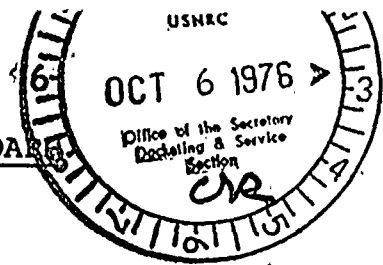


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

9-23-76

In the Matter of)
PACIFIC GAS AND ELECTRIC COMPANY)
(Diablo Canyon Nuclear Power Plant,)
Units Nos. 1 and 2))

Docket Nos. 50-275 O.L.
50-323 O.L.

AFFIDAVIT OF JAMES A. GEOCARIS

James A. Geocaris deposes and says under oath:

1. I am an attorney with the Center for Law in the Public Interest, counsel for several intervenors in the above-entitled action. The purpose of this affidavit is to present specific facts, as required by Federal Rules of Civil Procedure Rule 56 (f), justifying intervenors' inability at this time to present all facts justifying intervenors' opposition to the NRC Staff Motion for Summary Disposition.

2. For the last six weeks, I have spent the major portion of my working time on the Diablo Canyon case. One of my primary duties in my work on the case has been to contact technical experts in fields relevant to the Diablo Canyon proceedings, ask them to serve as technical consultants for intervenors, and provide them with data regarding the Diablo plant for their technical review.

3. During August and early September, I had considerable difficulty in even contacting technical consultants to work on

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behalf of intervenors. Most of the technical consultants who would be willing to help intervenors in proceedings before the Nuclear Regulatory Commission hold positions at various California Universities. Because of the schedule for the academic year, most of these scientific experts were away from their posts during August and early September.

4. In the past two weeks, I have had more success contacting technical consultants in appropriate fields. But because of the large volume of technical material relevant to these proceedings, these technical consultants whom I have contacted recently have not had sufficient time to conduct an adequate technical review of all relevant materials.

5. Dr. Leslie Grimm began work for us only two weeks ago. Her expertise relates to Contentions 1C., 1D., 1F., 1G. and 1J. While Dr. Grimm has had time to review some of the voluminous data relevant to these contentions, she has not had sufficient opportunity in only two weeks to conduct a full literature search or consult other scientists in relevant fields. (See accompanying affidavit of Dr. Leslie Grimm.)

6. I obtained the names of three additional scientific experts only this week who, taken together, have expertise in fields covering Contentions 1C.-J. I contacted these experts in the last week, but no one from our office will be able even to meet with these experts until the end of this week. After the initial meeting, these technical consultants probably will



need considerable time to adequately evaluate relevant Staff and applicant submissions and technical literature. These technical consultants could provide considerable additional information in support of intervenors' contentions, including the first technical review in intervenors' behalf regarding the physical modeling of the thermal plume encompassed by Contentions I E., I H. and I I.

8. Dr. Roland Finston, Chairman of the Department of Health Physics at Stanford University, serves as a technical consultant for intervenors on radiological issues, including the issues covered by environmental Contention 4. Dr. Finston could begin his technical review of relevant radiological evidence for intervenors only two weeks ago. During this review, Dr. Finston did not have available to him important data on which the Staff based several significant factual claims regarding adverse radiological impacts (see accompanying affidavit of Dr. Roland Finston). In addition, another expert consultant for intervenors in this field of radiological impacts, Dr. John Gofman, will not be available for consultation until about October 1.

9. As a result of all of the facts set forth above, intervenors require at least until early November to enable their technical consultants to complete all technical review, literature searches, discovery and all other activities necessary to present all facts that justify intervenors' opposition to the Staff's motion for summary disposition of these environmental contentions.



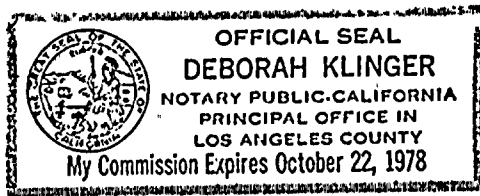
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James A. Geocaris
James A. Geocaris

Subscribed and sworn to before
me this 23rd day of September 1976.

Deborah Klinger
Notary Public

My Commission Expires 10-22-78.





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