

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board



10/6/78

In the Matter of	)	
	)	
PACIFIC GAS AND ELECTRIC COMPANY	)	Docket Numbers
	)	50-275 O.L.
(Diablo Canyon Nuclear Power Plant	)	50-323 O.L.
Units 1 and 2 )	)	

SUPPLEMENTAL MEMORANDUM IN SUPPORT OF  
INTERVENOR SAN LUIS OBISPO MOTHERS FOR PEACE  
APPEAL FROM ORDERS OF MAY 11, 1978, and SEPTEMBER 5, 1978,  
RELATIVE TO QUALIFICATION OF SECURITY EXPERTS:  
PETITION FOR DIRECT CERTIFICATION

INTRODUCTION

This Memorandum is filed as a supplement to INTERVENOR  
SAN LUIS OBISPO MOTHERS FOR PEACE APPEAL FROM ORDERS OF  
MAY 11, 1978, and SEPTEMBER 5, 1978 RELATIVE TO QUALIFICATION  
OF SECURITY EXPERTS filed on September 22, 1978, and amends  
Intervenor's appeal in that Intervenor seeks now direct  
certification and qualification only of David Dinsmore Comey  
as security expert for discovery purposes.

On May 23, 1978, the San Luis Obispo Mothers for Peace  
(SLOMFP) petitioned the Atomic Safety and Licensing Board to  
qualify David Dinsmore Comey as an expert witness to review  
for discovery purposes the Diablo Canyon security plan.

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This was the fourth attempt by Intervenor, commencing August 29, 1977, to qualify an expert witness in this proceeding under the guidelines established by this Appeal Board In the Matter of Pacific Gas and Electric Co. (Diablo Canyon, Units 1 and 2), ALAB-410, 2 NRR 30,197, 28,022, 28,0245-27, (1977). Pursuant to SLOMFP's petition of May 23, 1978, the parties deposed Mr. Comey on July 5, 1978, in Chicago, Illinois. On August 23, 1978, Intervenor SLOMFP petitioned the Board for an immediate order qualifying Mr. Comey as an expert witness for discovery purposes. In an order dated September 5, 1978, attached as Exhibit C, the Board denied Intervenor SLOMFP's petition.

In rejecting Mr. Comey as an expert witness, the Licensing Board did not follow the guidelines previously established by this Appeal Board in ALAB-410. Unless this Appeal Board acts now to review the Licensing Board's order, Intervenor SLOMFP will, in effect, be denied discovery of applicant's security plan and participation in this proceeding -- a right recognized by this Appeal Board in ALAB-410.

Intervenor SLOMFP now urges this Appeal Board to grant direct certification of this question pursuant to 10 CFR §2.718(i), 2.785(b); In the Matter of Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), ALAB-271, NRCI-75/5, 478 (May 21, 1975); and to issue an immediate order that Mr. Comey is qualified as an expert witness for discovery purposes.

## ARGUMENT

### I

#### THIS APPEAL BOARD SHOULD EXERCISE DISCRETIONARY POWER OF DIRECT CERTIFICATION TO REVIEW ASLB ORDER DENYING QUALIFICATION OF DAVID DINSMORE COMEY AS AN EXPERT WITNESS FOR DISCOVERY PURPOSES

- A. Certification is Appropriate and Necessary in This Instance to Further Clarify the Requirements Imposed on Intervenor to Qualify an Expert to Review and Testify Concerning Various Aspects of an Applicant's Security Plan.

This Appeal Board previously found it necessary to allow an interlocutory appeal in this same proceeding in order to provide guidance to the Licensing Board with regard to current standards governing disclosure of security plans. In deciding to certify that question, this Appeal Board properly perceived the issue of intervenor's discovery rights of security plans to have broad implications going beyond the particular facts of the case. Id. at 28,023. This Appeal Board generally recognizes that interlocutory appeals involving important questions of general applicability present appropriate circumstances for exercise of its certification powers. See, e.g., In the Matter of Toledo Edison Co., et al (David-Besse Nuclear Power Station), ALAB-300, 2 NRR 30,028, 27,181, 27,190 (1975).

This Appeal Board stated in its earlier decision on this issue: "It is our hope that these general principles

will provide sufficient guidance to enable the parties to agree on the scope of discovery to be permitted, both in terms of the particular information to be released and the persons to whom it is given. In the Matter of Pacific Gas and Electric Co. (Diablo Canyon Nuclear Power Plant, Units 1 and 2), ALAB-410, 2 NRR 30,197, 28,022, 28,026 (1977). The "general principles" have not proved adequate to guide the Licensing Board. Despite Intervenor SLOMFP's compliance with all requirements and guidelines regarding qualification of an expert, see Part II, infra, the Licensing Board continues to deny Intervenor SLOMFP any opportunity to participate in review of applicant's security plan.

The Licensing Board's interpretation of the Appeals Board's orders are tantamount to rulings that the following do not render an expert qualified to examine a security plan:

1. Experience with military security plans and direct professional experience in the psychology of aggressive human behavior (Dr. Welch).
2. A doctor degree in clinical psychology and recognized expertise on the psychology of human terrorist activities (Dr. DeNike).
3. Expertise in quality engineering and sixteen years of engineering experience in the nuclear industry (Mr. Hubbard).

4. Previous experience and recognized expertise in the area of nuclear powerplant sabotage (Mr. Comey).

If individuals with experience in military security, psychology of terrorism and aggressive human behavior, quality assurance and nuclear powerplant technology, and previous experience in evaluating nuclear powerplant security are not qualified as experts, your Intervenor submits that it is impossible to conceive of what would qualify an expert before the Atomic Safety and Licensing Board.

Direct certification is required to clarify just what is required to qualify an expert for discovery purposes in security matters.

B. Certification is Appropriate Here Because Normal Appellate Procedures are not Adequate and a Request to the Licensing Board to Certify Would be Futile and Would Only Act to Delay this Proceeding.

If the Licensing Board's order is allowed to stand, the hearings scheduled for December will proceed without opportunity for any Intervenor to present expert testimony regarding the adequacy of applicant's security plan. As shown above (pp. 3 and 4, supra), denying such opportunity to Intervenors could be detrimental to the public interest, and would be inconsistent with the result contemplated in this Appeal Board's previous ruling. In the Matter of Pacific Gas and Electric Co. (Diablo Canyon Nuclear Power Plant, Units 1 and 2); ALAB-410, 2 NRR 30,197, 28,022 (1977).

The inadequacy of providing relief through normal appeals procedures is one factor favoring exercise by this Appeal Board of its certification authority. See, id.; In the Matter of Kansas Gas and Electric Co. and Kansas City Power and Light Co., (Wolf Creek Nuclear Generating Station, Unit No. 1), ALAB-327, 2 NRR 30,067, 27,373, 27,376, (1967). This Appeal Board, therefore, should grant direct certification in this instance.

- C. The Licensing Board has Placed an Unreasonable Burden on Intervenor SLOMFP to Prove Mr. Comey's Expertise in Security Matters.

Intervenor SLOMFP fulfilled completely the requirements discussed in ALAB-410 with regard to establishing an expert's qualifications. See Intervenor SLOMFP's Petition for Immediate Order that David Dinsmore Comey is Qualified as a Security Expert for Discovery; Part II, infra. Yet the Licensing Board arbitrarily refused to recognize Mr. Comey's expertise. Without certification, the Licensing Board will continue to impose this unreasonable burden of proof on Intervenor SLOMFP and others in similar positions, thereby thwarting all attempts by an intervenor to participate in review of an applicant's security plan. In effect, the Licensing Board has achieved a de facto "classified information" status for the contents of applicant's



security plan through imposition of unreasonable requirements on Intervenor SLOMFP to qualify an expert in security matters. This Appeal Board expressly rejected the proposition that security plans be treated in the same manner as classified information. In the Matter of Pacific Gas and Electric Co. (Diablo Canyon, Units 1 and 2), ALAB-410, 2 NRR 30,197, 28,022, 28,024 (1977).

This Appeal Board further contemplated that the Licensing Board would approve an expert proposed by Intervenor in this proceeding, and allow such expert to review certain "sanitized" portions of applicant's security plan. Id. at 28,026. Instead, the Licensing Board has raised an unreasonable barrier to any review, by any expert, of the security plan. The Appeal Board should not allow this barrier to stand.

- D. Without Certification, the Public Interest Will Suffer Because the Board's Order Denying Qualification of Mr. Comey as an Expert Effectively Precludes any Participation by Intervenor SLOMFP, or any Other Intervenor, in the Review of the Adequacy of Applicant's Security Plan.

In the short time remaining to conduct discovery and prepare for the hearings now scheduled to begin in December, 1978, Intervenor SLOMFP will not be able to locate another qualified security expert and arrange for another deposition of any such proposed expert. In the case of Mr. Comey, more than three months passed between Intervenor SLOMFP's petition to the Board to accept Mr. Comey and the Board's denial of

that petition. Now there is no time for Intervenor SLOMFP to locate another expert and wait another three months for the Board's final determination. Therefore, unless the Appeal Board acts now to review the Licensing Board's order (Exhibit C), Intervenor SLOMFP loses completely the opportunity to participate in review of applicant's security plan.

There is no other intervenor in this proceeding qualified to review applicant's security plan.

This Appeal Board has recognized the great value to public health and safety of intervenor participation in review of the adequacy of an applicant's security plan. In the Matter of Pacific Gas and Electric Co. (Diablo Canyon, Units 1 and 2), ALAB-410, 2 NRR 30,197, 28,022, 28,024-25, 28,028-29 (1977); Consolidated Edison Co. of New York (Indian Point, Unit 2), ALAB-197 and 197R, 7 AEC 473, 826, on review, CLI-74-23, 7 AEC 947, 949-50, on remand, ALAB-243, 8 AEC 850, 853-54 (1974). This Appeal Board, in a previous ruling supporting the request by this Intervenor for discovery of applicant's security plan, explicitly noted that participation by an intervenor's expert in Indian Point 2 "helped . . . in assuring that the [security] plan eventually adopted for the plant was adequate." In the Matter of Pacific Gas and Electric Co. (Diablo Canyon, Units 1 and 2), ALAB-410, 2 NRR



30,197, 28,022, 28,024-25 (1977). As Mr. Salzman stated in his additional comments to the Appeal Board's Memorandum in ALAB-410: "[C]onsiderable benefit can be derived from the independent scrutiny of such [security] plans which litigation engenders." Id. at 28,029. [Emphasis added.]

II

INTERVENOR SLOMFP HAS ESTABLISHED THAT  
DAVID DINSMORE COMEY IS QUALIFIED TO ACT  
AS AN EXPERT WITNESS FOR DISCOVERY OF APPLICANT'S  
SECURITY PLAN

In his deposition, Mr. Comey established that he was qualified as an expert witness on security matters under the guidelines of ALAB-410:

1. Mr. Comey reviewed security plans under the terms of a protective order in 1974, inspected plant facilities, participated in negotiations of an in camera settlement agreement with respect to Donald C. Cook, Units 1 and 2, nuclear plant. (Depositions of David Dinsmore Comey, July 5, 1978, [hereafter "depo."] p. 6, l. 23 -- p. 8, l. 17).

2. Mr. Comey reviewed the security plans under the terms of a protective order in 1973, inspected facilities on the security plan for Zion, Units 1 and 2, Docket Nos. 50-295 and 50-304. (Depo. p. 8, l. 18-23). In reference to the relevant regulations applicable to that proceeding, Mr. Comey was qualified as a "2.733 expert". (Depo. p. 10, l. 1). He was examined by voir dire at the beginning of the in camera proceeding, (Depo. p. 10, l. 8-10), and ultimately was qualified by the Chairman to conduct cross-examination:

"Alright, the Board will rule. Mr. Comey will be permitted to cross-examine in areas indicated by his counsel. That, of course, will be subject to control of his counsel." (Depo. p. 11, l. 12-15).

3 Mr. Comey has testified on security plant matters in in camera sessions before the Advisory Committee on Reactor Safeguards on a number of occasions. (Depo., p. 14, l. 19 -- p. 15, l. 1).

4. Mr. Comey participated in numerous meetings with members of the United States Atomic Energy Commission and the U. S. Nuclear Regulatory Commission, who were conducting a special study to determine what safeguards levels the NRC ought to impose; safeguards including physical security plans for nuclear power plants. (Depo. p. 15, l. 19 -- p. 16, l. 24). Mr. Comey participated in a special review group on physical security and safeguards against terrorist attacks on nuclear facilities established by the Office of Technology Assessment for the purpose of going over a report on that subject that had been prepared by the Rand Corporation. (Depo., p. 20, l. 10 -- p. 21, l. 24). Mr. Comey was a member of the Nuclear Proliferation and Safeguards Advisory Panel of that group. (Depo., p. 22, l. 5-6).

5. Mr. Comey is currently writing a report on physical security and potentiality of nuclear sabotage of nuclear power plants, and has been participating in that work for the past nine months. (Depo. p. 23, l. 15-17).

6. Mr. Comey is familiar with the relevant literature on security matters, particularly with the implementation of 10 C.F.R. §73.55, (Depo., p. 24, l. 12-18) and has copies of NUREGS 0207, 0419, 0220 (Depo., p. 25, l. 3-6).

7. Mr. Comey made an extensive review of the literature on security systems in preparation for his deposition. A list of those materials was attached as Intervenor Exhibit 2 to the deposition, and as Exhibit 1 to Intervenor's Petition for Immediate Order. (See Exhibit "A" of Intervenor's Appeal of September 22, 1978.)

8. Mr. Comey is familiar with the qualifications and requirements, which were promulgated in 1974, for guards for nuclear plants. (Depo., p. 26, l. 18-22).

9. Mr. Comey is familiar with current research being conducted in the field of security systems, both by the contractors for ERDA and NRC, and groups such as Sandia Laboratories, Brookhaven National Laboratory, Oakridge National Laboratory, the Rand Corporation, BDM Corporation, and Mitre Corporation. (Depo., p. 27, l. 22 -- p. 28, l. 14.)

10. Mr. Comey is familiar with the use of fault-tree analysis in the development and identification of vital systems. He was able to describe the methodology of fault-tree analysis and what factors should be taken into account in such an analysis. ("You would first start off with what device or devices or types of devices you would use in order to initiate a rupture in the primary coolant pipe, what sort of mechanical or explosive devices were necessary, then consider such questions as portability, access, how many

persons would be needed, what routes they would use to gain access to the pipe, what entries they would come through, et cetera, et cetera.") (Depo., p. 29, l. 14-21.)

11. Mr. Comey was retained by the California Energy Commission as an expert witness and conducted a fault-tree analysis on breach of physical security for a nuclear plant. (Depo., p. 29, l. 22 -- p. 30, l. #6). Mr. Comey incorporated this analysis into testimony on sabotage considerations of the Sundesert plant in testimony delivered July 19, 1977, before the California Energy Commission. A copy of Mr. Comey's testimony in that proceeding is attached as Intervenor Exhibit 1 to the deposition, and is attached as Exhibit 2 to Intervenor's Petition for Immediate Order. (See Exhibit A of Intervenor's Appeal of September 22, 1978.)

12. Mr. Comey was able to describe some currently available perimeter detection systems, including microwave systems, seismic systems, magnetic systems, electromagnetic systems, all in some detail. (Depo., p. 30, l. 11 -- p. 32, l. 9.)

13. Mr. Comey has spent a great deal of time instructing others in the use of hand-held armaments. (Depo., p. 33, l. 17-19).

14. Mr. Comey effectively described the purpose of security at a nuclear plant: "To prevent either an intruder

or insider from compromising any of the safety systems such that a release of radioactivity to the environment could occur." (Depo., p. 34, l. 24 -- p. 35, l. 1). He is familiar with the defense in depth concept as applied to physical security. ("Basically you have an isolation zone and you have a perimeter defense, and you have a vital area defense, and then within the vital area you have various other administrative and physical configurations designed to prevent acts of sabotage or of damage from taking place.") (Depo., p. 35, l. 12-16).

15. Mr. Comey is familiar with practical considerations to be considered in the size of a guard force: ("One way of doing it is to use Lanchester equations. Simply to postulate a certain attack force . . .") (Depo., p. 36, l. 24 -- p. 37, l. 11). Mr. Comey knew what a central and secondary alarm station was. He knew the minimum number of guards required for the protection of a nuclear power reactor. (Depo., p. 37, l. 12 -- p. 38, l. 6). Mr. Comey described what protection should be provided for site specific information related to security systems. ("First of all, it ought to be kept under physical security. It should probably be kept in the confines of the security force . . .") (Depo., p. 38, l. 23 -- p. 39, l. 5). He is able to identify criteria that he would use to identify vital equipment areas in a nuclear power plant. (Depo., p. 39, l. 20 -- p. 40, l. 7).



16. Finally, Mr. Comey clearly understands that the function of a security expert in this case is to determine whether or not the security plan for this facility complies with the regulations of the Commission. (Depo., p. 41, l. 1-3).

All of Mr. Comey's obvious qualifications were arbitrarily dismissed by the Licensing Board in a single paragraph:

"The Board has considered the filings of the parties and the transcript of the deposition. The Board perceives Mr. Comey a layman who is familiar with some of the available literature. The Board also recognizes that there exists today not only a different climate from the days of the Zion and Cook proceedings but there now exists 10 CFR §73.55 and ALAB-410 plus peripheral ACRS concerns and the general rise in civil disobedience -- all of which cause this Board to approach this matter with extreme care." Order Relative to Intervenor's Petition to Qualify David Comey as a Security Expert, Sept. 5, 1978, p. 5.

The Licensing Board's dismissal of Mr. Comey as a "layman familiar with the literature" is a gross distortion of the record. Mr. Comey's deposition establishes that he has the knowledge, the skill, the experience, training and education required to be qualified as an expert under Rule 702, Federal Rules of Evidence.

This is not a reasoned analysis by the Board of the evidence of Mr. Comey's qualifications as an expert witness. The Board's order makes no definitive findings that reveal the Board's method of analysis for reaching the summary

rejection of the obviously-qualified Mr. Comey. The Board's order merely recites the Staff and PG&E arguments and says, in essence, "We agree"; a gross denial to this Intervenor of the elements of due process in administrative proceedings.

Worst of all, the reference to concerns about the "general rise in civil disobedience" is an absolute red herring. Is the Board implying that Mr. Comey has in some way contributed to that disobedience? Or that, if Mr. Comey were qualified as an expert, there would be a rise in civil disobedience? Is the Board saying that Mr. Comey is not qualified as an expert because he might disclose the plan to unauthorized persons? That has never been the contention of either the applicant or the staff in this proceeding. This Appeal Board has clearly established, and this Intervenor has clearly understood and agreed that any review of the security plan would be under the terms of a protective order. Mr. Comey has been scrupulous in protecting the confidentiality of security plans he has previously reviewed in other proceedings under protective orders. <sup>1/</sup>

The Licensing Board's legitimate concern about "civil disobedience" is irrelevant to the determination of Mr. Comey's qualification to be an expert witness in this proceeding.

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<sup>1/</sup> See, e.g., Mr. Comey's refusal to answer certain questions in his deposition because of the continuing protective orders. Depo. David Dinsmore Comey, July 5, 1978, p. 62.

### III

#### THE PUBLIC INTEREST WILL SUFFER IF THERE IS NO ANALYSIS BY OTHER THAN NRC STAFF FOR COMPLIANCE OF APPLICANT'S SECURITY PLAN WITH EXISTING NRC REGULATIONS

- A. This is the Time, Before the Plant Becomes  
Operational, to Review the Security Plan.

Obviously, the security plan must be fully operational if and when an operating license issues. If a license issues without discovery by the Intervenor who raises serious security contentions, the denial will be a matter of legal controversy in the future, with substantial risk that the Licensing Board's arbitrary order will be overturned and discovery granted in the future -- under circumstances that could result in interruption of plant operations. Analysis of the security plan now, before operations, avoids that risk.

- B. NRC Staff Alone Cannot Effectively Review Compliance  
of Applicant's Security Plan With Regulation,  
Drawn by the Staff.

In reviewing whether the Applicant has met the requirements 10 CFR 73.55, NRC staff is, in effect, simultaneously reviewing the Applicant's performance, and also passing on its own work product. Because the staff who review the security plan at a given facility are evaluating the plan against criteria that they, themselves, have drawn up, there is a possibility of inadequate scrutiny. This Board and the

Commission have recognized the value of intervenor participation and that "considerable benefit can be derived from the independent scrutiny of such plans which litigation engenders."

(ALAB-410, p. 26.) The value of having an independent outside observer come in and look at whether or not the security plant for the facility meets the current regulations presents an enormous additional advantage to traditional staff review. Because the Intervenor has no particular stake in defending the regulations, the Intervenor's expert witness may be capable of spotting deficiencies that NRC staff might miss.

Secondly, personnel or the NRC staff who are assigned to deal with security, are not necessarily people who have knowledge of specific acts of sabotage or strategic or tactical operations where actual assaults have been made. Having an expert witness who has personally studied nuclear plant security systems,<sup>2/</sup> and has current knowledge of breaches of those systems,<sup>3/</sup> as Mr. Comey has, would bring a source of expertise to the Diablo Canyon security plan that may not be available on the NRC staff.

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2/ Mr. Comey has been writing a proprietary report on physical security and potentiality of nuclear sabotage of nuclear power plants. Depo., David Dinsmore Comey, July 5, 1978, p. 23.

3/ Mr. Comey regularly receives inspection and enforcement reports, including security violations, from each of the five regions, and keeps a log of all security violations and infractions that have occurred at licensed facilities Depo., David Dinsmore Comey, July 5, 1978, p. 66.

- C. In Arbitrarily Denying Expert Qualifications of Intervenor's Witness the NRC has Denied the Opportunity of Evaluating Applicant's Security Plan in Light of Independent and Objective Expert Testimony as to Vulnerability of the Reactor to Sabotage; the Methods by Which Sabotage Could Occur; the Threat Levels that Should be Considered.

Mr. Comey has reviewed security plans of other nuclear plants, and participated in other NRC security proceedings, and security plans have been modified as a result of his input. <sup>4/</sup> He is experienced and knowledgeable. In his testimony before the California Energy Commission (Exhibit 1 to Mr. Comey's deposition; Exhibit 2 to Intervenor's Petition for Immediate Order), Mr. Comey outlines why a reactor is vulnerable to sabotage. For example, he notes <sup>5/</sup> that planting of less than forty (40) pounds of shaped explosive charge at less than ten (10) locations in a nuclear plant could result in loss of the ultimate heat sink and consequent meltdown of the reactor. He further notes that entry to the plant by armed intruders is not unlikely, and that availability of specific piping and instrumentation drawings in NRC Public Documents Rooms makes such a threat entirely possible.

The Diablo Canyon nuclear plant, with open ocean access and remote location on the coast, is particularly vulnerable to sabotage. The long isolated access road lends itself to

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<sup>4/</sup> Modifications were made in the security plan of Donald C. Cook, Units 1 and 2, as a result of Mr. Comey's participation. Deposition of David Dinsmore Comey, July 5, 1978, p. 6.

<sup>5/</sup> Testimony of David Dinsmore Comey before the California Energy Commission, July 17, 1977, p. 10-12.

ambush of personnel going to, or coming from, the plant. An attack force, by helicopter or from open sea, would not be visible from the main highway.

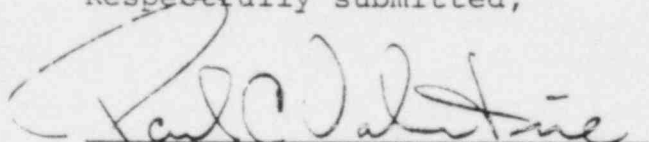
No serious and knowledgeable reader of Mr. Comey's deposition and testimony before the California Energy Commission would doubt his expert qualifications on security matters, and his ability to consider possible security breaches and inadequacies in the security plan that may not have occurred to staff. Given the peculiar vulnerability of the Diablo Canyon plant to acts of sabotage, it is clearly in the public interest that all available expertise be brought to bear in review of this plan.

#### CONCLUSION

For the reasons stated herein, Intervenor SLOMFP requests that this Appeal Board exercise direct certification of this matter and order that David Dinsmore Comey is qualified to serve as Intervenor's expert witness for discovery purposes on security matters.

DATED: October 6, 1978

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Paul C. Valentine", is written over a horizontal line.

PAUL C. VALENTINE  
YALE I. JONES

Attorneys for Intervenor:  
San Luis Obispo Mothers  
for Peace



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal



In the Matter of )  
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PACIFIC GAS AND ELECTRIC CO. ) Docket Nos. 50-275 O.L.  
 ) 50-323 O.L.  
(Diablo Canyon Nuclear Power Plant, )  
Units 1 and 2 )  
 )

CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of October, 1978, served copies of the SUPPLEMENTAL MEMORANDUM IN SUPPORT OF INTERVENOR SAN LUIS OBISPO MOTHERS FOR PEACE APPEAL FROM ORDERS OF May 11, 1978, and September 5, 1978, RELATIVE TO QUALIFICATION OF SECURITY EXPERTS: PETITION FOR DIRECT CERTIFICATION upon all of the parties listed below by depositing copies thereof in the United States Mail, first-class, postage prepaid.

Mrs. Raye Fleming  
1920 Mattie Rd.  
Shell Beach, CA 93449

Bruce Norton, Esq.  
3216 N. Third St.,  
Suite 202  
Phoenix, Arizona 85012

Arthur C. Gehr, Esq.  
Snell & Wilmer  
3100 Valley Center  
Phoenix, Arizona 85073

Philip A. Crane, Esq.  
John C. Morrissey, Esq.  
Pacific Gas & Electric Co.  
77 Beale St., Rm. 3127  
San Francisco, CA 94106

Janice E. Kerr  
Lawrence Q. Garcia, Esq.  
J. Calvin Simpson, Esq.  
California Public Utilities Commission  
5246 State Bldg.  
350 McAllister  
San Francisco, CA 94102

John Phillips, Esq.  
Center for Law in the Public Interest  
10203 Santa Monica Dr.  
Los Angeles, CA 90067

Mrs. Sandra Silver  
1792 Conejo Avenue  
San Luis Obispo, CA 93401

Mr. Frederick Eissler  
Scenic Shoreline Preservation  
Conference, Inc.  
4623 More Mesa Dr.  
Santa Barbara, CA 93105

Mrs. Elizabeth Apfelberg  
1415 Cozadero  
San Luis Obispo, CA 93401

James R. Tourtellotte, Esq.  
Office of the Executive Legal Director  
BETH 042  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. William E. Martin  
Battelle Memorial Institute  
Columbus, Ohio 43201

Docket and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Glenn Bright  
Atomic Safety & Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Elizabeth Bowers  
Chairman  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Alan S. Rosenthal, Esq.  
Chairman  
Atomic Safety and Licensing  
Appeal Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

  
Helen J. Donovan