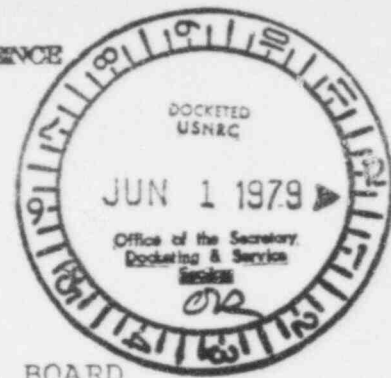


NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)

PUGET SOUND POWER & LIGHT)
COMPANY, et al.,)DOCKET NOS. STN 50-522
50-523(Skagit Water & Power Project,)
Units 1 and 2)
_____)**DO NOT ORIGINAL**INTROVENOR SCANP'S INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO APPLICANTS OF MAY 24, 1979

In accordance with 10 CFR, §2.740B 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 9:00 a.m. on the 20th day
after service of this discovery, or at such other time and
place as may be agreed upon.

REQUEST FOR PRODUCTION NO. 1. The letter of March 29,
1979 from J. E. Mecca to John F. Stolz describes on page 2
an extensive reinvestigation of the site area conducted by
Bechtel. Please produce all field mapping and field notes
made in connection with this extensive reinvestigation.

REQUEST FOR PRODUCTION NO. 2. In connection with the
extensive reinvestigation undertaken by Bechtel referred to

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in Request for Production No. 1, please produce all aeromagnetic surveys and interpretations thereof.

REQUEST FOR PRODUCTION NO. 3. In connection with the extensive reinvestigation referenced in Request for Production No.1, please produce all data and interpretations produced through reinvestigation of the site area involving magnetics.

REQUEST FOR PRODUCTION NO. 4. With respect to the reinvestigation referenced in Request for Production No. 1, please produce all data and interpretations obtained in re-review of imagery studies.

INTERROGATORY NO. 1. In connection with the reinvestigation referenced in Request for Production No. 1, please describe all other investigative programs undertaken on Gilligan and Day Creeks in response to the NRC's questions.

ANSWER:

POOR ORIGINAL

REQUEST FOR PRODUCTION NO. 5. Please produce any data, interpretations, or other written materials produced or assessed in connection with these other investigative programs referenced in Interrogatory No. 1 above.

INTERROGATORY NO. 2. In connection with the reinvestigation referenced in Request for Production No. 1, please describe the information from seismic profiles which have been reviewed to define if a structure as hypothesized by Dr. Hays exists.

ANSWER:

POOR ORIGINAL

REQUEST FOR PRODUCTION NO. 6. Please produce all of the information described in Interrogatory No. 2 above.

INTERROGATORY NO. 3. Please describe any factual conclusions which Applicants reached based upon the extensive reinvestigation undertaken by Bechtel considering the hypothesized "P & B Fault", including a discussion of how this reinvestigation supports those conclusions. .

REQUEST FOR PRODUCTION NO. 7. Please produce any minutes, memoranda, or notes taken or produced in connection with the discussions with Dr. Hays and other reviewers referenced on pages 1 and 2 of the letter referred to in Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 8. Please produce the aeromagnetic data referenced in the letter dated February 23, 1979

from J. E. Mecca to John F. Stolz. Please produce also any aeromagnetic data acquired for Puget Power by I.K.R. Resources, Inc. and Aero Services, which has not been submitted to the NRC staff or USGS. Please submit also all written evaluations of this data, including the factual conclusions, if any, which applicants have reached in connection with this data and the basis thereof.

INTERROGATORY NO. 4. Please describe the location, quantity, and types of gravel which applicants intend to use for construction of the Skagit Nuclear Power Project. Please state whether any studies have been undertaken to assess the environmental and other impacts of gravel removal, including impacts on fisheries. If any such studies have been undertaken, please produce all documents, including notes, produced in connection with such studies.

ANSWER:

POOR ORIGINAL

INTERROGATORY NO. 5. Please state whether applicants have reevaluated or amended their evacuation plan in light of 1) the proposed use of the Northern State Hospital Site,

and 2) the 3-Mile Island Accident. Please produce documents produced in connection with any such reevaluation.

ANSWER:

POOR ORIGINAL

REQUEST FOR PRODUCTION NO. 9. With reference to the meeting of February 23, 1979, between the NRC staff, USGS, and Puget Sound Power & Light Company, held in Bethesda, Maryland, please produce all materials presented by Puget at that meeting, together with any and all notes taken by Puget representatives at that meeting.

INTERROGATORY NO. 6. On March 8, 1979, the Washington Utilities and Transportation Commission issued a Second Supplemental Order in Cause No. U-78-21. The Commission in that order authorized Puget to file tariff revisions, including revenues for construction work in progress (CWIP). Please state the annual dollar amount of CWIP rates which Puget has sought or will seek in its revised filing. Please state the annual dollar amount of CWIP rates which are attributed to the Skagit Nuclear Power Project, and please itemize all amounts thereunder. Please include in your

answer the amount for the next year and every year thereafter included in the revised tariff filing.

ANSWER:

POOR ORIGINAL

INTERROGATORY NO. 7. With respect to the proceeding referenced in the immediately preceding interrogatory, please answer all questions in that Interrogatory with respect to the tariff filing which was rejected in the Commission's Second Supplemental Order.

ANSWER:

REQUEST FOR PRODUCTION NO. 10. Produce all notes, memoranda, correspondence, studies, reports and other documents of any kind relating in any way to the proposed WWP coal-fired plant in Eastern Washington, including all such materials in the hands of engineers and consultants.

INTERROGATORY NO. 8. With respect to the proposed WWP coal-fired plants in Eastern Washington:

- a) What sources for coal have been considered?
- b) Describe all information WWP has regarding availability, supply, price, and transportation cost for such coal.
- c) Who will 1) design, 2) build, and 3) operate the plant?
- d) When did design work begin?
- e) Have any purchases been made to date relating to such plant, and if so, when, by whom, from whom, of what, and in what amount?
- f) Is such plant yet reflected in any formal or informal, in-house, or public forecast of resources?
- g) When is construction to begin?

ANSWER:

INTERROGATORY NO. 9. Please describe all geologic, seismicologic, and geophysical studies, reports, or investigations, pertaining to the Skagit site or any location in the State of Washington, undertaken by, commissioned by, or received by you since January 1, 1978.

ANSWER:

INTERROGATORY NO. 10. Please give all available information regarding every detectable earthquake which has occurred within 25 miles of the plant site since 1976. You should furnish the location of epicenters, magnitude, and fault plane solutions, if available. Also state where you obtained the information which you are furnishing in answer to this interrogatory, and whether you know of any source of information which you did not consult. Also state whether, to your knowledge, any person is analyzing such data to determine possible correlations between such events, and if so who.

ANSWER:

274 251

INTERROGATORY NO. 11. Have you at any time requested or commissioned a study to attempt to correlate the fault plane solutions for any earthquakes which have occurred, since 1973, in the Skagit Valley? If so, please state when you commissioned such study, who is conducting such study, and identify all documents which reflect the fact of such study, and its results. Also, please provide a list showing all available data regarding every known earthquake which has occurred in the Skagit Valley since 1973.

ANSWER:

DATED this 29 day of May, 1979.



ROGER M. LEED