

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
PACIFIC GAS AND ELECTRIC COMPANY)
Units 1 and 2)
Diablo Canyon Site)

Docket Nos. 50-275-OL
50-323-OL

RESPONSE OF PACIFIC GAS AND ELECTRIC COMPANY
TO JOINT MOTION TO COMPEL DISCOVERY

On November 24, 1975 the San Luis Obispo Mothers For Peace and John J. Forster filed a joint motion to compel discovery. For the reasons set forth below PGandE submits that the motion should be denied.

1. The discovery requested is not required for the Part 70 hearing next week. Although one of the issues framed by the Board involves sabotage, it assumes that one or more saboteurs gain access to the plant. Thus, the site security plan will not be in issue at the Part 70 hearing.

2. PGandE has indicated that at the proper time and under the proper circumstances it is prepared to reveal the details of the site security arrangements to the extent they are involved in the contentions of the intervenors. Thus, the motion to compel is not necessary. However, in this connection PGandE again requests that Mr. L. D. DeNike's technical qualifications to review this information be furnished.

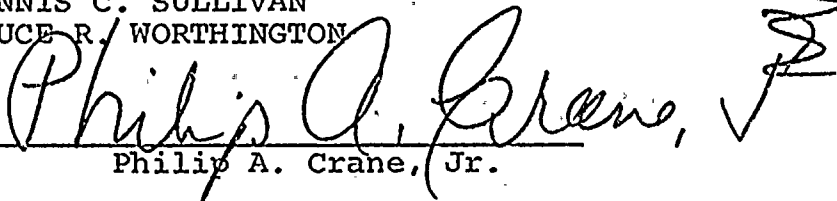


3. The motion is not timely. Under NRC regulations (10 CFR 2.740(f)) the motion should have been filed five days after PGandE's response to interrogatories which was dated November 7, 1975.

Respectfully submitted,

JOHN C. MORRISSEY
PHILIP A. CRANE, JR.
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By


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Dated: December 2, 1975

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CERTIFICATE OF SERVICE

The foregoing document(s) of Pacific Gas and Electric Company has ~~(has)~~ been served today on the following by deposit in the United States mail, properly stamped and addressed:

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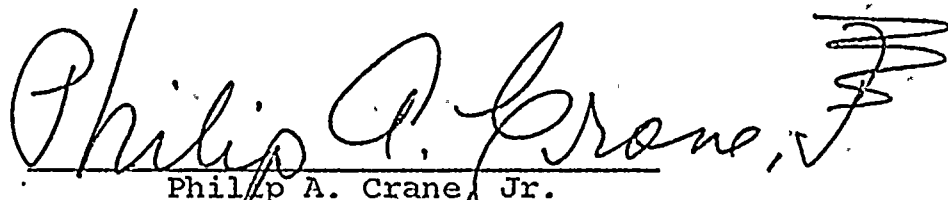
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Dated: December 2, 1975

