

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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In the Matter of)

PACIFIC GAS AND ELECTRIC COMPANY)

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

Docket Nos. 50-275 O.L.
50-323 O.L.

MOTION FOR LEAVE TO
FILE REPLY

The Joint Intervenors hereby move this Board for leave to file the attached reply to PGandE's Answer in Opposition to Motion to Augment or, in the Alternative, to Reopen the Record ("Motion to Augment").

On February 14, 1984, the Joint Intervenors filed the above-referenced Motion to Augment. On February 22, 1984, in a conference call with all counsel, the Board established a schedule for responses and indicated that any reply by the Joint Intervenors, if deemed necessary, should be filed promptly upon receipt of the responding papers. On motion of the Staff, the schedule was extended to permit the filing of their response on March 15, 1984.

Because of the number of matters raised by PGandE in its Answer to the motion, the Joint Intervenors deem it necessary to submit the attached reply. Consistent with the Board's suggestion, and in order to ensure timely consideration of their

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reply, the Joint Intervenors are filing it simultaneously with scheduled filing by the Staff. Consequently, this filing is plainly timely and will result in no delay in the Board's consideration of the motion. To the contrary, it should facilitate the Board's review by focusing many of the contested issues.^{1/}

For the reasons stated, the Joint Intervenors respectfully request that leave to file be granted.

Dated: March 15, 1984

Respectfully submitted,

JOEL R. REYNOLDS, ESQ.
JOHN R. PHILLIPS, ESQ.
ERIC HAVIAN, ESQ.
Center for Law in the
Public Interest
10951 W. Pico Boulevard
Los Angeles, CA 90064
(213)470-3000

DAVID S. FLEISCHAKER, ESQ.
P. O. Box 1178
Oklahoma City, OK 73101

By


JOEL R. REYNOLDS

Attorneys for Joint Inter-
venors
SAN LUIS OBISPO MOTHERS FOR
PEACE
SCENIC SHORELINE PRESERVATION
CONFERENCE, INC.
ECOLOGY ACTION CLUB
SANDRA SILVER
ELIZABETH APFELBERG
JOHN J. FORSTER

^{1/} Obviously, because of the need for filing on the date the Staff's brief is due, the Joint Intervenors' reply cannot address the Staff's response. It is limited, therefore, to the matters raised by PGandE in its Answer.

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of March, 1984, I
have served copies of the foregoing MOTION FOR LEAVE TO FILE
REPLY, mailing them through the U.S. mails, first class, postage
prepaid, to the attached list.



Christina T. Concepcion

SERVICE LIST

Nunzio Palladino, Chairman
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Victor Gilinsky, Commissioner
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Thomas Roberts, Commissioner
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

*Thomas S. Moore, Chairman
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

*Dr. John H. Buck
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

*Lawrence Chandler, Esq.
Office of the Executive Legal Director - BETH 042
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

David S. Fleischaker, Esq.
Post Office Box 1178
Oklahoma City, OK 73101

*Bruce Norton, Esq.
Norton, Burke, Berry & French
2002 E. Osborn
Phoenix, AZ 85064

*Malcolm H. Furbush, Esq.
Vice President & General Counsel
Philip A. Crane, Esq.
Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94106]

James Asselstine, Commissioner
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Frederick Bernthal, Commissioner
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

*Dr. W. Reed Johnson
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

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

John Van de Kamp, Attorney General
Andrea Sheridan Ordin, Chief Attorney General
Michael J. Strumwasser,
Special Counsel to the Attorney General
Office of the Attorney General
State of California
3580 Wilshire Boulevard, Suite 800
Los Angeles, CA 90010

Richard B. Hubbard
MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, CA 95125

Virginia and Gordon Bruno
Pecho Ranch
Post Office Box 6289
Los Osos, CA 93402

*Sandra and Gordon Silver
1760 Alisal Street
San Luis Obispo, CA 93401

Carl Neiburger
Telegram Tribune
Post Office Box 112
San Luis Obispo, CA 93402

Tom Devine
Government Accountability Project
1901 Que Street, N.W.
Washington, D.C. 20009

Eric Havian, Esq.
Heller, Ehrman, White & McAuliffe
44 Montgomery Street., 31st Floor
San Francisco, CA 94133

* Via Express Mail/Federal Express