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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

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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

April 26, 1993

Intervenor San Luis Obispo Mothers for Peace
Motion to Compel the NRC Staff to Respond
to the First Set of Interrogatories and Request for the
Production of Documents Filed by San Luis Obispo Mothers for Peace

On March 8, 1993, the San Luis Obispo Mothers for Peace ("SLOMFP") filed its First Set of Written Interrogatories and Requests for the Production of Documents to the NRC Staff. The NRC Staff filed its response on April 12, 1993: NRC Staff's Response to SLOMFP's First Set of Interrogatories and Request for the Production of Documents. In this document, the NRC Staff objects to some requests or provides insufficient answers. For reasons provided below, SLOMFP moves that the Atomic Safety and Licensing Board enter an Order compelling the NRC Staff to answer certain of SLOMFP's interrogatories and requests for documents.

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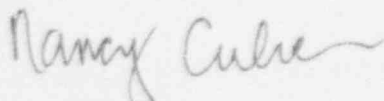
Interrogatory 4: SLOMFP requests information on the reliability of fire watch personnel. The NRC Staff objects to this request as being overly broad, unduly burdensome and unnecessary because this information is publically available. But SLOMFP believes that this is an extremely reasonable request and should be answered. This information is not reasonably obtainable through other means. Furthermore, this information is highly relevant to the proceeding because the utility is relying on fire watches to compensate for a faulty fire barrier material.

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Interrogatory 5: SLOMFP requests NRC staff inspections and/or evaluations of the fire watch program implemented by Pacific Gas and Electric Company ("PG&E") at Diablo Canyon Nuclear Power Plant ("DCNPP"). The NRC Staff finds it unduly burdensome to list all inspection reports from the time the plant began operation. So, SLOMFP has been provided with six inspection report numbers and dates which dated back to July 1991. This partial list is insufficient. The SLOMFP believes this to be a reasonable request. SLOMFP expects that this information is organized in such a fashion that this request is not burdensome - especially since the plant has only been in operation since 1984.

Interrogatory 7: The NRC Staff objects to SLOMFP's request for summaries of NRC Staff position on the contentions admitted by the Board in this proceeding. The NRC Staff claims that this information is available in pleadings and public documents. But these documents were written before the contentions were admitted. Now that these contentions have been admitted, SLOMFP requests knowledge of the NRC Staff position of these contentions based on their merits. SLOMFP believes this to be a reasonable request.

Respectfully Submitted,



Nancy Culver, President
San Luis Obispo Mothers for Peace
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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