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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
Charles Bechhoefer, Chairman
Jerry R. Kline
Frederick J. Shon

In the Matter of
Pacific Gas and Electric Company
Diablo Canyon Nuclear Power Plant
Units 1 and 2
Facility Operating Licenses
No. DPR-80 and DPR-82

Docket Nos. 50-275-OLA-2
50-323-OLA-2
ASLBP No. 92-669-03-OLA-2

March 22, 1993

San Luis Obispo Mothers for Peace
Response to First Set of Interrogatories
and Request for Production of Documents
Filed by Pacific Gas and Electric Company
and Motion for Protective Order

San Luis Obispo Mothers for Peace ("SLOMFP") herein responds to Pacific Gas and Electric Company's ("PG&E") first set of interrogatories and request for production of documents filed February 19, 1993.

Answers to Interrogatories

Interrogatory 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.

Answer: The SLOMFP has not yet determined the witnesses that will be called at the hearing. SLOMFP understands that it is under the obligation to update responses to PG&E's interrogatories and intends to do so.

Interrogatory 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.

Answer: Refer to answer to interrogatory A-1.

Interrogatory 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.

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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.

Answer: Refer to answer to interrogatory A-6.

Respectfully submitted,

Nancy Culver

Nancy Culver, President
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Certificate of Service

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I hereby certify that copies of the foregoing San Luis Obispo Mothers for Peace Response to First Set of Interrogatories and Request for Production of Documents Filed by Pacific Gas and Electric Company and Motion for Protective order have been served upon the following persons by U.S. mail, first class.

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Dated March 22, 1993, San Luis Obispo County, CA
Jill ZamEk

