensing Board for an Order pursuant to 10 C.F.R.  
§2.740(f) compelling NRC Staff to further answer Intervenors'  
Interrogatories to NRC Staff served on February 19, 1981.

The grounds for the 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 the NRC Staff has made a general objection to Interrogatories  
No. 1, 2, 3, 4, 5, 6, 7, 12, 13, 14, 15, 16, 17, 19, 21, 22, and  
24; that the NRC Staff has failed or has responded evasively or  
incompletely to Interrogatories No. 8, 20, 25, 28, 29, 30, 31,  
32, 36, 37, 38, 39, 40, 41, 42, 43, 45, 46, 47, 49, 50, 51, 52,  
53, 54, 55, 56, 57, 58, 59, and 60.

This motion is based on this Motion to Compel, the  
accompanying Memorandum of Points and Authorities in Support  
thereof, the record in the above proceeding, and any and all



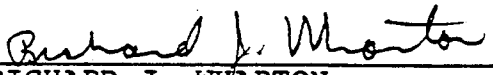
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such further oral arguments or documentary evidence as may come  
before the Board.

DATED: April 16, 1981.

Respectfully submitted,

  
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RICHARD J. WHARTON  
Attorney for Intervenors,  
FOE, ET.AL.