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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
PUGET SOUND POWER & LIGHT)	Docket Nos. 50-522
COMPANY, et al.)	50-523
)	
(Skagit Nuclear Power Project,)	May 31, 1979
<u>Units 1 and 2)</u>)	

APPLICANTS' INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO INTERVENOR SCANP

TO: SKAGITONIANS CONCERNED ABOUT NUCLEAR PLANTS (SCANP)
and Roger M. Leed, its attorney.

Pursuant to 10 CFR § 2.740(b), Applicants propound the following interrogatories to Intervenor SCANP, to be answered by a duly authorized officer or agent fully in writing under oath or affirmation within 14 days.

Pursuant to 10 CFR § 2.741, Applicants request that you produce and permit Applicants' counsel to inspect and copy, within 20 days, at the offices of Applicants' counsel during normal business hours, the documents designated below. Documents which have previously been produced for Applicants' counsel need not be produced pursuant to this request.

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As used herein, the term "document" means all writings and recordings of every type in the possession or control of SCANP 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 or other conversations, and all other records.

INTERROGATORY NO. 1: With respect to the statement by Mr. Leed at the conference on April 24, 1979 (Tr. 11,894) regarding "earthquakes which have occurred in the Skagit Valley more recently than those which were discussed at the last hearing",

- a. Identify each such earthquake by date and approximate time of occurrence.
- b. State all facts known to you regarding each such earthquake, including, but not limited to, its location, magnitude and focal depth, and any fault plane solutions, any studies attempting to correlate fault plane solutions for earthquakes in the Skagit Valley, or other seismic analysis.

- c. Identify all documents that refer to any such earthquake.
- d. Identify by name, address and occupation all persons having knowledge of facts regarding any such earthquake.

INTERROGATORY NO. 2: With respect to the statement by Mr. Leed at the conference on April 24, 1979 (Tr. 11,894) about "the continuing investigations that have been undertaken by a number of parties including seven (sic?) other dockets on the Straight Creek Fault",

- a. Identify each such continuing investigation.
- b. State all facts known to you regarding each such continuing investigation, including, but not limited to, the person or organization that performed or is performing the investigation, the scope of the investigation, the information gathered in such investigation, and any report written or presented orally on the investigation.
- c. Identify all documents that relate to any such continuing investigation.

- d. Identify by name, address and occupation all persons having knowledge of facts regarding any such investigation.

INTERROGATORY NO. 3: With respect to the question by Mr. Leed at the conference on April 24, 1979 (Tr. 11,894) regarding an updating of "information on faulting associated with the trend identified by Dr. Choney, what he has called the Bellingham Bay Fault, including information from Canadian sources and publications",

- a. Identify all such information, including that from Canadian sources and publications.
- b. Identify all documents that refer to or set forth any such information.
- c. Identify by name, address and occupation all persons having knowledge of such information.

INTERROGATORY NO. 4: Identify all geologic mapping and other field work in relation to the Skagit Nuclear Power Project that has been performed by or for SCANP or its attorneys,

agents, employees, consultants or any other persons acting on its behalf. If any such work has been performed,

- a. Identify by name, address and occupation the persons who performed the work.
- b. Indicate the number of hours or days spent on the work.
- c. Describe in detail the scope of work performed, the geographical areas covered and findings of such work.
- d. Identify all documents prepared in connection with the work.
- e. Identify and summarize any oral reports made in connection with the work.

INTERROGATORY NO. 5: Identify all geological, seismological, geophysical, or geotechnical studies, analyses, evaluations, reviews or other work in relation to the Skagit Nuclear Power Project which have been conducted by or for SCANP or its attorneys, agents, employees, consultants or any other persons acting on its behalf. With respect to each such study, analysis, evaluation, review, or work,

- a. Identify by name, address and occupation the persons who conducted it.

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- b. State all facts regarding it including a detailed description of its nature, purpose, scope and findings.
- c. Identify all documents prepared in connection with it.
- d. Identify and summarize any oral reports made in connection with it.

INTERROGATORY NO. 6: Identify all studies, analyses, evaluations, reviews or other work regarding the design, construction, operation or reliability of the Ranney Collectors and any associated environmental impacts for the Skagit Nuclear Power Project known to you that have been or are being conducted, except those conducted for Applicants or the NRC Staff. With respect to each such study, analysis, evaluation, review or other work,

- a. Identify by name, address and occupation the persons who conducted it, and for whom the work was performed.
- b. State all facts regarding it including a detailed description of its nature, purpose, scope and findings.
- c. Identify all documents prepared in connection with it.
- d. Identify and summarize any oral reports made in connection with it.

INTERROGATORY NO. 7: Identify by name, address and occupation each person whom SCANP intends to call as a witness on the subject of availability of coal, especially British Columbia coal. As to each such person,

- a. Describe in detail all studies, analyses, evaluations or other work performed by that person on the referenced subject and for whom such work was performed.
- b. Identify all documents prepared by such person on the referenced subject.

INTERROGATORY NO. 8: With respect to the statement by Mr. Lued at the conference on April 24, 1979 (Tr. 11,849) that, "We are considering making a formal motion to the Board to reopen aquatic impacts in light of newly-available information,"

- a. Identify all such "newly-available information."
- b. Identify all documents regarding such "newly-available information."
- c. Describe in detail all studies, analyses, evaluations, reviews or other work regarding the aquatic impacts of operation of the Skagit Nuclear Power Project that

have been conducted, are being performed, or are planned, other than those for Applicants or the NRC Staff. Identify by name, address and occupation the persons who have done or will be doing such work. Identify the person or organization for whom any such work was, is or will be performed. Identify all documents that refer to or have been prepared in connection with such work.

INTERROGATORY NO. 9: Describe in detail all studies, analyses, evaluations, reviews or other work on the subjects of the suitability of the site for development of an evacuation plan or the adequacy of the emergency evacuation plan which have been or are being conducted by or for SCANP or its attorneys, agents, employees, consultants or other persons acting on its behalf. With respect to each such study, analysis, evaluation, review or work,

- a. Identify by name, address and occupation the persons who have conducted or are conducting it.
- b. State all facts regarding it including a detailed description of its nature, purpose, scope and findings.
- c. Identify all documents prepared in connection with it.

- d. Identify and summarize any oral reports made in connection with it.
- e. Identify by name, address and occupation all persons whom SCANP intends to call as witnesses on the subject of emergency evacuation plans.

INTERROGATORY NO. 10: Identify by name, address and occupation all persons whom SCANP intends to call as witnesses on the subject of financial qualifications of Applicants. As to each such person,

- a. Describe in detail all studies, analyses, evaluations, reviews, or other work performed by that person on the subject of financial qualifications of Applicants.
- b. Identify each and every document prepared by such person on the referenced subject.

INTERROGATORY NO. 11: Identify by name, address and occupation all persons whom SCANP intends to or may call as witnesses at hearings on Applicants' application for construction permits for the Skagit Nuclear Power Plant. As to each such person,

- d. Identify and summarize any oral reports made in connection with it.
- e. Identify by name, address and occupation all persons whom SCANP intends to call as witnesses on the subject of emergency evacuation plans.

INTERROGATORY NO. 10: Identify by name, address and occupation all persons whom SCANP intends to call as witnesses on the subject of financial qualifications of Applicants. As to each such person,

- a. Describe in detail all studies, analyses, evaluations, reviews, or other work performed by that person on the subject of financial qualifications of Applicants.
- b. Identify each and every document prepared by such person on the referenced subject.

INTERROGATORY NO. 11: Identify by name, address and occupation all persons whom SCANP intends to or may call as witnesses at hearings on Applicants' application for construction permits for the Skagit Nuclear Power Plant. As to each such person,

- a. Describe in detail the subject matter on which that person is expected to testify and the substance of his/her testimony.
- b. Describe in detail all studies, analyses, evaluations, reviews or other work performed by that person in connection with the subject matter on which he/she is expected to testify.
- c. Identify all documents prepared by that person or to be offered into evidence by that person on the subject matter on which he/she is expected to testify.

REQUEST FOR PRODUCTION NO. 1: Produce for inspection and copying by Applicants all documents which are identified in your answer to the preceding interrogatories.

REQUEST FOR PRODUCTION NO. 2: Produce for inspection and copying by Applicants all communications and other documents pertaining in any way to geology and seismology in relation to the Skagit Nuclear Power Plant that have passed between SCANP, its attorneys, agents, employees, consultants or any other persons acting on its behalf including, in particular, all communications and other documents that have passed between Dr. Eric S. Cheney and any of the following:

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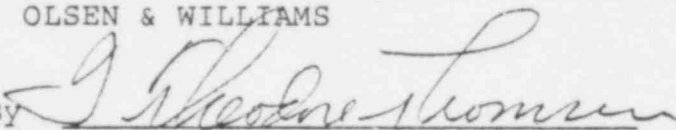
- A. L. C. Bennett, Jr.
- B. Timothy P. Lovseth
- C. P. R. Carroll
- D. William A. Brewer
- E. J. W. Murray
- F. W. G. Milne
- G. W. R. Schell
- H. R. S. Crosson
- I. Bruce A. Stoker
- J. Anthony Qamar
- K. R. H. Blunden
- L. John Whetten
- M. Fred Pessl
- N. Stewart Smith
- O. Steven Malone
- P. The NRC, its employees or consultants
- Q. The U.S. Geological Survey, its employees or consultants
- R. Any other person or organization, including without limitation, those situated in Canada.

DATED this 31st day of May, 1979.

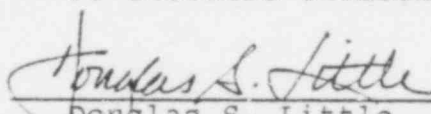
Respectfully submitted,

PERKINS, COIE, STONE,
OLSEN & WILLIAMS

By


F. Theodore Thomsen

By


Douglas S. Little

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

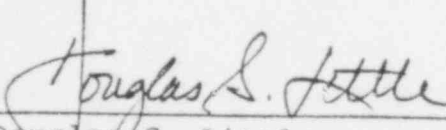
CERTIFICATE OF SERVICE

I hereby certify that the following:

APPLICANTS' INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO INTERVENOR SCANP

in the above-captioned proceeding have been served upon the
persons shown on the attached list by depositing copies thereof
in the United States mail on May 31, 1979 with proper
postage affixed for first class mail.

DATED: May 31, 1979



Douglas S. Little
Counsel for Puget Sound Power &
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Date: May 31, 1979

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