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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 )  
(Stanislaus Nuclear Project, ) NRC Docket No. P-564A  
Unit No. 1) )

FIRST SET OF SUPPLEMENTAL INTERROGATORIES  
PROPOUNDED TO PGandE BY NCPA

TO PGandE AND ITS COUNSEL OF RECORD:

Pursuant to the ruling of the Atomic Safety and Licensing Board on December 1, 1977 (Tr. 1005), Northern California Power Agency and its members hereby serve the following interrogatories upon Pacific Gas and Electric Company to be answered fully and separately in writing and under oath on or before October 10, 1978, as provided in Rule 2.740(b) of the Rules of Practice of the Nuclear Regulatory Commission.

I. INSTRUCTIONS

A. These interrogatories shall be deemed continuing, so as to require additional answers if further information is obtained between the time the answers are served and the discovery termination date established by the Board. Such additional answers shall be served from time to time but no later than thirty (30) days after such additional information is received.

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B. For each interrogatory, section or sub-section of said interrogatory which you refuse to answer under a claim of privilege, separately state the grounds for said claim.

## II. DEFINITIONS

A. "PGandE" refers to Applicant Pacific Gas and Electric Company, its successors, predecessors, subsidiaries, affiliates, assignees, divisions, and any other entities providing electric service at wholesale or resale, the stock or assets of which have been acquired by PG&E including its present and former officers, directors, agents, employees and all other persons acting or purporting to act on behalf of PG&E or such successors, predecessors, subsidiaries, affiliates, assignees, divisions, other entities, officers, directors, agents, employees, and other persons.

B. The words document or documents refers to all writings and matter of any kind, including drafts and copies not identical to the originals, and all graphic matter, photographic matter, sound reproductions or computer data files, tapes, inputs or outputs, however produced or reproduced, of every kind and description, in the actual or constructive possession, custody, care or control of PG&E, whether or not prepared by PG&E.

C. The words person or persons include natural persons, firms, partnerships, associations, joint ventures, unit operations or corporations or any other legal entity.

D. "NCPA" means the Northern California Power Agency, or its members, associate members, officers, employees, agents, attorneys and consultants, and its predecessors, including, but not limited to, the Northern California Municipal Electric Association ("NCMEA"), or any of them.

E. "Security organization" is an organization comprised of one or more persons whose function is to gather information about persons without such persons necessarily being aware that such information is being gathered. The definition of "security organization" is intended to include any internal organization or organizations within PGandE which perform the function of a "security organization", as well as organizations whose members are not employed directly by PGandE.

F. "State your contention" means state all your contentions with respect to the issue addressed in the interrogatory and as to each such contention separately: (1) state all facts upon which you base your contention; (2) identify all documents on which you rely to support your contention; (3) identify all documents which rebut or tend to rebut your contention; (4) state the name and address of each person who has knowledge of the basis of your contention or whom you may call to testify in support of your contention; and, (5) if you will do so without a motion to produce, attach a copy of said document to your answer, otherwise separately identify the person from whom each document may be

obtained.

G. "Identify all documents" means state the PGandE discovery document number and the Department of Water Resources discovery document number, or, if unnumbered, the title, date, author and addressee of the document.

H. Please answer each of the succeeding questions. If a security organization performs no function for PGandE other than investigation of those persons who have applied to PGandE for a job, please state that fact in response to Interrogatory 3.c., and no further interrogatories need to be answered with regard to that security organization.

### III. INTERROGATORIES

1. Do you admit that PGandE has employed or utilized the services of security organizations from time to time, since January 1, 1960? If not, please state your contention.
2. If the answer to Interrogatory 1 is yes, please list the name and address of each security organization employed by, or whose services were used by, PGandE since January 1, 1960.
3. For each security organization listed in response to Interrogatory 2, please provide the following information or documents:
  - a. The name and title of each officer of the

security organization;

- b. The date and period of each agreement or arrangement for service between PGandE and such security organization since January 1, 1960;
- c. A copy of all documents which describe, reflect, or relate in any manner to, the purposes for which the security organization was or is employed or utilized;
- d. A copy of all documents which describe, reflect, or relate in any manner to, the instructions given by PGandE to the security organization, whether such instructions were written or oral.
- e. The procedure by which the security organization reported or reports to PGandE the results of its activities, and the manner and location in which the information which results from its activities is stored, either by PGandE, by the organization or otherwise.
- f. A monthly statement of all payments made by PGandE to the security organization, or in the case of a security organization internal to PGandE, the cost of operating such organization.

g. The approximate amount of information obtained by PGandE from the security organization, whether physically stored within PGandE or the security organization, as expressed in numbers of pages.

h. A description of all methods used by the security organization to obtain information (other than by the compilation of information available from public, published sources), as well as a copy of all documents which describe, reflect or in any manner relate to, the methods used.

4. Do you admit that PGandE has employed or utilized the services of one or more security organizations in order to obtain information about persons whose economic or political interests may be in competition with, or opposed to, the interests of PGandE, but who have manifested no intent to take unlawful or violent action against PGandE? If not, please state your contention.

5. If the answer to Interrogatory 4 is yes, please list the name and address of each such person about whom PGandE sought to obtain information.

6. For each person listed in answer to Interrogatory 5, please identify the security organization employed or utilized and provide the following



information and documents:

- a. The purposes for which the information was sought and a copy of all documents which describe, reflect, or relate in any manner, to such purposes;
- b. A copy of all documents which describe, reflect, or in any way relate to, the instructions given by PGandE to the security organization for seeking to obtain such information;
- c. The dates when such services were employed or utilized;
- d. The amount of payment by PGandE to the security organization, or, in the case of a security organization within PGandE, the cost of seeking to obtain such information;
- e. All information obtained by PGandE or the security organization about the person or persons, whether obtained orally or in writing, including a copy of all documents which contain, describe, reflect or relate in any manner to such information;
- f. The name of each person within PGandE responsible for, or in any manner connected with, the efforts to obtain such information;
- g. A description of any action taken by PGandE which was in any manner affected by the infor-

mation which may have been obtained through such efforts.

7. Do you admit that PGandE has employed or utilized the services or one or more security organizations in order to obtain and/or store information about NCPA? If not, please state your contention.
8. If the answer to Interrogatory 7 is yes, please provide the following information and documents:
  - a. The name of each security organization so employed or utilized, and the name of each member of that organization who participated in any effort to obtain information about NCPA;
  - b. The date and period of each such effort to obtain information about NCPA;
  - c. The purposes for which the information was sought and a copy of all documents which describe, reflect, or relate in any manner, to such purposes;
  - d. A copy of all documents which describe, reflect, or in any way relate to the instructions given by PGandE to the security organization for seeking to obtain such information;
  - e. All information obtained by PGandE or the security organization about NCPA, whether obtained orally or in writing, as well as a copy of all documents which contain, describe,



reflect, or relate in any manner to, such information;

- f. The amount of payment by PGandE to the security organization, or, in the case of a security organization within PGandE, the cost of seeking to obtain such information;
- g. The name of each person within PGandE responsible for, or in any manner connected with, the efforts to obtain such information;
- h. A description of any action taken by PGandE which was in any manner affected by the information which may have been obtained through such efforts.

- 9. Do you admit that since 1971 PGandE has paid over \$80,000 to the security organization named Research West, or its predecessor, Western Research? If not, please state your contention.
- 10. Do you admit that, during the period when Research West or Western Research was being employed by PGandE, one of its agents, Mr. Jerry Ducote broke into the house of Grace McDonald, an elderly San Francisco woman who supports municipal ownership of utilities? If not, please state your contention.
- 11. Do you admit that PGandE contributed to the compensation of Mr. Ducote for his entry into the home of Grace McDonald? If not, please state your

contention.

12. Do you admit that PGandE, through Research West or Western Research, obtained access to information obtained from the house of Grace McDonald? If not, please state your contention.
13. If the answer to Interrogatory 12 is yes, please provide all such information to which PGandE has or had access, as well as all documents which contain describe, reflect, or relate in any manner to, such information.
14. Do you admit that PGandE obtains or stores information, either within PGandE or through an external security organization or organizations, on past or present officers, managerial employees, council members, directors, elected officials, or attorneys of other electric utilities?
15. Do you admit that PGandE obtains or stores information, either within PGandE or through an external security organization or organizations, on past or present officials, consultants, or employees of any State or federal executive, regulatory or administrative agency?
16. If the answer to either Interrogatory 14 or 15 (or both) is yes, please provide the following infor-

mation and documents as to each person or organization about which information is obtained or stored:

- a. The name of the persons or organizations;
- b. The source of all information about such person or organization;
- c. The information obtained or stored, as well as a copy of all documents which contain, describe, reflect or in any manner relate to, such information;
- d. The purposes for which such information is obtained or stored, as well as a copy of all documents which describe, reflect or in any manner relate to, such purposes;
- e. The uses which are, or have been, made of such information, as well as a copy of all documents which describe, reflect or in any manner relate to such uses;
- f. The expense to PGandE of obtaining or storing such information, expressed on a monthly basis;
- g. The procedure by which such information is obtained and/or stored; and
- h. The name, title and function of each person within PGandE who is responsible for, or in

any manner connected with, the obtaining or storing of such information.

17. Do you admit that the relationship between PGandE and Research West, Western Research or other security organizations has been the subject of investigation by Federal or State legislative, executive, administrative or regulatory bodies? If not, please state your contention.
18. If the answer to Interrogatory 17 is yes, please provide the following information and documents as to each such investigation:
- a. The name of the investigatory body;
  - b. The dates of the investigation;
  - c. The names and addresses of the security organizations which were within the scope of the investigation;
  - d. The names of the persons interviewed by PGandE and the investigatory body in the course of such investigation;
  - e. A copy of all documents provided by PGandE to the investigatory body;
  - f. A copy of all documents assembled by PGandE in the course of responding to actions or requests by the investigating body; and

In the Matter of )  
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Pacific Gas and Electric )  
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(Stanislaus Nuclear Project, )  
Unit No. 1) )

NRC Project No. P-564A

CERTIFICATE OF SERVICE

I hereby certify that copies of 1st SET OF INTERROGATORIES PROPOUNDED TO PG&E BY NCPA have been served on the following by deposit in the United States mail, first class, this 25th day of September 1978.

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- g. A copy of all documents which contain,  
describe, reflect, or in any manner relate to,  
the results of such investigation.

September 25, 1978

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A handwritten signature in dark ink, appearing to read 'R. C. McDiarmid', is written over a horizontal line.

Robert C. McDiarmid