

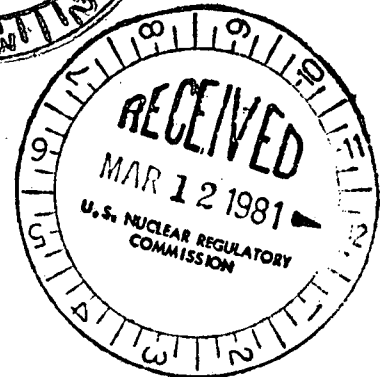
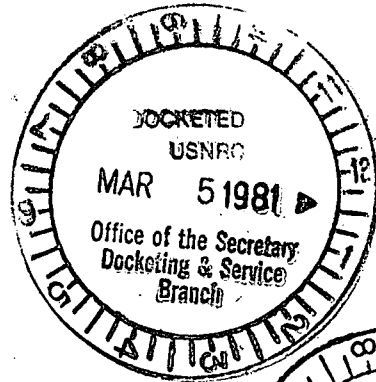
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

3/2/81

In the Matter of )  
)  
SOUTHERN CALIFORNIA )  
EDISON COMPANY, et al., )  
(San Onofre Nuclear Generat- )  
ing Station, Units 2 and 3). )

Docket Nos. ~~50-361~~ OL  
50-362 OL

FIFTH SET OF INTERROGATORIES  
AND FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS TO INTERVENORS  
FRIENDS OF THE EARTH, MR. AND  
MRS. AUGUST CARSTENS, MR. AND  
MRS. LLOYD VON HADEN, MR. DONALD  
MAY, AND MRS. DONIS DAVEY

TO: INTERVENORS FRIENDS OF THE EARTH, MR. AND MRS. AUGUST  
CARSTENS, MR. AND MRS. LLOYD VON HADEN, MR. DONALD MAY, 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. Applicants further request that  
you make available for inspection and copying the documents

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specified below pursuant to Title 10, Part 2, Section 2.741 of the Code of Federal Regulations.

INSTRUCTIONS AND DEFINITIONS

For purposes of these Interrogatories and your responses thereto, as well as the Request for Production of Documents, 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 Mrs. August Carstens, Mr. and Mrs. Lloyd Von Haden, Mr. Donald May 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 "Intervenors" refers jointly to FOE, et al. and intervenor Groups United Against Radiation Danger (hereinafter referred to as "GUARD"), as well as their respective members and agents.

(d) 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.

(e) The terms "document" or "documents" mean: the original, or if the original is not in your custody or under your control, then a copy of any written, printed, recorded, or graphic matter, photographic matter, or sound reproductions, however produced or reproduced.

(f) The term "communication" refers to any contact, oral or documentary, formal or informal, at any time or place or under any circumstances whatsoever, whereby information of any nature was transmitted or transferred.

(g) 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.

(h) 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, including without limitation the following information with respect thereto:

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

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

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

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

(j) When you are requested to "identify" an "event" or a "communication" 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, including without limitation the following information with respect thereto:

(1) The general nature and description of the event or communication;

(2) The time of the event or communication;

(3) The place of the event or communication;

(4) Persons involved in the event or communication; and

(5) Available documentation of the event or communication.

(k) The term "expert" refers to a person who by virtue of his knowledge, skill, experience, training or education has acquired a scientific, technical or specialized knowledge which can assist the Nuclear Regulatory Commission Atomic Safety and Licensing Board in understanding the evidence or determining a

fact, opinion, or scientific theory relevant to an issue in this proceeding.

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

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

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

(o) The term "NRC" refers to the United States Nuclear Regulatory Commission; the term "ASLB" refers to the NRC's Atomic Safety and Licensing Board before whom contentions in this proceeding, not otherwise withdrawn, are to be adjudicated.

(p) Where the Interrogatories ask whether Intervenors have "analyzed" or intend to "analyze" a document or subject, Applicants define "analyze" to be where Intervenors or their consultants have reviewed the document or subject in the context of SONGS 2 and 3 and have produced or intend to produce a written report of that review.

(q) The term "San Clemente Plan" refers to the "City of San Clemente, Radiological Emergency Response Plan Annex to the City's Emergency Operations Plan", adopted on February 18, 1981, and served on all parties hereto on February 23, 1981.

(r) The terms "offsite assistance agency" or "offsite assistance agencies" refers generally to any or all federal, State, and local governmental agencies with jurisdiction to respond in any manner in the event of a radiological emergency at SONGS 2 and 3.

(s) The term "Federal Requirements" refers to the current NRC emergency planning regulations set forth in 10 C.F.R. §§ 50.33, 50.47, 50.54(q)(r)(s)(t) and (u); and 10 C.F.R. Part 50, Appendix E.

I.

INTERROGATORIES

INTERROGATORY NO. 1:

Do you contend that the San Clemente Plan does not adequately comply with the Federal Requirements? If so,

(a) State each and every section and subsection of the Federal Requirements with which you contend the plan does not comply;

(b) State each and every fact upon which you base your contention;

(c) Identify each and every document upon which you base your contention;

(d) Identify each and every event or communication upon which you base your contention;

(e) Identify each and every person with knowledge of the factual basis or bases of this contention, or on whose writing, opinions, or prior testimony you base this contention;

(f) Identify each and every person whom you expect to call as a witness, expert or otherwise, at the hearing before the

ASLB with respect to the San Clemente Plan and, as to each witness so identified, please provide the following information:

(1) State the precise subject matter on which the witness is expected to testify;

(2) State the substance of the facts and opinions to which the witness is expected to testify;

(3) Summarize the factual and theoretical bases as well as any other grounds, for each opinion to which the witness is expected to testify.

INTERROGATORY NO. 2:

Have you analyzed or do you intend to analyze the San Clemente Plan? If so,

(a) Identify when such analysis was performed or is expected to be performed;

(b) Identify each and every person who has performed or who is to perform such an analysis;

(c) State whether each such analysis will be voluntarily provided to Applicants without further motion to produce such analysis; and

(d) Identify each and every document or communication wherein such analysis may be found or is referenced.

INTERROGATORY NO. 3:

Have you discussed the San Clemente Plan with representatives or employees of the City of San Clemente, or the representatives or employees of any other offsite assistance agency? If so,

(1) Identify the person or persons with whom you discussed the San Clemente Plan and the approximate date of each such discussion; and

(2) Identify each and every document or communication pertaining to your discussion of the San Clemente Plan with each person identified in subparagraph (1) immediately above.

II.

REQUEST FOR PRODUCTION OF DOCUMENTS.

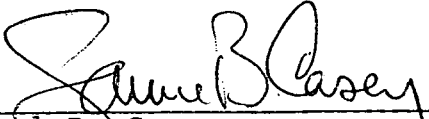
Pursuant to 10 C.F.R. § 2.741, the Applicants request FOE, et al. to make available for inspection and copying at a mutually agreeable time and place all documents which you have identified in response to these interrogatories.

DATED: March 2, 1981.

DAVID R. PIGOTT  
SAMUEL B. CASEY  
JOHN A. MENDEZ  
CHICKERING & GREGORY

CHARLES R. KOCHER  
JAMES A. BEOLETTO  
SOUTHERN CALIFORNIA EDISON COMPANY

By

  
\_\_\_\_\_  
Samuel B. Casey  
One of counsel for Applicants



CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of March, 1981, a copy of the FIFTH SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO INTERVENORS FRIENDS OF THE EARTH, MR. AND MRS. AUGUST CARSTENS, MR. AND MRS. LLOYD VON HADEN, MR. DONALD MAY, AND MRS. DONIS DAVEY was served upon each of the following by depositing in the United States mail, first-class, postage prepaid, addressed as follows:

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U.S. Nuclear Regulatory Commission  
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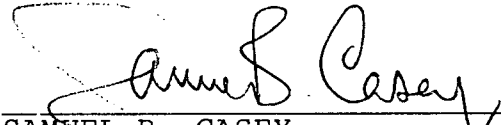
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Washington, D.C. 20555

Docketing and Service Section  
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