

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
PACIFIC GAS AND ELECTRIC COMPANY ) Docket Nos. 50-275 O.L.  
(Diablo Canyon Nuclear Power Plant, ) 50-323 O.L.  
Units Nos. 1 and 2) )

INTERROGATORIES PROPOUNDED TO  
THE NUCLEAR REGULATORY COMMISSION  
BY SEVERAL INTERVENORS

REGARDING GEOLOGY, SEISMICITY QUALIFICATION

Under the authority of 10 C.F.R. §2.7406, 10 C.F.R. Part 2 Appendix A, and the Federal Rules of Civil Procedure, Intervenor SCENIC SHORELINE PRESERVATION CONFERENCE, SAN LUIS OBISPO MOTHERS FOR PEACE, SANDRA SILVER, ECOLOGY ACTION CLUB, and JOHN J. FORSTER ask that the Nuclear Regulatory Commission, their attorneys or other duly authorized agents or employees answer in writing, under oath, and within fifteen days from the receipt hereof, the interrogatories contained herein:

DEFINITIONS

1. As used herein, "you" and "N.R.C." shall mean the United States Nuclear Regulatory Commission and any employees of, contractors or consultants to, or other agents of said Commission.

B/14

2. As used herein, "magnitude" and "M" shall mean the measure of earthquake magnitude according to the Richter scale.

3. As used herein, "items" shall mean structures, systems, components, and parts of the Diablo Canyon Nuclear Generating Station.

4. As used herein, "DCNGS" shall mean the entire Diablo Canyon Nuclear Generating Station.

Interrogatory No. 1

What magnitude earthquake on the Hosgri fault near the DCNGS do you contend constitutes a proper, conservative value for use in evaluating the seismic safety of the DCNGS? Please state each and every fact upon which you base this contention.

Interrogatory No. 2

What ground acceleration from a 7.5M earthquake on the Hosgri fault do you contend constitutes a proper, conservative value for use in evaluating the seismic safety of the DCNGS? Please state each and every fact upon which you base this contention.

Interrogatory No. 3

What reductions in the response spectra for the various buildings of the DCNGS, due to the large foundations of these buildings, constitute proper, conservative values for evaluating the seismic safety of the DCNGS? Please state each and every fact upon which you base this contention.

Interrogatory No. 4

What value for structural damping for DCNGS do you

contend constitutes a proper, conservative value for use in evaluating the seismic safety of DCNGS? Please state each and every fact upon which you base this contention.

Interrogatory No. 5

Do you contend that the Hosgri fault is not linked to the San Gregario fault to form one fault system? If so, please state each and every fact upon which you base this contention.

Interrogatory No. 6

Do you contend that the Hosgri fault is not linked to the San Simeon fault to form one fault system? If so, please state each and every fact upon which you base this contention.

Interrogatory No. 7

Where do you contend is the location of the southeasternmost or downcoast end of the Hosgri fault? Please state each and every fact upon which you base this contention.

Interrogatory No. 8

What amount of strike-slip movement do you contend has occurred on the Hosgri fault since the Miocene geologic time period? Please state each and every fact upon which you base this contention.

Interrogatory No. 9

Do you contend that the strong (7.3M) earthquake recorded near the central California coast on November 4, 1927 took place on the Hosgri fault? If so, please identify the fault on which you contend this earthquake did take place



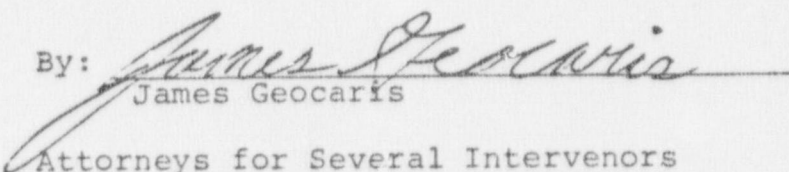
and state each and every fact upon which you base this contention.

Dated: March 22, 1977

Respectfully submitted,

BRENT N. RUSHFORTH  
JAMES GEOCARIS  
Center for Law in the Public Interest  
10203 Santa Monica Boulevard  
Los Angeles, California 90067  
(213) 879-5588

By:

  
James Geocarís

Attorneys for Several Intervenors