

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety & Licensing Board

---

In The Matter Of	)	
	)	
PACIFIC GAS & ELECTRIC COMPANY	)	Docket Nos. 50-275 OL
	)	50-323 OL
(Diablo Canyon Nuclear Power Plant,	)	
Units 1 & 2)	)	

---

INTERVENORS' REQUEST TO REPLY TO THE  
STAFF AND APPLICANT RESPONSE TO THE INTERVENORS' REQUEST  
FOR ISSUANCE OF LICENSING BOARD SUBPOENAS

Pursuant to 10 CFR §2.730(c), Intervenor SCENIC SHORE-  
LINE PRESERVATION CONFERENCE, INC., SAN LUIS OBISPO MOTHERS  
FOR PEACE, SANDRA SILVER, ECOLOGY ACTION CLUB and JOHN J.  
FORSTER request permission to reply to the Staff and Applicant  
responses to INTERVENORS' REQUEST FOR THE ISSUANCE OF LICENSING  
BOARD SUBPOENAS. This request is made because important  
legal questions are raised in both the Staff and Applicant  
responses which deserve to be addressed and because the  
Licensing Board's disposition of this motion will significantly  
shape the future course of this proceeding.

Respectfully submitted,

7810190267 G

2.

*David S. Fleischaker*

David S. Fleischaker, Esq.  
1025 Fifteenth Street, N.W.  
Suite 602  
Washington, D.C. 20005  
(202) 638-6070

John R. Phillips, Esq.  
Steven Kristovich, Esq.  
CENTER FOR LAW IN THE PUBLIC INTEREST  
10203 Santa Monica Drive  
Los Angeles, California 90067

Attorneys For Intervenors  
SCENIC SHORELINE PRESERVATION CONFERENCE, INC.  
SAN LUIS OBISPO MOTHERS FOR PEACE  
ECOLOGY ACTION CLUB  
SANDRA A. SILVER  
JOHN J. FORSTER

SEPTEMBER 28, 1978