

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



In the Matter of:

PACIFIC GAS & ELECTRIC COMPANY

(Diablo Canyon Nuclear Power  
Plant, Units 1 & 2)

12/3/78

Docket Nos. 50-275-  
50-323 OL

INTERVENORS' SECOND SUPPLEMENTAL  
RESPONSE TO APPLICANT'S INTERROGATORIES  
DATED SEPTEMBER 27, 1978

Pursuant to 10 CFR Section 2.740(b), Intervenors SCENIC SHORELINE PRESERVATION CONFERENCE, INC., SAN LUIS OBISPO MOTHERS FOR PEACE, SANDRA SILVER, ECOLOGY ACTION CLUB, and JOHN J. FORSTER hereby file INTERVENORS' SECOND SUPPLEMENTAL RESPONSE TO APPLICANT'S INTERROGATORIES, dated September 27, 1978.

INTERROGATORY 1:

- (1) Give the name, address, telephone number and occupation of each witness you will call to express opinions at the seismic safety hearings presently set in this matter.
  - (a) State the subject matter on which each such expert is expected to testify.
  - (b) State each opinion which each such expert is expected to express in testimony.
  - (c) State the facts to which each such expert is expected to testify.
  - (d) State each assumption, as opposed to fact, upon which the opinions set forth above are based.

SECOND SUPPLEMENTAL RESPONSE:

(1) With respect to the subject matter on which each Joint-Intervenor expert is expected to testify, his opinion, and the facts and assumptions upon which that opinion is based, the response to the interrogatory is superceded by the testimony pre-filed by the Joint-Intervenors for Drs. Silver, Brune, Graham and Mr. Hubbard.

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INTERROGATORY 5:

- (5) State specifically and in detail the opinions upon which Intervenors base each of its seismic safety contentions in these proceedings.

SECOND SUPPLEMENTAL RESPONSE:

- (5) Same as Second Supplemental Response to Interrogatory 1.

INTERROGATORY 6:

- (6) State specifically and in detail the facts upon which Intervenors base each of its seismic safety contentions in these proceedings.

SECOND SUPPLEMENTAL RESPONSE:

- (6) Same as Second Supplemental Response to Interrogatory 1.

INTERROGATORY 7:


- (7) State specifically and in detail the assumptions upon which you base the opinions as reflected in the answer to Interrogatory No. 5 above.

SECOND SUPPLEMENTAL RESPONSE:

- (7) Same as Second Supplemental Response to Interrogatory 1.

Dated: December 5, 1978

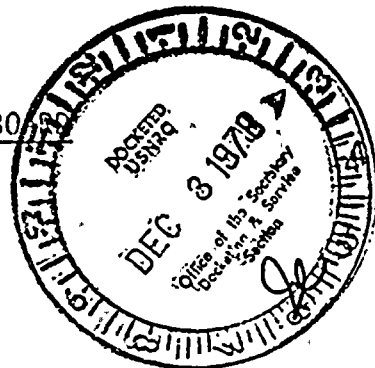
Respectfully submitted,

  
\_\_\_\_\_  
David S. Fleischaker  
Attorney for Intervenors



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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.

CERTIFICATE OF SERVICE

I hereby certify that copies of "INTERVENORS' SECOND SUPPLEMENTAL RESPONSE TO APPLICANT'S INTERROGATORIES dated September 27, 1978, in the above-captioned proceeding, have been served on the following by deposit in the United States mail, first class, this 6th day of December, 1978.

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