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and SAN DIEGO GAS & ELECTRIC COMPANY

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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|------------------------------------|---|------------------------------------|
| In the Matter of |) | Docket Nos. 50-361 OL |
| |) | 50-362 OL |
| SOUTHERN CALIFORNIA EDISON |) | |
| COMPANY, <u>et al.</u> (San Onofre |) | APPLICANTS' STATEMENT OF |
| Nuclear Generating Station, |) | MATERIAL FACTS REGARDING |
| Units 2 and 3). |) | INTERVENOR FRIENDS OF THE |
| ----- |) | EARTH, <u>ET AL.</u> 's CONTENTION |
| |) | 1a (DEWATERING WELLS) AS TO |
| |) | WHICH NO GENUINE ISSUE |
| |) | <u>EXISTS TO BE HEARD.</u> |

Pursuant to 10 C.F.R. § 2.749(a), SOUTHERN CALI-
FORNIA EDISON COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY
(hereafter the "Applicants") hereby submit their proposed
statement of material facts as to which Applicants claim

there exists no genuine issue to be heard regarding the dewatering well contention (Contention 1a) as alleged by Intervenor FRIENDS OF THE EARTH, ET AL. and admitted to this proceeding by Memorandum and Order of the Atomic Safety and Licensing Board, dated January 27, 1978.

STATEMENT OF MATERIAL FACTS

1. The geology of the San Mateo Formation underlying the San Onofre Nuclear Generation Station, Units 2 and 3, site (hereafter the "Site") is such that subsurface cavities are not naturally occurring phenomena.

2. All excavations and borings performed on the Site, including those associated with the construction of the construction-dewatering wells, confirm that there are no naturally occurring cavities in the San Mateo Foundation underlying the Site.

3. The operation of the construction dewatering system on the Site caused subsurface cavities to be formed adjacent to five dewatering wells.

4. An extensive field and laboratory investigation of the 10 operational construction dewatering wells on the Site detected all significant cavities underlying the Site and defined the depth, lateral extent, and characteristics of the cavities and the in-fill material associated with these cavities.

5. The significant characteristics of the detected cavities are that they were sand filled, limited in areal extent, rather lobate in shape, and predominantly located in the draw-down zone developed by the construction dewatering process on the Site.

6. All detected cavity areas have been properly filled with sand or grout and contain no open voids.

7. The NRC Staff has approved or been informed of each step of the Applicants' program to investigate and demobilize all cavities caused by the Site construction dewatering system, and is satisfied that the cavities caused by Applicants' construction dewatering of the Site can have no unacceptable adverse effect on the capability of structures and equipment of San Onofre Nuclear Generating Station, Units 2 and 3, to withstand the Design Basis Earthquake.

8. Analysis of the maximum effects of the detected cavities on the performance of Seismic Category I structures, considering static, as well as Design Basis Earthquake loading conditions, indicates that any cavities caused by the Applicants' construction-dewatering of the Site can have no unacceptable adverse effect on the capability of structures and equipment of San Onofre Nuclear

Generating Station, Units 2 and 3, to withstand the Design
Basis Earthquake.

DATED: June 6, 1980

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