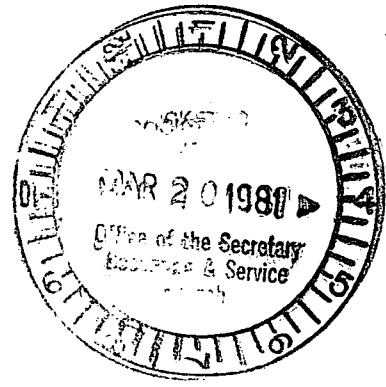


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11

12 UNITED STATES OF AMERICA

13 NUCLEAR REGULATORY COMMISSION

14 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

15 In the Matter of)
16 SOUTHERN CALIFORNIA EDISON COMPANY,)
et al.,)
17 (San Onofre Nuclear Generating)
18 Station, Units 2 and 3).)
19

Docket Nos. 50-361 OL
50-362 OL

MOTION TO COMPEL ANSWERS TO
APPLICANTS' SECOND SET OF
INTERROGATORIES TO GUARD

20 TO: THE ATOMIC SAFETY AND LICENSING BOARD, THE PARTIES, AND
21 THEIR COUNSEL OF RECORD HEREIN:

22 SOUTHERN CALIFORNIA EDISON COMPANY and SAN DIEGO
23 GAS & ELECTRIC COMPANY ("Applicants") hereby move the Atomic
24 Safety and Licensing Board for an Order pursuant to 10
25 C.F.R. § 2.740(f) compelling Intervenor, Groups United
26 Against Radiation Danger (GUARD), to answer Applicants'
27 "Second Set of Interrogatories to Intervenor, Groups United
28 //

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1 Against Radiation Danger (GUARD)", served by Applicants on
2 February 17, 1981.

3 The grounds for this motion, which are more fully
4 set forth in the accompanying "Memorandum of Points and
5 Authorities in Support of Motion to Compel Answers to Applicants'
6 Second Set of Interrogatories to GUARD" are that Intervenors
7 have failed to serve a copy of their answers and objections
8 upon all parties to the proceeding within fourteen (14) days
9 after service of the interrogatories as required by 10
10 C.F.R. §2.740b(b).

11 This motion is based on this "Motion to Compel
12 Answers to Applicants' Second Set of Interrogatories to
13 GUARD", the accompanying "Memorandum of Points and Authorities
14 in Support of Motion to Compel Answers to Applicants' Second
15 Set of Interrogatories to GUARD" and the proposed "Order
16 Compelling Answers to Applicants' Second Set of Interrogatories
17 to GUARD", the record in the above-captioned proceeding, and
18 any and all such further oral arguments or documentary
19 evidence which may come before this Board.

20 Dated: March 16, 1981.

21 DAVID R. PIGOTT
22 SAMUEL B. CASEY
23 JOHN A. MENDEZ
24 CHICKERING & GREGORY

25 CHARLES KOCHER
26 JAMES BEOLETTO
27 SOUTHERN CALIFORNIA EDISON COMPANY

28 By David R. Pigott
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