

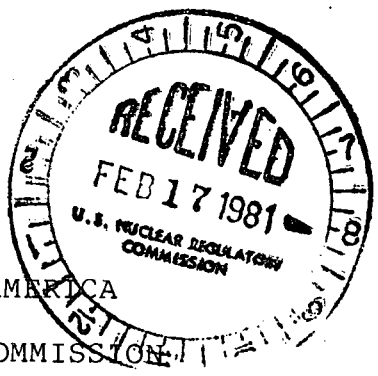
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18 UNITED STATES OF AMERICA
19 NUCLEAR REGULATORY COMMISSION

20 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

21 In the Matter of) 22) 23 SOUTHERN CALIFORNIA) 24 EDISON COMPANY, et al.,) 25) 26 (San Onofre Nuclear Generat-) 27 ing Station, Units 2 and 3)) 28)	Docket Nos. 50-361 OL 50-362 OL THIRD SET OF INTERROGATORIES TO INTERVENORS FRIENDS OF THE EARTH, MR. AND MRS. AUGUST CARSTENS, MR. AND MRS. LLOYD VON HADEN, MR. DONALD MAY, AND MRS. DONIS DAVEY
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[10 C.F.R. §§ 2.740b]

TO INTERVENORS FRIENDS OF THE EARTH, MR. AND MRS. AUGUST CARSTENS, MR. AND MRS. LLOYD VON HADEN, AND MRS. DONIS DAVEY AND THEIR ATTORNEY OF RECORD:

Applicants in the above-entitled action hereby request that you answer the following set of interrogatories under oath, by an officer or authorized agent, within fourteen (14) days of service hereof, pursuant to Title 10, Part 2, Section 2.740b of the Code of Federal Regulations.

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INSTRUCTIONS AND DEFINITIONS

For purposes of these Interrogatories and your responses thereto, the following definitions and instructions shall apply:

(a) The terms "FOE, et al.," "you," or "your" refers jointly to the intervenors responding to these Interrogatories: namely, Friends of the Earth, Mr. and Mr. August Carstens, Mr. and Mrs. Lloyd Von Haden, and Mrs. Donis Davey.

(b) The term "Applicants" refers jointly to the proponents of these Interrogatories, Southern California Edison Company and the San Diego Gas & Electric Company.

(c) The term "person" means any natural person and any private or public entity of any nature, including without limitation, corporations, firms, partnerships, sole proprietorships, associations, groups, organizations, trusts and estates.

(d) The term "document" means:

(1) The original, or

(2) If the original is not in your custody or under your control, then a copy thereof.

(e) As used herein, unless the context otherwise requires, the singular number includes the plural and the plural includes the singular; the masculine gender includes the feminine, and the feminine includes the masculine.

(f) When you are requested to "identify" any document, you shall include in your response a description sufficient to satisfy the "reasonable particularity" requirement found in Title 10, Part 2, Section 2.741(c) of the Code of Federal Regulations,

1 including without limitation the following information with
2 respect thereto:

- 3 (1) The nature of the document;
4 (2) Its date;
5 (3) The names of its addressor(s) and
6 addressee(s), if any;
7 (4) The name(s) of the person(s) who prepared it;
8 (5) The name(s) and address(es) of the present
9 custodian(s) of the original and any copies thereof; and
10 (6) A summary of its contents.

11 In lieu of providing the information specified in Paragraph (f),
12 Items (1)-(6), you may attach to your responses to these
13 Interrogatories a true copy of such document, identifying the
14 Interrogatory to which it is responsive and stating in your
15 answer only such of the information specified in Paragraph (f),
16 Items (1)-(6) as does not clearly appear on the face of such
17 document.

18 If you claim a document is privileged or attorneys'
19 work product, describe the same generally and state all facts
20 upon which you base the claim of privilege or the claim such
21 document constitutes attorneys' work product.

22 (g) When you are requested to "identify" any person,
23 you shall set forth the full name and last known business
24 address, residence address, and employer of such person you are
25 asked to identify.

26 (h) The term "expert" refers to a person who by virtue
27 of his knowledge, skill, experience, training or education has
28 acquired a scientific, technical or specialized knowledge which

1 can assist the Nuclear Regulatory Commission Licensing Board in
2 understanding the evidence or determining a fact, opinion, or
3 scientific theory relevant to an issue in this proceeding.

4 (i) When you are requested to "identify" an "expert"
5 as that latter term is defined in Paragraph (h) above, you shall
6 set forth the full name and last known business address,
7 residence address, academic affiliations, and present employer of
8 each such "expert" you are asked to identify.

9 (j) In answering these Interrogatories, you shall
10 furnish all information available to you, your respective agents,
11 employees, investigators, representatives and attorneys, and not
12 merely such information as is known from personal knowledge.

13 (k) The term "SONGS 2 and 3" refers to the San Onofre
14 Nuclear Generating Station, Units 2 and 3.

15 (l) The term "SCE" refers to the Southern California
16 Edison Company.

17 (m) The term "NRC" refers to the United States Nuclear
18 Regulatory Commission.

19 (n) The term "FSAR" refers to the "Final Safety
20 Analysis Report, San Onofre Nuclear Generating Station, Units 2
21 and 3," which Applicants believe is currently available to the
22 public in the Public Documents Room of the Mission Viejo Public
23 Library.

24 (o) Where the Interrogatories ask whether Intervenors
25 have "analyzed" a document or subject, Applicants define
26 "analyze" to be where Intervenors have reviewed the document or
27 subject in the context of SONGS 2 and 3 and have submitted a
28 written report of that review.

1 (p) Offshore Zone of Deformation ("OZD") as used in
2 this proceeding is a hypothesized zone of deformation which as
3 defined by the United States Geological Survey ("USGS") consists
4 of the Newport-Inglewood Zone of Deformation, the South Coast
5 Offshore Zone of Deformation and the Rose Canyon Fault Zone.

6 (q) Structural Relationship - A close association in
7 terms of origin, tectonic style*, or of a common source in space
8 and time.

9
10 INTERROGATORIES

11 INTERROGATORY NO. 1.

12 Do you contend that there exists geomorphic expressions
13 or other geologic evidence on the OZD that could have resulted
14 from ground motion related to an earthquake on the OZD of
15 magnitude:

16 (a) M 6.5?

17 (b) M 7.0?

18 (c) M 7.5?

19 (d) M 8.0?

20 INTERROGATORY NO. 2:

21 If any of your answers to Interrogatories 1(a), 1(b),
22 1(c) or 1(d) is yes, for each yes answer,

23 (a) State each and every fact upon which you base this
24 contention;

25 (b) Identify each and every document or communication

26 _____
27 */ tectonic style: The total character of a group of related
28 structures that distinguishes them from other groups of
structures, in the same way that the style of a building or
an art object distinguishes it from others of different
periods or influences. (AGI, 1980)

1 upon which you base this contention;

2 (c) Identify each and every person with knowledge of
3 the factual basis or bases for this contention, or on whose
4 writings, opinions, or testimony you base this contention; and

5 (d) Identify each and every person, expert or
6 otherwise, whom you expect to call as a witness at the hearing
7 before the Atomic Safety and Licensing Board in support of this
8 contention, and as to each potential witness so identified
9 provide the following information:

10 (i) State the substance of the facts and opinions
11 to which you expect the witness to testify;

12 (ii) Summarize the factual and theoretical basis,
13 as well as any other grounds, for each opinion to which the
14 witness is expected to testify; and

15 (e) Identify each and every event upon which you base
16 this contention.

17 DATED: February 10, 1981.

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19
20 DAVID R. PIGOTT
21 SAMUEL B. CASEY
22 JOHN A. MENDEZ
23 CHICKERING and GREGORY

24
25 CHARLES R. KOCHER
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27 SOUTHERN CALIFORNIA EDISON COMPANY

28
By David R. Pigott
David R. Pigott
One of Counsel for Applicants

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PROOF OF SERVICE BY MAIL

I declare that:

I am employed in the City and County of San Francisco, California.

I am over the age of eighteen years and not a party to the within entitled action; my business address is Three Embarcadero Center, Suite 2300, San Francisco, California 94111.

On February 10, 1981, I served the attached "THIRD SET OF INTERROGATORIES TO INTERVENORS FRIENDS OF THE EARTH, MR. AND MRS. AUGUST CARSTENS, MR. AND MRS. LLOYD VON HADEN, MR. DONALD MAY AND MRS. DONIS DAVEY" on the following in said cause, by placing a true copy thereof enclosed in sealed envelopes with postage thereon fully prepaid, in the United States mail at San Francisco addressed as follows:

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