

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)	
)	
PUGET SOUND POWER & LIGHT)	DOCKET NOS. STN 50-522
COMPANY, et al.,)	50-523
)	
(Skagit Nuclear Power Project,)	
Units 1 and 2))	October 30, 1979
)	
)	

INTERROGATORIES TO APPLICANT REGARDING
SAN JUAN ISLANDS SEISMIC PROFILES

The purpose of these interrogatories is to determine when and by what means the Applicant learned of the existence and content of the seismic profiles of the San Juan Islands produced by Western Geophysical in 1971 and other data relevant to the San Juan features; and to determine when and by what means Applicant provided these data to the NRC Staff and USGS. This information is sought in order to determine whether Applicant has made a material false statement, as that term is used in Section 186 of the Atomic Energy Act, 42 U.S.C. §2236.

In accordance with 10 CFR §2.740(b) and 10 CFR §2.741, please answer the following Interrogatories and respond to the accompanying Requests for Production.

Documents to be produced should be presented at the offices of undersigned counsel at 5:00 p.m., November 26, 1979, or at such other time and place as may be agreed upon.

As used herein, the term "document" means all writings and records of every type in the possession or control of Applicant or its directors, officers, members, employees, attorneys, consultants, agents or representatives, including, but not limited to, memoranda, correspondence, reports, surveys, charts, books, photographs, maps, notes, studies, drawings, writings, minutes, computerized data or printouts, notes of telephone conversations, notes of meetings or other conversations, and all other records.

DATED this 30th day of October, 1979.

ROGER M. LEED

By Michael W. Leeder

1428 297

INTERROGATORY NO. 1: On what date did Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, including Dr. Milton Dobrin, become aware of the existence of the 1970 study done by Western Geophysical for Mobil Oil, surveying the ocean floor in the straits of Georgia?

ANSWER:

INTERROGATORY NO. 2: Please state the manner in which Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, including Dr. Milton Dobrin became aware of the study, the source of the information, and the name or names of the persons at Puget who received the information.

ANSWER:

INTERROGATORY NO. 3: When did Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, including Dr. Milton Dobrin, learn of the contents of the 1970 study performed by Western Geophysical for Mobil Oil?

ANSWER:

INTERROGATORY NO. 4: Please state the manner in which Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, including Dr. Milton Dobrin, became aware of the study, the source of the information, and the name or names of the persons at Puget who received the information.

ANSWER:

INTERROGATORY NO. 5: On what date did Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, including Dr. Milton Dobrin, obtain a copy of the 1970 study referenced in interrogatory no. 1, and from whom was it obtained?

ANSWER:

INTERROGATORY NO. 6: Please answer the foregoing interrogatories nos. 1 through 5 with respect to the 1971 study of seismic profiles in the San Juan Islands performed by Western Geophysical.

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INTERROGATORY NO. 7: With reference to the study commissioned by Puget Sound Power & Light Company from Western Geophysical, please state the dates on which the study was commissioned, completed, and made available to Puget Sound Power & Light Company.

ANSWER:

INTERROGATORY NO. 8: Please state with respect to each of the three studies referenced in these interrogatories:

a. When Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, communicated the existence of each study to the NRC Staff.

b. When Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, communicated the existence of each study to the United States Geologic Survey.

c. When Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, communicated the contents of each study to the NRC Staff.

d. When Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, communicated the contents of each study to the United States Geologic Survey.

e. The date on which Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, provided a copy of each study to the NRC Staff.

f. The date on which Puget Sound Power & Light Company or any of its agents, attorneys, or consultants, provided a copy of each study to the United States Geologic Survey.

ANSWER:

INTERROGATORY NO. 9: With respect to subparts (a) through (f) of the foregoing interrogatory (Interrogatory No. 8) please furnish the name or names of each employee of or person retained by Puget Sound Power & Light Company or other person who communicated the information to the NRC Staff or to the U.S.G.S., the matter in which the information was communicated, and the name or names of the persons within the NRC Staff or the U.S.G.S. whom Puget Sound Power & Light Company knows or has to reason to believe was made aware of the existence or contents of the information, or who has been provided copies of the data.

ANSWER:

INTERROGATORY NO. 10 Please furnish the name of each person who was in the employ of or retained by Bechtel or Puget Sound Power & Light Company, at any time subsequent to 1970, and who at any time was employed by, retained by, or associated in any manner with Western Geophysical or Mobil Oil.

ANSWER:

INTERROGATORY NO. 11: For each person listed in response to Interrogatory No. 10, please state:

- (a) the dates on which such person was associated with Bechtel or Puget;
- (b) the nature of the association;
- (c) whether and when such person was aware of the existence or contents of the studies performed by Western Geophysical, or had in their possession a copy of each or any study;
- (d) the dates on which such person was associated with Western Geophysical or Mobil Oil;
- (e) the nature of the association;
- (f) whether and in what manner such person was involved in performing the studies; and

(g) whether, in what manner, and when such person communicated the existence of, contents of, or provided copies of any of the 3 studies.

ANSWER:

INTERROGATORY NO. 12: Please state whether Milton Dobrin participated in performing any of the studies for Western Geophysical, or was aware of the existence of or contents of these studies, and whether, when, in what manner, and to whom, Dr. Dobrin communicated the existence, contents, or made copies available of these studies to Puget or Bechtel.

ANSWER:

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INTERROGATORY NO. 13: Please state whether, when, in what manner, and from whom Merlyn J. Adair learned of the existence of, contents of, or was provided copies of any or all of the three studies performed by Western Geophysical.

ANSWER:

INTERROGATORY NO. 14: Please state the names of all persons within Western Geophysical, Mobil Oil, Bechtel, Puget, the USGS, and the NRC Staff with whom Mr. Adair communicated, and provide the dates of such communications, regarding any studies performed by Western Geophysical relating to San Juan Island features.

ANSWER:

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INTERROGATORY NO. 15: Please describe specifically all internal and external communications, whether or not reflected in any written records, by or to Puget or Bechtel or Dr. Milton Dobrin, which in any way relate to the 1970 Mobil seismic study above identified, the 1971 Western Geophysical study above identified, and the Western Geophysical study conducted for Puget.

ANSWER:

REQUEST FOR PRODUCTION NO. 1: Please produce for inspection and copying any and all documents which are described in answers to, or contain information relevant to the foregoing interrogatories, and any or all documents used by Puget Sound Power & Light Company in preparing responses to the foregoing interrogatories.