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October 25, 1979

Valentine B. Deale, Esq., Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
1001 Connecticut Avenue N.W.  
Washington, D.C. 20036

Re: Skagit Nuclear Power Project, Units 1 & 2  
Dockets No. STN 50-522, 50-523



Dear Chairman Deale:

As indicated in the October 16, 1979 letter of Richard Black, "certain individuals who advised the U.S.G.S. of the field work in the Skagit area . . . will be available if the Board or the parties so desire." Below is the list of such witnesses whom we request be called to testify:

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| 1. D. P. Dethier<br>1107 N.E. 45th St.<br>Suite 125<br>Seattle, WA 98105 | U.S.G.S expert on the pleistocene geology of the Skagit Valley, and co-author of U.S.G.S. Open File Report 79-1468   |
| 2. J.T. Whetten<br>1107 N.E. 45th St.<br>Suite 125<br>Seattle, WA 98105  | U.S.G.S expert on bedrock geology of the Skagit Valley, and co-author of U.S.G.S. Open File Report 79-1468   |
| 3. J. P. Minard<br>1107 N.E. 45th St.<br>Suite 125<br>Seattle, WA 98105  | U.S.G.S. expert who studied deformed lake sediments near Lake Cavanaugh and concluded that they were faulted. Apparently he has noted some discrepancies between what he found and what the Applicants later reported to have found. |

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| 4. H. D. Gower<br>U.S. Dept. of Interior<br>Geological Survey<br>Middlefield Road<br>Menlo Park, CAL 94025 | Has compiled the first and only<br>neotectonic map of Western<br>Washington (U.S.C.S. Open File<br>Report 78-426). |
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The following witnesses, although they may not have specifically advised the U.S.G.S. of their field work, have knowledge which is essential to facilitate an adequate understanding of the Skagit Valley geology and seismology. Witnesses Stepp, Ryan and Loveseth are not employees of the U.S.G.S., and will require formal subpoenas. As specified in 10 CFR Sec. 2.720(a), a showing of general relevance is included.

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| 1. Carl Stepp<br>Fugro, Inc., Consulting<br>Engineers & Geologists<br>3777 Long Beach Blvd.<br>Long Beach, CAL | Dr. Stepp is the chief geologist for the advisory report to Seattle City Light on the Copper Creek Dam. The relevance of this report is outlined in the prefilled testimony of Dr. Cheney. Briefly, the report predicts ground motions of .7g from an event similar to the 1872 earthquake.          |
| 2. Dr. Barry Ryan<br>Geophysics Department<br>University of British<br>Columbia<br>Vancouver, B.C.<br>Canada   | Dr. Ryan has worked on the Canadian portion of the Straight Creek - Fraser River Fault Zone. He has evidence that this fault cuts the Chilliwack Batholith and may well be active.   |
| 3. Timothy Loveseth<br>Narmco, Inc.<br>10546 West Sundance<br>Mt. Littleton, Colorado                          | Mr. Loveseth has evidence that the Devil's Mountain fault is a major fault and that it is connected to the Leech River fault on Vancouver Island.  |
| 4. J.C. Savage<br>U.S. Dept. of Interior<br>Geological Survey<br>345 Middlefield Rd.<br>Menlo Park, CAL 94025  | Dr. Savage is the authority on the 1946 earthquake. He has information which suggests with a 99% confidence level that surface deformation exists as a result of this earthquake. Compare the U.S.G.S. review team position, that no evidence exists to suggest that the 1946 earthquake is shallow. |

Valentine B. Deale, Esq., Chairman  
Atomic Safety and Licensing Board  
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5. C. Wentworth  
U.S. Dept. of Interior  
Geological Survey  
345 Middlefield Rd.  
Menlo Park, CAL 94025

Dr. Wentworth is in charge of neotectonic analysis of Washington. He is familiar with the standards for neotectonic mapping, standards which SCANP contends have not been met.

6. David L. Jones  
U.S. Dept. of Interior  
Geological Survey  
345 Middlefield Rd.  
Menlo Park, CAL 94025

Noted authority on West Coast geology and tectonics.

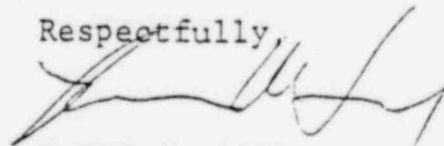
7. D. M. Boone  
U.S. Geological Survey  
345 Middlefield Rd.  
Menlo Park, CAL 94025

Seismologist, senior author of U.S.G.S. Circular 795 that evaluates strong ground motion of earthquakes. He has concluded that 0.35 is commonly exceeded by nearby earthquakes.

8. C. Blake  
U.S. Dept. of Interior  
Geological Survey  
345 Middlefield Rd.  
Menlo Park, CAL 94025

Ex-branch chief of Western Environmental Geology for U.S. Geological Survey. He has expressed grave doubts over the validity of concluding that 0.35g is an appropriate level for the safe shut-down earthquake at the Skagit Plant.

Respectfully,



ROGER M. LEED  
Counsel for SCANP

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cc: Service List

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