

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8107020276 DOC. DATE: 81/05/01 NOTARIZED: NO  
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California  
 50-362 San Onofre Nuclear Station, Unit 3, Southern California  
 AUTH. NAME: AUTHOR AFFILIATION  
 MENDEZ, J. A. Southern California Edison Co.  
 MENDEZ, J. A. San Diego Gas & Electric Co.  
 MENDEZ, J. A. Orrick, Herrington & Sutcliffe  
 RECIP. NAME: RECIPIENT AFFILIATION  
 Atomic Safety and Licensing Board Panel

DOCKET #  
 05000361  
 05000362

SUBJECT: Supplemental response to Friends of the Earth motion to compel answers to fifth set of interrogatories. Replies to Interrogatory 24 re Cristianitos zone of deformation. W/proof of svc. Related correspondence.

DISTRIBUTION CODE: DS03S COPIES RECEIVED: LTR 2 ENCL 1 SIZE: 7  
 TITLE: Filings (Not Orig by NRC)

NOTES: Send all FSAR & ER amends to L Chandler. 05000361  
 1 cy: J Hanchett (Region V). D Scaletti, 1 cy of all envir info  
 Send all FSAR & ER amends to L Chandler. 05000362  
 1 cy: J Hanchett (Region V). D Scaletti, 1 cy of all envir info

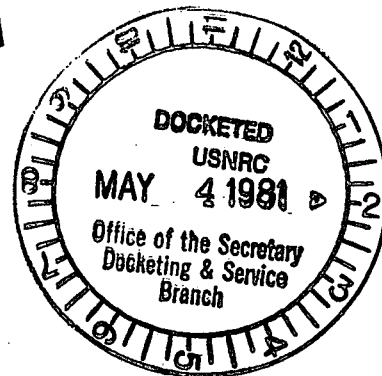
|           | RECIPIENT<br>ID CODE/NAME                       | COPIES<br>LTR ENCL       | RECIPIENT<br>ID CODE/NAME          | COPIES<br>LTR ENCL |
|-----------|---|--------------------------|------------------------------------|--------------------|
| ACTION:   | LIC BR #3 BC<br>ROOD, H.                        | 1 1                      | LIC BR #3 LA                       | 1                  |
| INTERNAL: | ASLAP<br>I&E<br>OELD, BLANTON<br>PUBLIC AFFAIRS | 5 5<br>2 2<br>1 1<br>1 1 | ASLB<br>NRC PDR<br>OGC<br>REG FILE | 1<br>1<br>1<br>1   |
| EXTERNAL: | LPDR<br>NTIS                                    | 1 1                      | NSIC                               | 1                  |

JUL 06 1981

TOTAL NUMBER OF COPIES REQUIRED: LTR 0 ENCL 20

RELATED CORRESPONDENCE

5/11/81



DAVID R. PIGOTT  
SAMUEL B. CASEY  
JOHN A. MENDEZ  
Of ORRICK, HERRINGTON & SUTCLIFFE  
A Professional Corporation  
600 Montgomery Street  
San Francisco, CA 94111  
Telephone: (415) 392-1122

CHARLES R. KOCHER  
JAMES A. BEOLETTO  
SOUTHERN CALIFORNIA EDISON COMPANY  
P.O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, California 91770  
Telephone: (213) 572-1900

Attorneys for Applicants,  
Southern California Edison Company and  
San Diego Gas & Electric Company

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

|                                     |   |                                     |
|-------------------------------------|---|-------------------------------------|
| In the Matter of                    | ) |                                     |
|                                     | ) | Docket Nos. 50-361 OL               |
| SOUTHERN CALIFORNIA EDISON COMPANY, | ) | 50-362 OL                           |
| et al.,                             | ) | SUPPLEMENTAL                        |
|                                     | ) | RESPONSE TO MOTION TO               |
| (San Onofre Nuclear Generating      | ) | COMPEL ANSWERS TO                   |
| Station, Units 2 and 3).            | ) | INTERVENOR FOE, ET AL.'S            |
|                                     | ) | <u>FIFTH SET OF INTERROGATORIES</u> |

Applicants hereby respond, pursuant to 10 C.F.R.  
§2.370 and the "Memorandum and Order (Rulings on Motion for  
Protective Order)" of the Atomic Safety and Licensing Board  
(April 17, 1981), to Intervenor FOE, et al.'s "Motion to  
Compel Answers to Intervenor FOE, et al.'s Fifth Set of  
Interrogatories" by providing Intervenor, FOE, et al. with  
the following second supplemental response to Interrogatory  
No. 24:

/////

DS03  
5/11

8107020276

G

1 INTERROGATORY NO. 24.

2 Do you contend that the Cristianitos Zone of  
3 Deformation's structural relationship with the OZD is not  
4 the controlling geologic structure for the seismic design of  
5 SONGS 2 and 3? If so:

6 (a) State each and every fact upon which you base  
7 this contention;

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

10 (c) Identify each and every person with knowledge  
11 of the factual basis or bases for this contention, or on  
12 whose writings, opinions or testimony you base this contention;  
13 and

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

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

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

24 /////

25 /////

26 /////

27 /////

28 /////

1 ORIGINAL RESPONSE TO INTERROGATORY NO 24.

2 (a) Applicants contend there is no structural  
3 relationship between the postulated Cristianitos Zone of  
4 Deformations and the OZD, as described in the responses to  
5 numerous of the previous Interrogatories. Applicants also  
6 contend that the postulated Christianitos Zone of Deformation  
7 is not the controlling geologic structure for the seismic  
8 design of SONGS 2 and 3, as described in responses to previous  
9 Interrogatories. The OZD is the controlling structure.

10 FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 24.

11 (b) Applicants rely on documents listed in Appendix  
12 1 as follows: 14, 17, 27, 29, 31(2) and the "Safety Evaluation  
13 Report related to the operation of San Onofre Nuclear Generating  
14 Station, Units 2 and 3, Docket Nos. 50-361 and 50-362,  
15 Southern California Edison Company, et al." (NUREG 0712).

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

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

24 /////

25 /////

26 /////

27 /////

28 /////

1 SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 24.

2 (d) Potential witnesses are David Moore, Edward G.  
3 Heath, and Jay L. Smith.

4 Dated: 5/1/81

5 DAVID R. PIGOTT  
6 SAMUEL B. CASEY  
7 JOHN A. MENDEZ  
Of ORRICK, HERRINGTON & SUTCLIFFE  
A Professional Corporation

8 CHARLES R. KOCHER  
9 JAMES A. BEOLETTO  
SOUTHERN CALIFORNIA EDISON COMPANY

10  
11 By John A. Mendez  
12 John A. Mendez  
13 One of Counsel for Applicants  
14 SOUTHERN CALIFORNIA EDISON COMPANY  
15 and SAN DIEGO GAS & ELECTRIC CO.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1                                    PROOF OF SERVICE BY MAIL

2                    I declare that:

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

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

9                    On May 1, 1981 I served the attached SUPPLEMENTAL  
10 RESPONSE TO MOTION TO COMPEL ANSWERS TO INTERVENOR FOE, ET AL.'s  
11 FIFTH SET OF INTERROGATORIES in said cause, by placing a true  
12 copy thereof enclosed in the United States mail at San Francisco  
13 addressed as follows:

14  
15                    James L. Kelley, Chairman  
16                    Administrative Judge  
17                    Atomic Safety and Licensing Board  
18                    U.S. Nuclear Regulatory Commission  
19                    Washington, D.C. 20555

20                    Dr. Cadet H. Hand, Jr.  
21                    Administrative Judge  
22                    c/o Bodega Marine Laboratory  
23                    University of California  
24                    P.O. Box 247  
25                    Bodega Bay, California 94923

26                    Mrs. Elizabeth B. Johnson  
27                    Administrative Judge  
28                    Oak Ridge National Laboratory  
                    P.O. Box X, Building 3500  
                    Oak Ridge, Tennessee 37830

1 David W. Gilman  
2 Robert G. Lacy  
3 San Diego Gas & Electric Company  
4 P.O. Box 1831  
5 San Diego, California 92112

6 Robert Dietch, Vice President  
7 Southern California Edison Company  
8 P.O. Box 800  
9 2244 Walnut Grove Avenue  
10 Rosemead, California 91770

11 Alan R. Watts, Esq.  
12 Rourke & Woodruff  
13 California First Bank Building  
14 10555 North Main Street  
15 Santa Ana, California 92701

16 Lawrence J. Chandler, Esq.  
17 Office of the Executive  
18 Legal Director  
19 U.S. Nuclear Regulatory  
20 Commission  
21 Washington, D.C. 20555

22 Janice E. Kerr, Esq.  
23 J. Calvin Simpson, Esq.  
24 Lawrence Q. Garcia, Esq.  
25 California Public Utilities  
26 Commission  
27 5066 State Building  
28 San Francisco, California 94102

Mr. Loyd von Haden  
2089 Foothill Drive  
Vista, California 92083

Mrs. Lyn Harris Hicks  
G U A R D  
3908 Calle Ariana  
San Clemente, CA 92801.

James F. Davis  
State Geologist  
Division of Mines and Geology  
1416 Ninth Street, Room 1341  
Sacramento, California 95814

Richard J. Wharton, Esq.  
University of San Diego  
School of Law  
Alcala Park  
San Diego, CA 92110

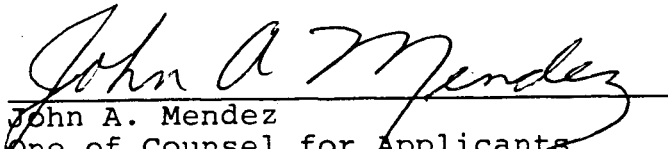
1 Phyllis M. Gallagher, Esq.  
2 1695 W. Crescent Avenue, Suite 222  
3 Anaheim, California 92801

4 Atomic Safety and Licensing Board  
5 U.S. Nuclear Regulatory Commission  
6 Washington, D.C. 20555

7 Docketing and Service Section  
8 Office of the Secretary  
9 U.S. Nuclear Regulatory Commission  
10 Washington, D.C. 20555

11 Richard K. Hoefling, Esq.  
12 U.S. Nuclear Regulatory Commission  
13 Office of the Executive Legal Director  
14 Washington, D.C. 20555

15 Charles E. McClung, Jr., Esq.  
16 23521 Paseo de Valencia, Suite 308  
17 Laguna Hills, CA 92653

18   
19 John A. Mendez  
20 One of Counsel for Applicants  
21 SOUTHERN CALIFORNIA EDISON COMPANY  
22 and SAN DIEGO GAS & ELECTRIC CO.  
23  
24  
25  
26  
27  
28