

RELATED CORRESPONDENCE



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 NRC STAFF REGARDING  
SAN JUAN ISLANDS SEISMIC PROFILES

The purpose of these interrogatories is to determine when and by what means the NRC Staff 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. This information is sought in order to determine whether Applicant has made a material false statement, as that term is used in Section 136 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 the Staff 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, notes of telephone conversations, notes of meetings on other conversations, and all other records.

DATED this 31<sup>st</sup> day of October, 1979.

ROGER M. LEED

By 

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INTERROGATORY NO. 1: Please state the date on which the Staff learned of the existence of seismic profiles in the vicinity of the San Juan Islands performed by Western Geophysical in 1970 or 1971.

ANSWER:

INTERROGATORY NO. 2: Please state the source of the information provided in response to interrogatory no. 1.

ANSWER:

INTERROGATORY NO. 3: On what date did the NRC Staff learn the contents of the seismic profiles referred to in interrogatory no. 1?

ANSWER:

INTERROGATORY NO. 4: Please state the source of the information provided in response to interrogatory no. 3.

ANSWER:

INTERROGATORY NO. 5: On what date did the NRC Staff obtain copies of the seismic profiles referred to in interrogatory no. 1?

ANSWER:

INTERROGATORY NO. 6: Please state the source of the information provided in response to interrogatory no. 5.

ANSWER:

INTERROGATORY NO. 7: With respect to each of the foregoing interrogatories, please state:

- a. The date on which Puget Sound Power & Light Company made this information available to the Staff;
- b. The name of the representative of Puget Sound Power & Light Company who made the information available to the Staff; and
- c. The name of the NRC Staff member who received the information from Puget Sound Power & Light Company, or from any other source.

ANSWER:

INTERROGATORY NO. 8. Please answer Interrogatories Nos. 1-7 with respect to the 1970 study performed by Western Geophysical for Mobil Oil.

ANSWER:

INTERROGATORY NO. 9: Please answer Interrogatories Nos. 1-7 with respect to the study of the San Juan region commissioned by Applicant from Western Geophysical.

ANSWER:

REQUEST FOR PRODUCTION NO. 1: Please produce any or all documents which contain information relevant to the foregoing interrogatories, and any or all documents used by the NRC Staff in preparing responses to the foregoing interrogatories.



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NUCLEAR REGULATORY COMMISSION

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DOCKET NOS. STN 50-522  
50-523

CERTIFICATE OF SERVICE

I hereby certify that copies of:

INTERROGATORIES TO NRC STAFF REGARDING SAN JUAN ISLAND  
SEISMIC PROFILES  
and  
INTERROGATORIES TO APPLICANT REGARDING SAN JUAN ISLAND  
SEISMIC PROFILES

dated October 31, 1979, have been served on the following  
by depositing the same in the United States mail, postage  
prepaid, on this 31st day of October, 1979.

Valentine B. Deale, Esq., Chairman  
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DATED: October 31, 1977

ROGER M. LEED

By Michael W. Leeder

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