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RELATED CORRESPONDENCE

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USNRC  
February 19, 1993

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

Pacific Gas and Electric Company

(Diablo Canyon Nuclear Power  
Plant, Units 1 and 2)

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Docket Nos. 50-275-OLA - Z  
50-323-OLA  
(Construction Period  
Recovery)

PACIFIC GAS AND ELECTRIC COMPANY'S  
FIRST SET OF INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS

Pursuant to 10 C.F.R. §§ 2.740, 2.740b, and 2.741, as modified by the Atomic Safety and Licensing Board's February 9, 1993, Memorandum and Order regarding discovery and hearing schedules, Pacific Gas and Electric Company ("PG&E") hereby requires the San Luis Obispo Mothers for Peace ("MFP") to respond to the following interrogatories and produce the documents requested below.

INSTRUCTIONS AND DEFINITIONS

- A. Each interrogatory should be answered separately. The responses shall include all pertinent information known to MFP, as defined below.
- B. Each interrogatory shall be answered fully, in writing, under oath or affirmation. To the extent that MFP does not have specific, complete, and accurate information

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with which to answer any interrogatory, MFP should so state, and the interrogatory should be answered to the extent information is available.

- C. Requests for documents should be answered by providing a list, organized by request number, identifying all documents responsive to the request. In addition, MFP should produce a copy of each document requested. The copy should be in the form and condition in which the document exists on the date of service of this request, and shall include all comments, notes, remarks, and other material (including handwriting) that may have been added to the document after its initial preparation. Documents produced in response to the requests below should be mailed to the undersigned counsel for PG&E.
- D. The word "document" as used herein means any written matter, whether produced, reproduced or stored on paper, cards, tapes, disks, belts, charts, film, computer storage devices or any other medium and shall include, without limitation, books, reports, studies, statements, speeches, notebooks, agreements, appointment calendars, working papers, manuals, memoranda, notes, procedures, orders, instructions, directions, records, correspondence, diaries, plans, diagrams, drawings, periodicals, lists, telephone logs, minutes, and

photographs, and shall also include, without limitation, originals, copies (with or without notes or changes thereon) and drafts.

E. "MFP" means in the context of this discovery request: The San Luis Obispo Mothers For Peace, or any of its agents, employees, consultants, contractors, technical advisors, representatives or other persons acting for or on behalf of all or any of them, or at their direction and control, or in concert with or assisting them -- whether paid or unpaid.

F. "Identify" when used in reference to a natural person means to set forth the following:

- a. name;
- b. last known residential address;
- c. last known business address;
- d. current or last employer;
- e. title or position;
- f. area of responsibility; and
- g. office held in MFP or business, professional, or other relationship with MFP.

G. "Identify" when used in reference to a document means to set forth the following:

- a. its title;

- b. its subject matter;
  - c. its date;
  - d. its author;
  - e. its addressee;
  - f. its files designation or other identifying designation; and
  - g. its present location and present custodian.
- H. The words "and" and "or" shall be construed either conjunctively or disjunctively so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.
- I. Wherever appropriate, the singular form of a word shall be interpreted in the plural, and vice versa, so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.
- J. If MFP objects to any interrogatory or document request, in whole or in part, or seeks to withhold documents or information because of the alleged proprietary or other nature of the data, please set forth all reasons and the underlying factual basis for the objection in sufficient detail to permit the Atomic Safety and Licensing Board to determine the validity of the objection. This

description by MFP should include with respect to any document: (1) author, addressor, addressee, and recipients of indicated and "blind" copies, together with their job titles; (2) date of preparation; (3) subject matter; (4) purpose for which the document was prepared; (5) all persons to whom distributed, shown, or explained; (6) present custodian; (7) all persons believed to have a copy of the document; and (8) the nature of the objection asserted.

K. For any document or part of a document that was at one time, but is no longer, in MFP's possession, custody, or control, or which is no longer in existence, or which cannot be located or produced, identify the document, state where and how it passed out of existence or why it can no longer be located and the reasons therefore, and identify each person having knowledge concerning such disposition or loss and the contents of the document, and identify each document evidencing its prior existence and/or any fact concerning its nonexistence or loss.

L. These interrogatories and document requests shall be continuing in nature as required by 10 C.F.R. § 2.740(e). Thus, any time MFP obtains information that renders any previous response incorrect or incomplete, or which indicates that a response was incorrect or incomplete

when made, MFP must supplement its previous response. Such supplements should be provided in a timely fashion.

INTERROGATORIES/REQUESTS FOR DOCUMENTS

- A-1 Identify the name, profession, employer, and area of professional expertise of each person whom MFP expects to call as a witness, including any expert witness, at the hearing on this matter.
- A-2 Identify the contentions relating to which and specific to the subject matter on which each witness is expected to testify at the hearing.
- A-3 Identify all documents, and all pertinent pages or parts thereof, that each witness has been shown to date and any other documents the witness will rely upon or will otherwise use for his/her testimony at the hearing.
- A-4 Provide copies of all documents identified in response to A-3 above that are not documents provided to MFP by PG&E and that are not otherwise available to PG&E.
- A-5 Identify the educational and professional experience of each witness identified in A-1 above.

A-6 Identify all persons known to MFP, and with whom MFP will consult or rely, or with whom MFP has consulted or relied upon, regardless of whether they will be called as a witness, who have knowledge with respect to Contentions I and V, as admitted in the Licensing Board's Prehearing Conference Order, dated January 21, 1993, (and as clarified in the Memorandum and Order dated February 9, 1993).

A-7 With respect to all persons identified in response to A-6 above:

A-7.1 Describe the nature of each communication, conversation, or consultation with such individual, and when it occurred.

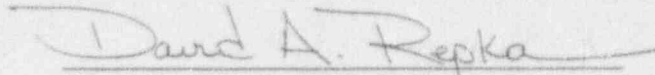
A-7.2 Describe all information received from such individual.

A-7.3 Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence or other communication with such individual.

A-7.4 Provide a copy of any document identified in response to A-7.3



Respectfully submitted,

A handwritten signature in cursive script that reads "David A. Repka". The signature is written in dark ink and is positioned above the typed names.

Joseph B. Knotts, Jr.

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Kathryn M. Kalowsky

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Attorneys for Pacific Gas and  
Electric Company

Dated at Washington, D.C.  
this 19th day of February, 1993.



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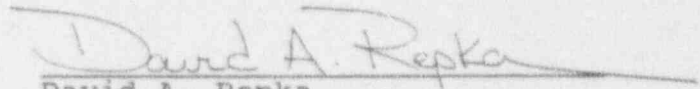
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(Construction Period  
Recapture)

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