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SAN LUIS OBISPO MOTHERS FOR PEACE '93 APR 29 P4:06
before the
ATOMIC SAFETY AND LICENSING BOARD

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

April 26, 1993

San Luis Obispo Mothers for Peace
Motion for Extension of Time to Examine Documents
at Diablo Canyon Nuclear Power Plant

Although the deadline for discovery ended on April 12, 1993, the San Luis Obispo Mothers for Peace ("SLOMFP") finds it necessary to request an extension of time to examine specific documents at the Diablo Canyon Nuclear Power Plant ("DCNPP"). SLOMFP needs additional time to view documents that are responsive to its First Set of Written Interrogatories and Request for Production of Documents to Pacific Gas and Electric Company ("PG&E") (February 16, 1993) because the initial opportunity to examine documents at the plant site on March 16, 1993 was not sufficient. Additionally, SLOMFP needs additional time to view documents that are responsive to its Second and Third Sets of Written Interrogatories and Request for Production of Documents to PG&E (March 8, 1993). The Board's Order provided an opportunity to request such an extension for good cause shown. SLOMFP has good cause for the reasons stated below.

1) On April 13, 1993, SLOMFP received two documents: PG&E Response to Second Set of Written Interrogatories and Requests for the Production of Documents Filed by SLOMFP (April 12, 1993) and PG&E Response to Third Set of Written Interrogatories and Requests for the Production of Documents Filed by SLOMFP (April 12, 1993). PG&E states that SLOMFP may view specific documents at the site prior to April 12. (Response to Second Set

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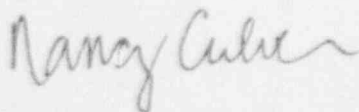
at 7 and 16.] PG&E knew that this would be an impossibility, given the fact that SLOMFP would receive the responses to SLOMFP interrogatories and requests for documents after the April 12 deadline. If PG&E chooses to have representatives from SLOMFP go to the site to view documents rather than copy and mail them, PG&E must provide the opportunity. SLOMFP therefore requests an extension of time to view and copy documents at DCNPP.

2) PG&E continues to belittle the SLOMFP for its manner of conducting discovery at the DCNPP. PG&E's Opposition to Request for Additional Discovery Re Cables (April 19, 1993) at 11. Yet PG&E was there and was witness to SLOMFP efforts and PG&E's disorganized, time-consuming and ineffective methods of providing SLOMFP with documents. For the record, SLOMFP notes that when its three representatives arrived at 9:45 on the morning of March 16, 1993 to view the documents that were noted as being responsive to SLOMFP First Set of Written Interrogatories and Requests for Production of Documents (February 16, 1993), **no documents were ready or available to examine.** PG&E had the SLOMFP write down specific document requests; SLOMFP then had to wait long periods of time for the documents to be located and then delivered. Of the five hours that the three SLOMFP representatives spent at the site, approximately 2 1/2 hours were spent waiting for documents. Furthermore, at the site, SLOMFP requested **all** of the NCRs and LERs that were listed as responsive to Interrogatories 12 and 19 and Document Request 22 on Attachment 2 in PG&E's Response to First Set of Interrogatories and Request for Production of Documents Filed by SLOMFP (Re: Contention 1) (March 12, 1993). Of the 93 NCRs listed, PG&E provided the SLOMFP with only 8. Of the 29 LERs listed, PG&E provided SLOMFP with

20. SLOMFP requested these documents in its Motion to Compel PG&E to Respond to the First Set of Interrogatories and Requests for the Production of Documents [Re: Contention 1] [March 24, 1993] at 5. SLOMFP requests either that PG&E provide these and other documents or another opportunity to examine and copy them at the site. Additionally, SLOMFP requests that these documents be ready and available for viewing when representatives from SLOMFP arrive at the plant site. SLOMFP intends to provide PG&E with a list of requested documents prior to the visit.

3) The proposed license amendment in question would not become effective until the year 2008. SLOMFP does not understand the extraordinary hurry to get through the discovery phase of this proceeding. Discovery was very short. And during that time, a lot had been required; SLOMFP was working on discovery requests, various motions and three late-filed contentions. Given the circumstances, SLOMFP requests additional time to continue to examine documents at the plant site.

SLOMFP is agreeable to viewing these documents at the site or at PG&E's office in San Luis Obispo. SLOMFP would also agree to provide a list of document requests; PG&E can then copy and mail them to SLOMFP. If PG&E chooses to have SLOMFP examine documents at the site or at its office rather than copy and mail them, SLOMFP proposes May 4, 5 and/or 6, 1993 as dates to do so. SLOMFP reiterates that it will provide a list of document requests to PG&E prior to May 4 and expects that these documents will be ready and available to the SLOMFP representatives when they arrive. Respectfully submitted,



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Certificate of Service

I hereby certify that copies of the foregoing San Luis Obispo Mothers for Peace ("SLOMFP") Motion for Extension of Time to Examine Documents at Diablo Canyon Nuclear Power Plant and Intervenor SLOMFP Reply to Pacific Gas and Electric Company's ("PG&E") Motion to Strike in Part SLOMFP Filing Regarding Addendum to FES and Intervenor SLOMFP Motion to Compel PG&E to Respond to the Second and Third Sets of Interrogatories and Requests for Production of Documents Filed by SLOMFP and Intervenor SLOMFP Motion to Compel the NRC Staff to Respond to the First Set of Interrogatories and Request for the Production of Documents Filed by SLOMFP and SLOMFP Motion for Leave to Reply to PG&E's Opposition to Additional Discovery Re: Cables have been served upon the following persons by U.S. mail, first class.

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Dated April 26, 1993, San Luis Obispo County, CA