



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)	September 21, 1979
Units 1 and 2))	
)	

APPLICANTS' OBJECTION TO INTERVENOR SCANP'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION
TO APPLICANT DATED SEPTEMBER 14, 1979

On September 14, 1979, Intervenor SCANP sent a lengthy set of interrogatories and requests for production to Applicant Puget Sound Power & Light Company and its attorneys. This set of discovery concerns the subjects of geology and seismology.

Applicants object to Intervenor SCANP's Interrogatories and Requests for Production dated September 14, 1979 on several grounds. First, SCANP's discovery is untimely. The discovery was not served by the June 1, 1979 deadline for initial discovery request that was fixed at the April 24, 1979 conference. Tr. 11,945-949. Applicants note that Intervenor SCANP was able to comply with that deadline and did submit to Applicants a number of interrogatories and requests for production on the subjects of geology and seismology, dated May 24, 1979.

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Second, Applicants object to many of the questions because they call for additional work or studies by Applicants. For example, interrogatory number 8 calls for the preparation of new geologic maps, redrafted geologic cross sections, aeromagnetic contour maps, gravity contour maps and other maps. This set of discovery contains numerous other examples of requests for additional work or revised documents. In effect, SCANP seeks to have studies reperformed and data newly presented in a manner suitable to it. Such requests go beyond the proper scope of discovery.

Third, Applicants object to the burdensome nature of the interrogatories and requests for production. The interrogatories are extremely lengthy (continuing for some 88 pages) and seek a great amount of detail, some of which is of questionable materiality. An extensive and very time consuming effort would be required to answer the interrogatories. Preparation of answers would be by persons who are busy preparing themselves as witnesses for the upcoming hearing on geology and seismology. Therefore, answering this set of untimely discovery would prejudice Applicants' preparation for the final hearing.

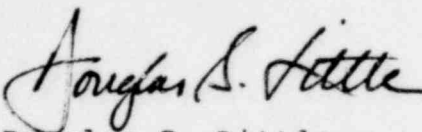
Finally, Applicants note that the questions, to the extent they are deemed relevant, and material, can

be pursued much more efficiently by means of cross examination of Applicants' witnesses at the upcoming hearing.

Dated: September 20, 1979.

Respectfully submitted,

PERKINS, COIE, STONE,
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By 

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In the Matter of)	
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PUGET SOUND POWER & LIGHT COMPANY,)	DOCKET NOS.
et al.)	
)	50-522
(Skagit Nuclear Power Project,)	50-523
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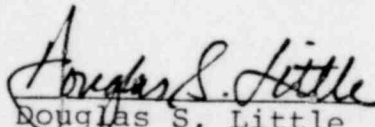
CERTIFICATE OF SERVICE

I hereby certify that the following:

APPLICANTS' OBJECTION TO INTERVENOR SCANP'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION
TO APPLICANT DATED SEPTEMBER 14, 1979

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 September 21, 1979 with proper
postage affixed for first class mail.

DATED: September 21, 1979



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