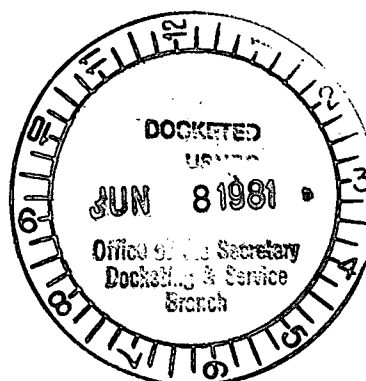


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13 UNITED STATES OF AMERICA

14 NUCLEAR REGULATORY COMMISSION

15 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

16 In the Matter of)	Docket Nos. 50-261 OL
)	50-262 OL
17 SOUTHERN CALIFORNIA)	APPLICANTS' RESPONSE IN
18 EDISON COMPANY, <u>ET AL.</u>)	SUPPORT OF MOTION FOR
)	CONTINUOUS HEARING ON
19 (San Onofre Nuclear Generating)	GEOLOGY/SEISMOLOGY
Station, Units 2 and 3))	CONTENTIONS

20
21 On June 1, 1981, "NRC Staff Motion for Continuous
22 Hearing on Geology/Seismology Contentions" was filed in the
23 above docket. Said Motion requests that responses be filed
24 within three (3) days of receipt. By oral order of the Board
25 made during a conference call with representatives of all
26 parties on June 2, 1981, the Board required that such responses
27 be made within the requested three-day period. Pursuant to
28 said oral order, Applicants hereby submit their response.

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I

San Onofre Units 2 and 3 are licensing impacted facilities. Construction can be completed by August 1, 1981. Construction will be complete prior to issuance of an operating license. Inability to use completed facilities will result in significant financial impact on Applicants. The Commission recognized the significance of such impact in its "Statement of Policy on Conduct of Licensing Proceedings" dated May 20, 1981. Under that guidance, unless a party will suffer some significant unfairness or the quality of the record will be impaired, the proceeding should be expedited to the full extent possible.

II

In the present case, the seismology/geology contentions are ripe for hearing. Discovery has been open for a number of years, and all NRC Staff and ACRS reviews are complete. Now is the time for hearing. Given the important nature of the proceedings, and the Commission's policy, the hearing should proceed as expeditiously as possible.

Applicants submit that the hearing should commence June 22, 1981, and run continuously thereafter until completed. Unless good cause is shown, intermittent recesses are

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1 unnecessary and unwarranted. Applicants fully support the
2 NRC Staff's Motion.

3 Respectfully submitted,

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5 EDWARD B. ROGIN
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13 By David R. Pigott
14 David R. Pigott
15 One of Counsel for Applicants
16 Southern California Edison
17 Company and San Diego Gas &
18 Electric Company

19 Dated: June 5, 1981
20
21
22
23
24
25
26
27
28

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 600 Montgomery Street, 10th Floor, San Francisco, California 94111.

On June 5, 1981, I served the attached APPLICANTS' RESPONSE IN SUPPORT OF MOTION FOR CONTINUOUS HEARING ON GEOLOGY/SEISMOLOGY CONTENTIONS in said cause, by placing a true copy thereof enclosed in the United States mail at Rosemead, California, addressed as follows:

James L. Kelley, Chairman
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
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Washington, D.C. 20555

Robert Dietch, Vice President
Southern California Edison
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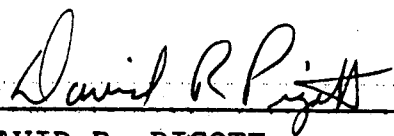
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10	Vista, CA 92083	Commission
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