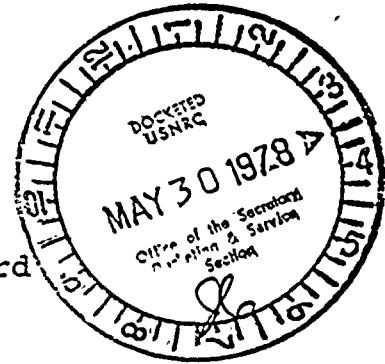


RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board



5/23/78

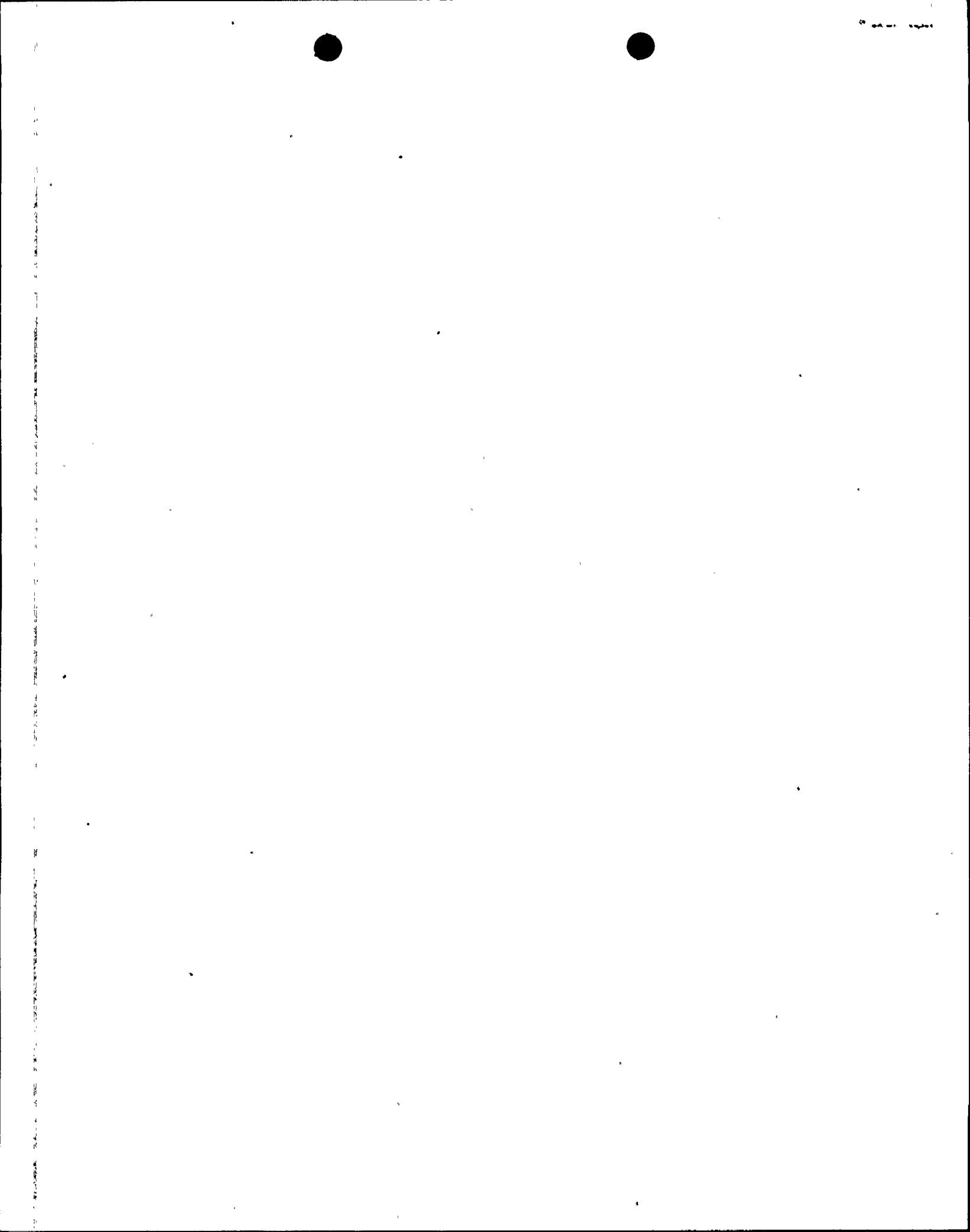
In the Matter of:)
)
PACIFIC GAS and ELECTRIC COMPANY)
)
(Diablo Canyon Nuclear Power Plant,)
Units 1 and 2)
)

Docket Nos. 50-275 OL
50-323 OL

PETITION TO ESTABLISH QUALIFICATIONS OF
DAVID COMEY AS SECURITY EXPERT FOR DISCOVERY

San Luis Obispo Mothers for Peace ("SLOMFP") requests this Licensing Board to determine that David Comey is a qualified expert to review for discovery purposes, and in compliance with the Board's "Order Relative to Motions Concerning Intervenors' Security Contention" dated November 3, 1977 and received December 6, 1977, information described in the Board's "Order Relative to Discovery of Applicant's Security Plan" dated June 17, 1977. A statement of Mr. Comey's qualifications is attached as Exhibit "A".

Mr. Comey is an expert with respect to security plans and security installations of nuclear power plants. In 1974, he reviewed the security plans, under the terms of a protective order, and inspected the facilities at the plant and participated



in a negotiation of an in camera settlement agreement with respect to the security system of Donald C. Cook, 1 and 2, nuclear plants.

In 1973, Mr. Comey reviewed the security plan, under protective order, and inspected the security facilities and conducted the cross-examination on the security plan for Zion, 1 and 2, Docket Numbers 50-295 and 50-304.

Dated this 23rd day of May, 1978, at Palo Alto, California.

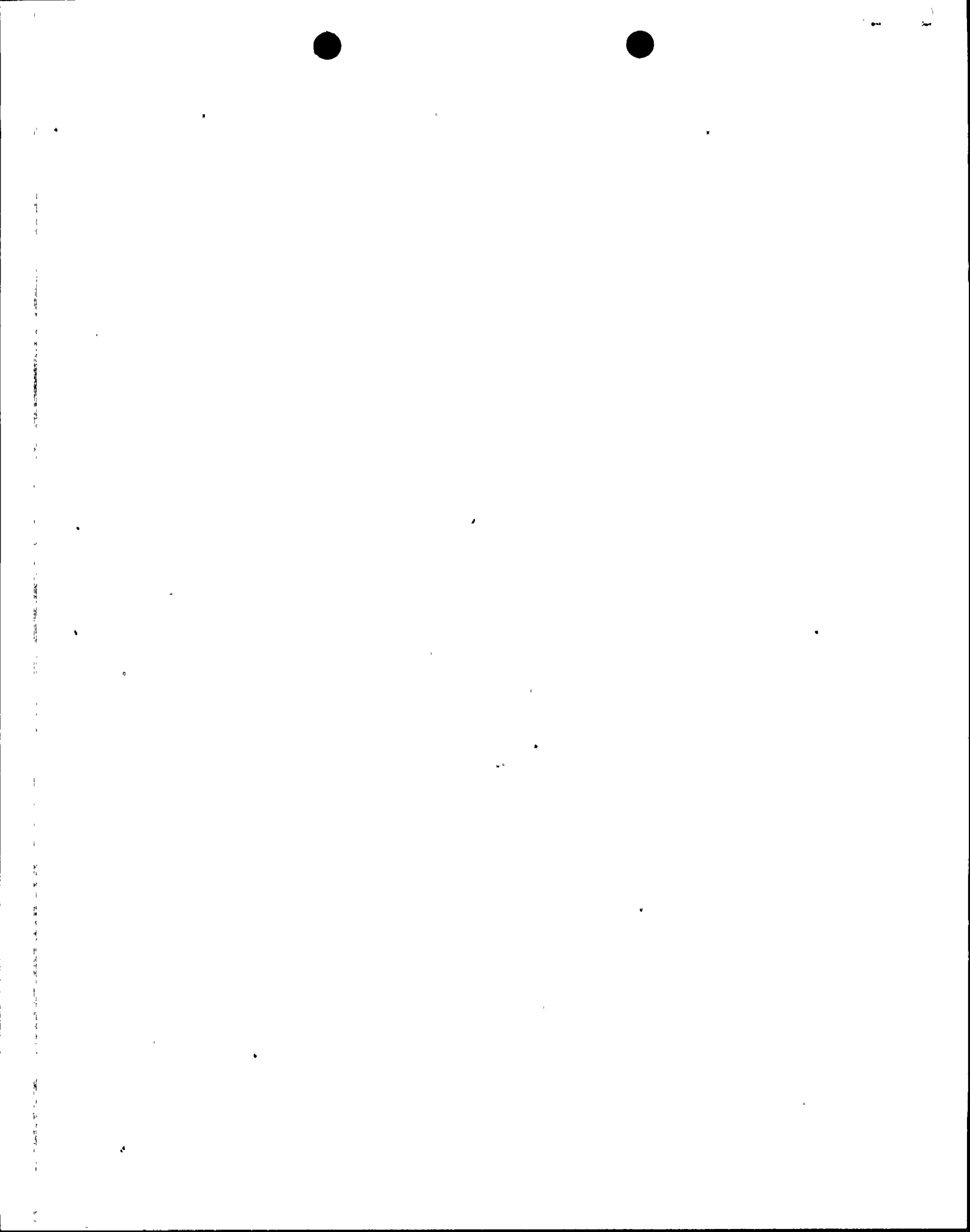
Respectfully submitted,

PAUL C. VALENTINE
YALE I. JONES

Attorneys for Intervenor
San Luis Obispo Mothers for Peace

By 

PAUL C. VALENTINE



Statement of Personal Qualifications
of
DAVID DINSMORE COMEY

In The Matter of:
Diablo Canyon Nuclear Power Plant
Units 1 and 2
Docket Numbers 50-275 OL; 50-323 OL

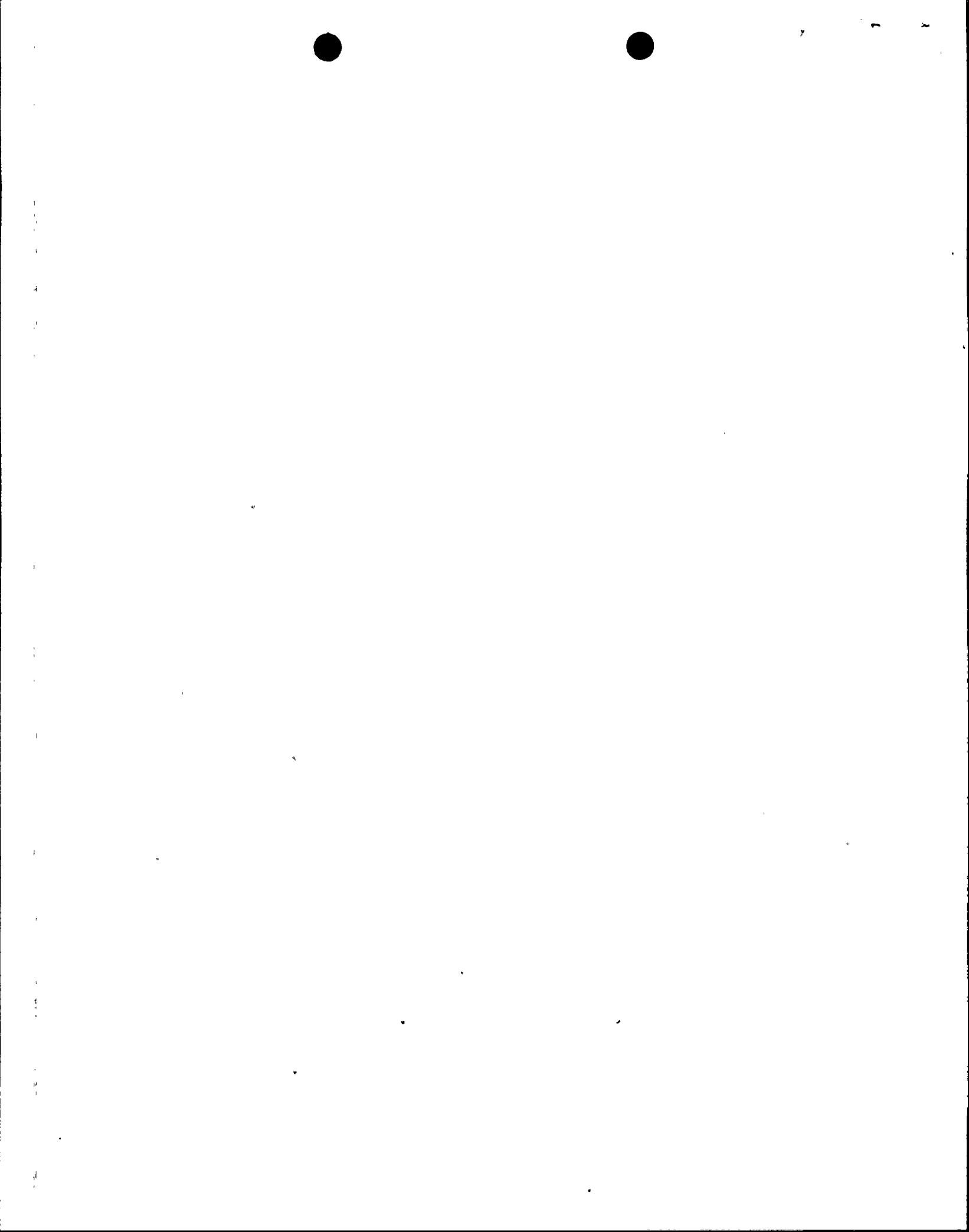
May 24, 1978

David Dinsmore Comey is President of Citizens for a Better Environment, a not-for-profit corporation specializing in environmental research. Citizens for a Better Environment has four offices in the Midwest, with a full-time research staff of 14 scientists, economists, engineers and research associates, plus two lawyers. Its main office is at 59 East Van Buren Street, Suite 2610, Chicago, Illinois 60605.

Mr. Comey is a graduate of Princeton University and worked for many years as an analyst of Soviet scientific research. He had two one year Ford Foundation Fellowships, and spent two years as an Assistant Professor at the Osteuropa Institut of the Universitat Freiburg/Schweiz. In 1963 he became a Research Associate at the Center for International Studies at Cornell University, and for six years he was the Director of the Research Institute on Soviet Science.

In 1969 he resigned to become Director of the Research Division of Schickel Environmental Development Company, an environmental consulting firm with headquarters in Ithaca, New York.

In 1970 he resigned to become Director of Environmental Research at Businessmen for the Public Interest (BPI), a public interest law firm located in Chicago, Illinois. At BPI one of his responsibilities was research on nuclear power plant design problems, much of which culminated in litigation before the Atomic Safety and Licensing Boards of the U.S. Atomic Energy Commission (AEC).



In this connection, he reviewed the Safety Analysis Reports and Safety Evaluations of approximately two dozen power reactors located in the U.S., and in addition, he has read several thousand safety-related reports generated by the U.S. AEC and its successor agencies. He has also studied in detail more than four thousand Abnormal Occurrence Reports describing failures of safety equipment at nuclear power plants in the United States.

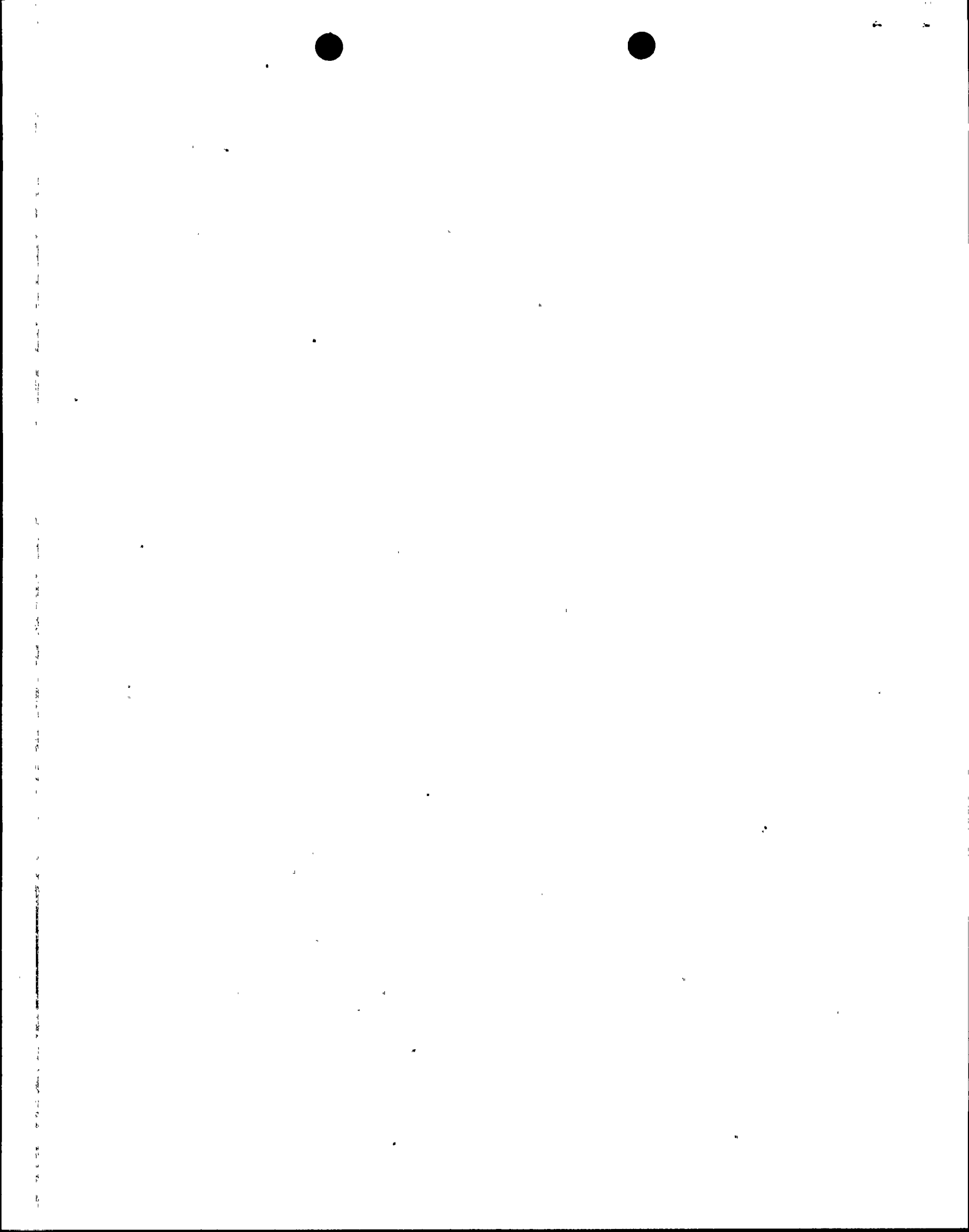
He has conducted detailed, and sometimes repetitive on-site inspections of the nuclear steam supply systems, control systems and auxiliary power systems at four boiling water reactor units and six pressurized water reactor units, including five Westinghouse reactors. In the case of four of those Westinghouse reactors, he has reviewed the plant security plans as well.

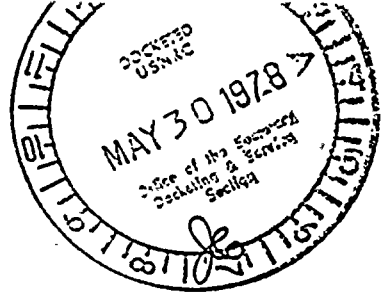
He is familiar, on a first-hand basis, with the physical layout and operation of the above-mentioned systems at these plants, including control rooms and plant security control centers.

He has testified on nuclear plant security matters in in camera sessions before the Advisory Committee on Reactor Safeguards, and has had numerous consultations on the subject of reactor sabotage with members of the staff of the U.S. Atomic Energy Commission and the U.S. Nuclear Regulatory Commission (NRC), both at the regional office level and also at headquarters in Bethesda, Maryland.

For the past year he has served as a member of the Nuclear Safeguards and Proliferation Panel of the Office of Technology Assessment of the U.S. Congress. This panel, which consisted of Mr. Comey, Chester Cooper, William Higinbotham, George Kistiakowsky, Herbert Scoville, Henry DeWolf Smyth, George Stathakis, Theodore Taylor, Cyrus Vance, Alvin Weinberg, Mason Willrich and others, has reviewed U.S. nuclear policy with respect to preventing nuclear proliferation, particularly to "non-state adversaries".

In addition, he has served, together with Willy Higinbotham and a staff of outside consultants from Brookhaven National Laboratory, the Defense Nuclear Agency, and the Rand Corporation, on a special review group on physical security and safeguards against terrorist attack on nuclear facilities.





UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of:)	
)	
PACIFIC GAS and ELECTRIC COMPANY)	Docket Nos. 50-275 OL
)	50-323 OL
(Diablo Canyon Nuclear Power Plant,)	
Units 1 and 2))	

AFFIDAVIT OF PAUL C. VALENTINE IN SUPPORT OF A
PETITION FOR CONSIDERATION OF ADDITIONAL SECURITY EXPERT

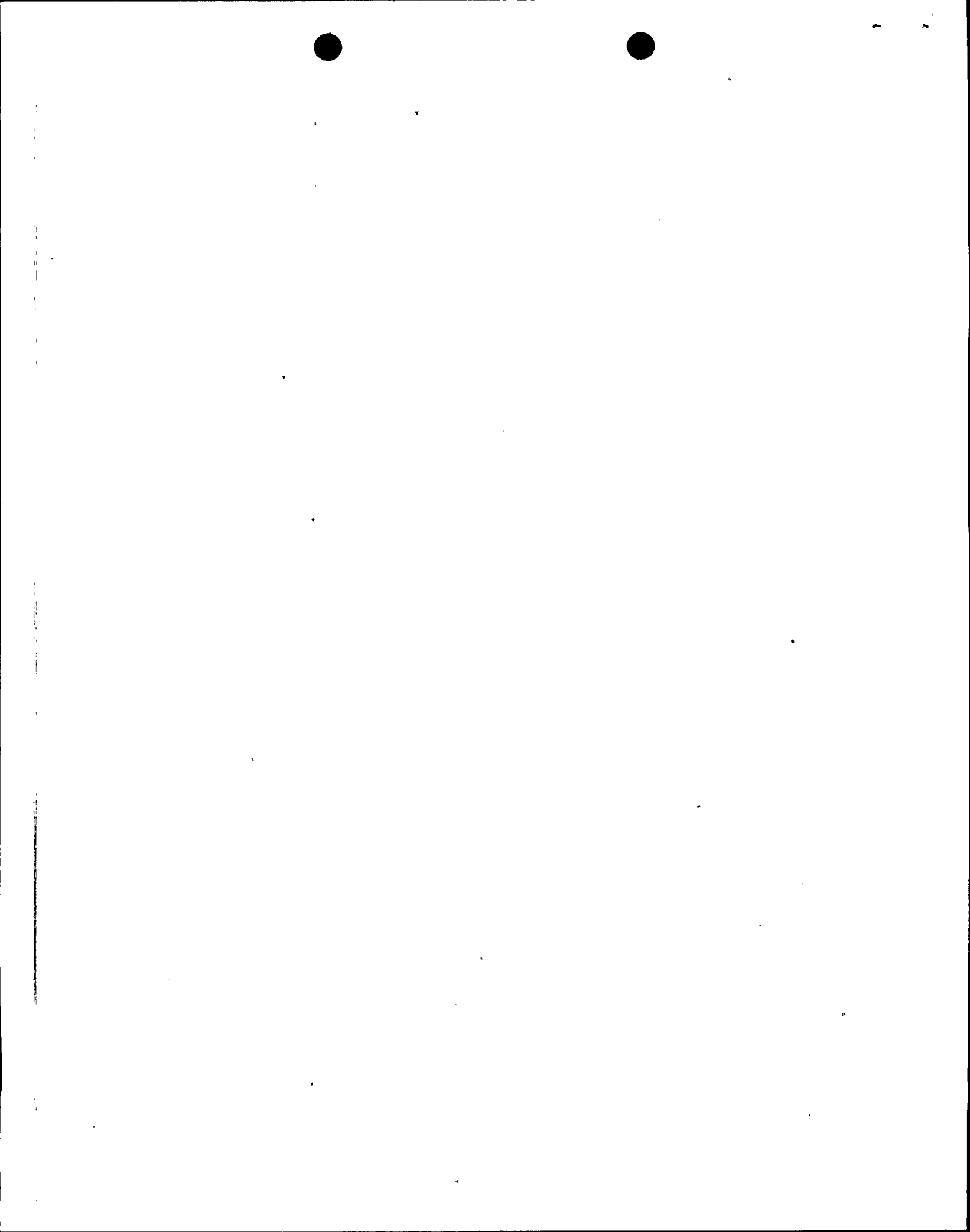
State of California)
County of Santa Clara) ss:

On November 3, 1977, this Board entered its Order
Relative to Motions Concerning Intervenors' Security Contention.

We received a copy of this Order on December 6, 1977,
and pursuant to the terms of the Order, our sixty (60) days time
to submit experts for consideration expired February 5, 1978.

Prior to February 5, 1978, I had requested Mr. Comey
to be an expert witness in this case. He declined at that time
because of conflicts in his schedule which he could not reconcile.

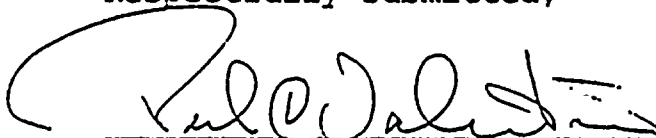
I learned today, May 23, 1978, that he now would be
able to serve as an expert, and I have filed this petition as
promptly as possible.



Neither the staff nor the applicant is prejudiced by the lateness of this petition. I respectfully request that this Board establish that Mr. Comey is qualified to serve as a security expert in this case.

DATED: May 23, 1978

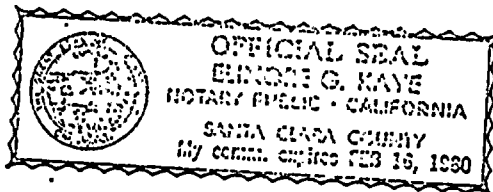
Respectfully submitted,



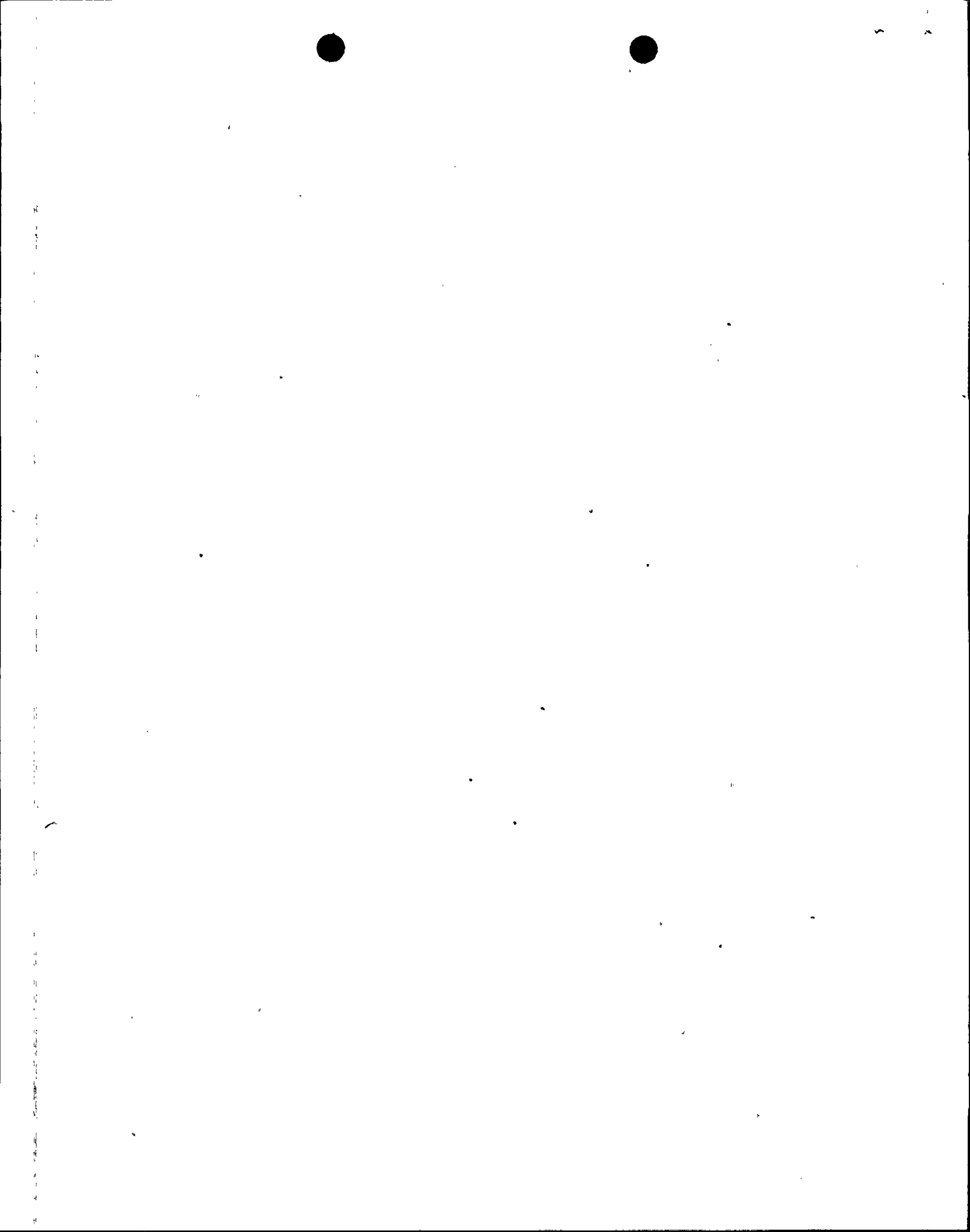
PAUL C. VALENTINE

Attorney for Intervenor
San Luis Opispo Mothers for Peace

Subscribed and sworn to before me, a Notary Public of the State of California, this 23rd day of May, 1978, at Palo Alto, California.

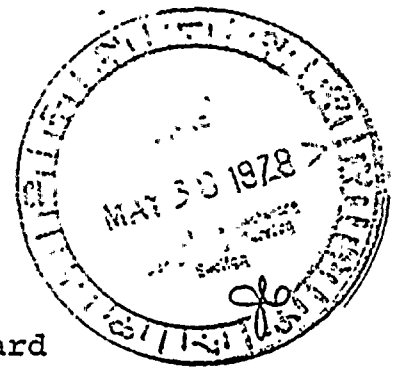


Notary Public



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board



In the Matter of:)
)
PACIFIC GAS and ELECTRIC COMPANY) Docket Nos. 50-275 OL
) 50-323 OL
(Diablo Canyon Nuclear Power Plant,)
Units 1 and 2)

CERTIFICATE OF SERVICE

I hereby certify that copies of

PETITION TO ESTABLISH QUALIFICATIONS OF DAVID COMEY AS
SECURITY EXPERT FOR DISCOVERY and AFFIDAVIT OF PAUL C.
VALENTINE IN SUPPORT OF A PETITION FOR CONSIDERATION OF
ADDITIONAL SECURITY EXPERT

both dated May 23, 1978, have been served on the following by
deposit in the United States mail, first class, postage prepaid,
this 23rd day of May, 1978.

Elizabeth S. Bowers
Chairman, Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. William E. Martin
Senior Ecologist
Battelle Memorial Institute
Columbus, Ohio 43201

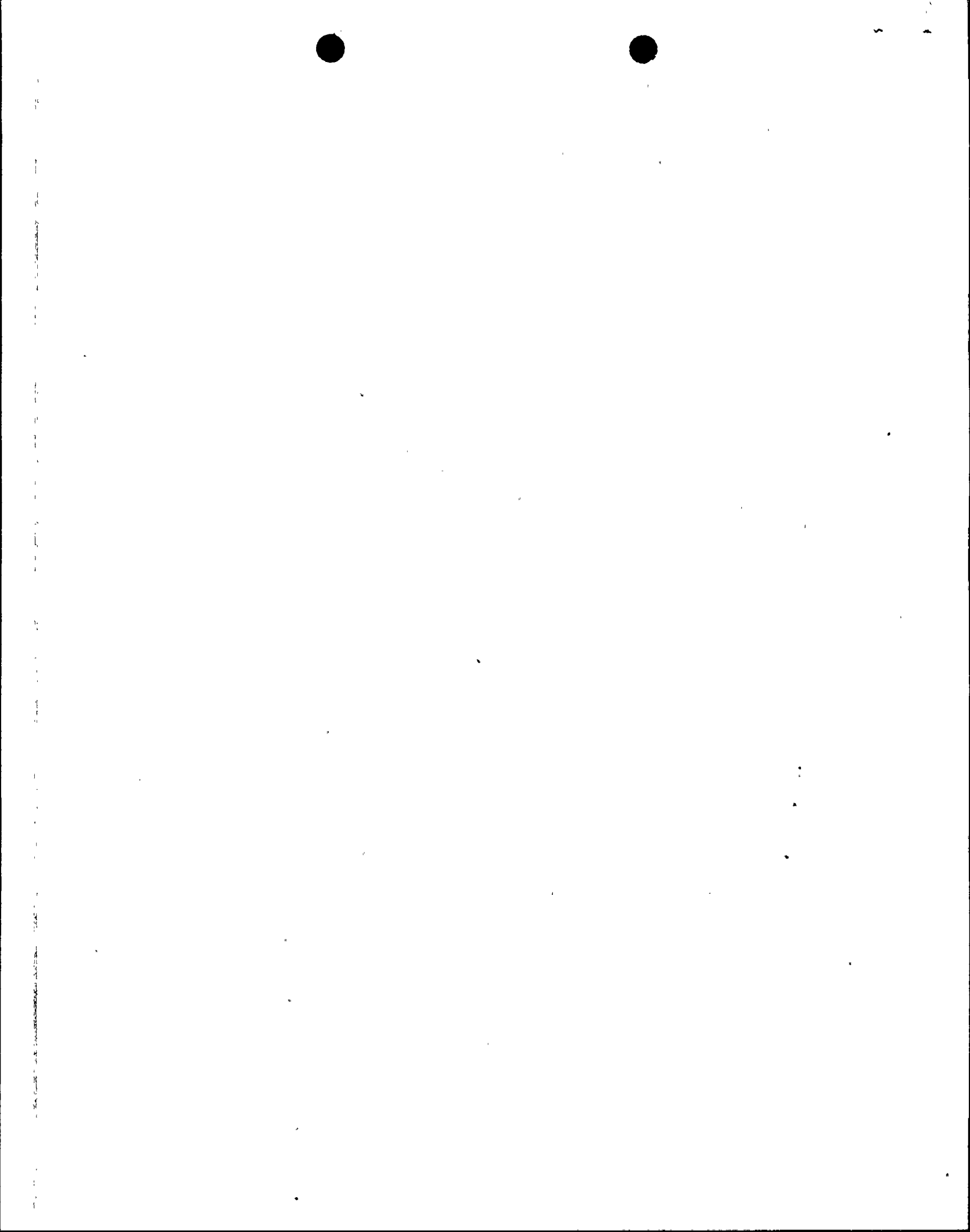
Mrs. Elizabeth Apfelberg
1415 Cozadero
San Luis Obispo, CA 93401

Mrs. Raye Fleming
1920 Mattie Road
Shell Beach, CA 93449

Mrs. Sandra A. Silver
5055 Radford Avenue
North Hollywood, CA 91607

Mr. Frederick Eissler
Scenic Shoreline Preservation
Conference, Inc.
4623 More Mesa Drive
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Brent Rushforth, Esq.
Center for Law in the Public
Interest
10203 Santa Monica Dr.
Los Angeles, CA 90067



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Office of Executive Legal Director
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U.S. Nuclear Regulatory Commission
Washington, D.C.

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Helen J. Donovan

