

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

ROBERT CARR, being first duly sworn, deposes and says:

I am employed by SCANP, and in that capacity I have had primary responsibility for contacting and coordinating presentations of expert witnesses who will testify on behalf of SCANP concerning geology and seismology issues.

The time schedule that has been imposed upon SCANP is, for many witnesses, impossible to meet and, for others, significantly detracts from the quality of review that they are able to provide. Below are examples of the unnecessary hardships imposed.

(1) The Applicant has not provided and will not provide a copy of the Western Geophysics Company's Seismic Reflection Data until October 17, 1979. Our witness Dr. John Millimon will not be allowed to review said data outside the offices of a Boston Law Firm. Still, a meaningful analysis, in the form of prefiled testimony, is required no later than October 18, 1979.

(2) SCANP received, from the Applicant, on October 11, prefiled testimony by Dr. Bolt and Dr. Newmark. Even though we forwarded this information to our witness Dr. Ellis, University of British Columbia, on October 12, we have been informed by him that it will be impossible to review either document prior to October 18. The search for an expert to

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Attachment 2

cover the Engineering aspect of Dr. Newmark's testimony has, just today, proved fruitful. Dr. Hartz and Dr. Sherif of the University of Washington may well wish to respond to this testimony but by no means can meet the October 18 deadline.

(3) Dr. Eric Cheney is in the process of completing his seventh revision to his Interim Report of the Seismic and Geologic Hazards to the Proposed Nuclear Power Site, Sedro Wolley, Wash.. He expects to finish within the time constraints but has informed me that the unnecessary schedule crunch has forced him to omit all review of testimony received after October 1, 1979. Furthermore, Dr. Cheney has not had the benefit of a response to interrogatories sent to the Applicant and to the Staff. These interrogatories were drafted primarily by Dr. Cheney in an attempt to facilitate review of the Staff and Applicant positions.

Apart from the specific examples listed above, it is my opinion that, as general proposition, the needless time constraints imposed upon the upcoming hearing have significantly hindered SCANP's opportunity to present a complete and meaningful analysis of the geologic and seismologic hazards involved in the proposed Skagit Nuclear Project.

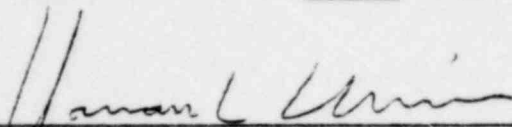
Respectfully,



Robert Carr

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SWORN and SUBSCRIBED to before me this 16 day of
October, 1979.



NOTARY PUBLIC in and for the
State of Washington, residing
at Seattle

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL 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))	
)	
)	

CERTIFICATE OF SERVICE

I hereby certify that copies of:

MOTION TO DIRECT CERTIFICATION, STAY PROCEEDINGS,
AND TO REVIEW ACTIONS OF THE LICENSING BOARD
(EXCEPT ATTACHMENTS 1, 2, 3, and 5. WHICH PRE-
VIOUSLY HAVE BEEN SERVED ON THE PARTIES)

dated October 16, 1979, have been served on the following
by depositing the same in the United States mail, postage
prepaid, on this 16 day of October, 1979.

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DATED: October 11, 1984

ROGER M. LEED

By Richard M. Sandvik

Certificate - 2

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