

ATTACHMENT TO ENCLOSURE 3

**PUGET
POWER**

March 29, 1979
PLN-214

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Light Water Reactors Branch 1
Division of Project Management
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Puget Sound Power & Light Company
Skagit Nuclear Power Project, Units 1 & 2
Docket Numbers 50-522 and 50-523
Clarification of the pending April 18, 1979
meeting between Puget and the NRC on the
hypothetical "B & B Fault"

Dear Mr. Stolz:

In order that the meeting scheduled for April 18, 1979 referenced above be most productive, we feel it is important to define the concerns. The purpose of this transmission is to put forth our understanding relative to concerns associated with the hypothetical "B & B fault" as derived from hearing testimony and subsequent conversations with members of the NRC/USGS review staff.

The question of the hypothetical "B & B fault" first arose during the March, 1978 hearings before the Atomic Safety and Licensing Board. At that time, a USGS witness, Dr. William Hays, hypothesized a fault west of the plant site. The hypothesized fault was, for discussion purposes, labeled the "B & B fault". In his testimony, Dr. Hays emphasized that he was not stating that the "B & B fault" existed, but rather that he considered it to be a conceivable fault.

Dr. Hays described the hypothetical fault as lying immediately to the west of Lummi Island, continuing to the southeast through Samish Bay and across the Skagit River flood plain, then curving eastward across Walker Valley and through the Table Mountain area and then finally curving more to the southeast and joining the Devil's Mountain fault zone a short distance east of Lake Cavanaugh. During the hearings, Dr. Hays drew the southeastern trace of the hypothetical fault on a topographical map which had been labeled Exhibit 132. Additional discussion with Dr. Hays and other reviewers indicated that the hypothetical fault if it existed would exhibit Quaternary displacement.

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The basis for Dr. Hays postulation of the "B & B fault" as we understand from review of the testimony and discussions with him are as follows:

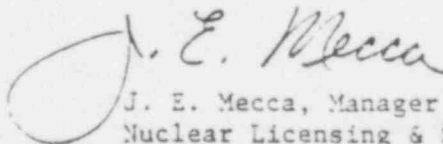
1. The suggestion by Dr. Peter Ward, an assistant professor at Ohio State University in a letter dated December 5, 1977 to the USGS that there may be a northwesterly trending fault between Lummi Island and two small islands (Barnes and Clark Islands) to the west of Lummi Island. The apparent reasons for inferring a fault between Lummi and Clark Islands are:
 - a. Nanaimo sediments on Barnes and Clark Islands which were deposited in deep marine water are located near Chuckanut sediments on Lummi Island which were deposited either on land or in shallow, fresh water; and,
 - b. These sedimentary materials are coeval - i.e., were deposited at about the same time.
2. During Dr. Hays' testimony, he noted that the Table Mountain area is a highly sheared imbricated area with a tectonic intermixing of lithologies. He said it was possible to interpret this information as being related to a structure such as he hypothesized.

Since the March 1978 hearings our consultant, Bechtel, has embarked upon an extensive reinvestigation of the site area involving field mapping, aeromagnetic surveying and interpretation, magnetics, re-review of imagery studies and other investigative programs as appropriate to respond to the NRC's questions on Gilligan and Day Creeks. The same information as it might relate to the hypothesized "B & B fault" has been reviewed together with information from seismic profiles to define if a structure as hypothesized by Dr. Hays exists. A substantial amount of the information under consideration has been available to all parties for quite some time.

It is our intention to discuss with the NRC/USGS on April 18, 1979 all information which possibly could relate to the hypothetical "B & B fault" as defined above. We would expect to leave with the reviewers copies of any data and evidence presented. We would further expect to carry on dialog with the reviewers so that our forthcoming geology report can provide the basis for resolving this issue.

If we are in error regarding our interpretation of the NRC/USGS concerns regarding the hypothetical B & B structure, the basis for it, additional basis not noted, or objectives for the April 18, 1979 meeting please inform us as soon as possible.

Very truly yours,


J. E. Mecca, Manager
Nuclear Licensing & Safety

JEM/bw

cc: Correspondence List
ASLB Correspondence List

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