

February 6, 2008

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of:

Docket No. 72-26-ISFSI

SEC402

B. Lack of Information

If Intervenors currently lack information to answer any interrogatory completely, please state:

1. the reasons for the lack of information;
2. the responsive information currently available;
3. the responsive information identified but currently unavailable;
and
4. when such unavailable information will be available.

Each of the following requests requires supplementation in accordance with 10 C.F.R. §§ 2.740(e)(1) – (2). PG&E therefore requests that, in the event Intervenors obtain or discover any additional information that is responsive to any discovery request, Intervenors promptly supplement their responses to these requests.

C. Objections

In the event that Intervenors object to any interrogatory please indicate the basis for asserting the objection in sufficient detail so as to permit PG&E to consider, and the Licensing Board to adjudicate, the validity of such objection.

D. Privilege Log

As agreed by the parties, no parties shall be required to prepare a privilege log.
See Scheduling Order, at 4.

E. Intervenors

References to San Luis Obispo Mothers for Peace or Intervenors refer to SLOMFP, Santa Lucia Chapter of the Sierra Club, San Luis Obispo Cancer Action Now, Peg Pinard, Avila Valley Advisory Council, Central Coast Peace and Environmental Council, and

any branch, department, division, or such organizations, or anyone else acting on Intervenors' behalf or otherwise subject to their control.

II. INTERROGATORIES

Interrogatory 1

Identify each person whom Intervenors expect to provide sworn affidavits or declarations in connection with the written filing on Contention 2 for this Subpart K proceeding. For each person identified, describe that person's professional affiliation, address, area of professional expertise, qualifications, and educational and scientific experience. Also, describe the general subject matter on which each such identified person is expected to provide sworn affidavits or testimony in this proceeding.

Interrogatory 2

Identify each document that Intervenors expect to submit, reference, cite, or otherwise rely upon in the written filing in this Subpart K proceeding on SLOMFP Contention 2.

Interrogatory 3

Describe the analytical assumptions behind the conclusions from the Thompson Report referenced in SLOMFP Contention 2, at page 11. This description should identify analytical assumptions leading to the conclusions for both health effects and the extent of land contamination. This explanation should include a description of assumptions regarding: a) the mechanism for release; b) the number of casks ruptured and number of fuel rods breached; c) the radionuclide inventory and release fractions; d) the atmospheric dispersion; e) the meteorology; and f) the population distribution and land use characteristics.

Interrogatory 4

Describe the basis for the Intervenor's argument that the NRC Staff must consider non-fatal health effects and economic consequences given the NRC's response to comments in the Final EA Supplement (at A-6). See SLOMFP Reply, Contention 2, page 18-20. In discussing the basis for this position, describe how long-term health effects and economic consequences would result when projected doses to the nearest resident would be well below 5 rem.

Respectfully submitted,

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COUNSEL FOR PACIFIC GAS AND
ELECTRIC COMPANY

Dated in Washington, District of Columbia
this 6th day of February 2008

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of:)	
)	
Pacific Gas and Electric Co.)	Docket No. 72-26-ISFSI
)	
(Diablo Canyon Power Plant Independent)	
Spent Fuel Storage Installation))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "PACIFIC GAS AND ELECTRIC COMPANY'S INTERROGATORIES DIRECTED TO SAN LUIS OBISPO MOTHERS FOR PEACE REGARDING CONTENTION 2" has been served as shown below by electronic mail, this 6th day of February 2008. Additional service has also been made this same day by deposit in the United States mail, first class, as shown below.

Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff
(original + two copies)
e-mail: HEARINGDOCKET@nrc.gov

Judge E. Roy Hawkens
U.S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board
Washington, DC 20555-0001
e-mail: erh@nrc.gov

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Mail Stop T-3F23
Washington, DC 20555-0001

Office of Commission Appellate Adjudication
U.S. Nuclear Regulatory Commission
Mail Stop O-16C1
Washington, DC 20555-0001

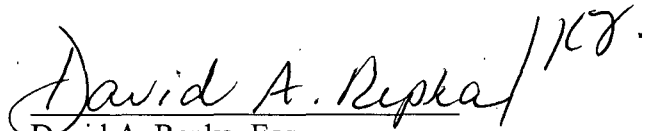
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and Electric Company