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May 2, 1978

Philip A. Crane, Jr., Esq.
Pacific Gas & Electric Company
77 Beale Street, 31st Floor
San Francisco, California 94106

Re: Docket Nos. 50-275 OL
50-323 OL
Diablo Canyon Units 1 & 2

Dear Mr. Crane:

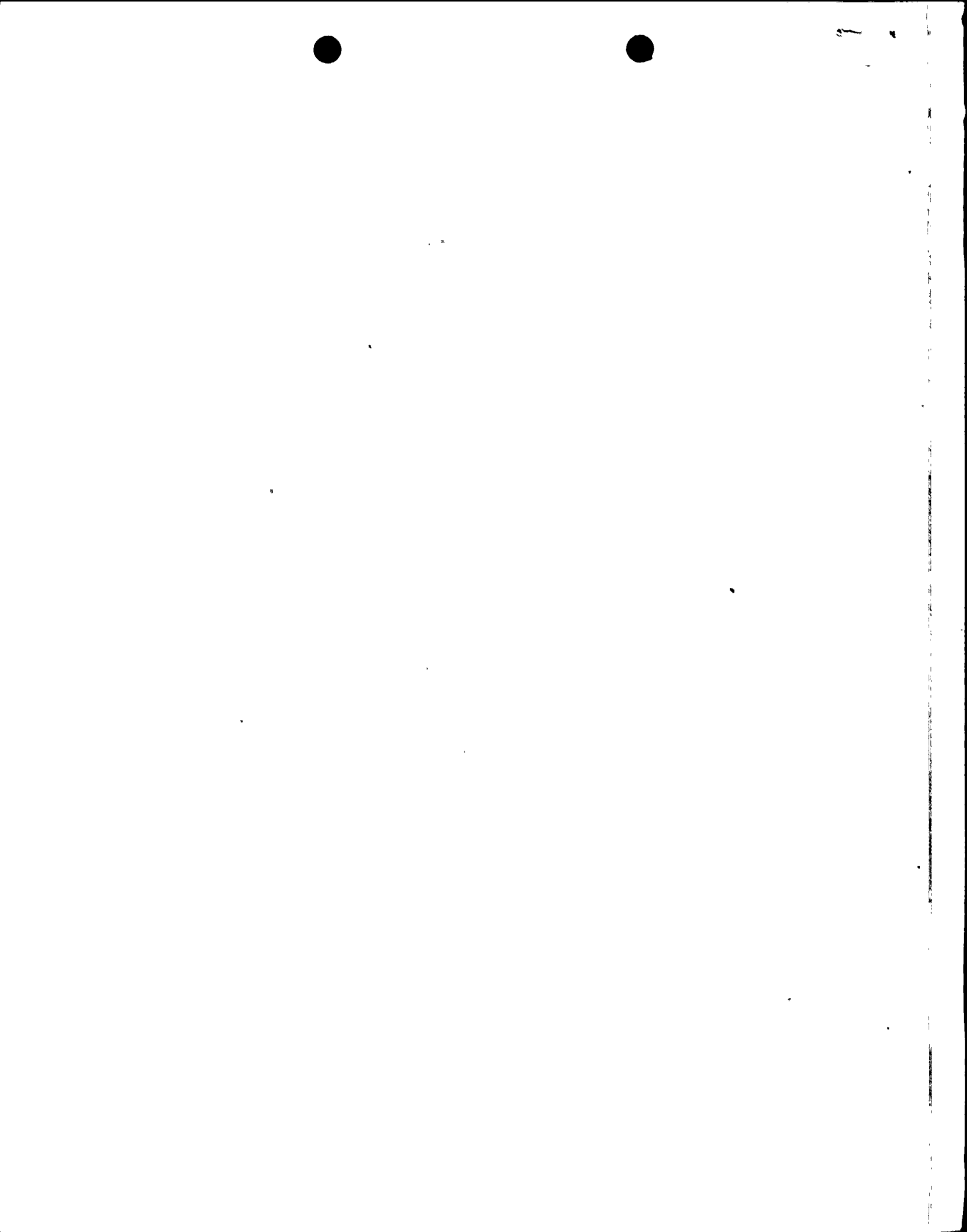
Enclosed please find copies of INTERVENORS' THIRD SET OF INTERROGATORIES TO THE APPLICANT RELATING TO THE ADEQUACY OF THE SEISMIC DESIGN OF THE DIABLO CANYON NUCLEAR POWER PLANT. Copies have been sent to all parties listed on the Certificate of Service in the above captioned case.

Yours very truly,

David S. Fleischaker

David S. Fleischaker, Esq.

cc: All parties of record.



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety & Licensing Board

In The Matter Of:)

PACIFIC GAS & ELECTRIC COMPANY)
(Diablo Canyon Nuclear Power)
Plant, Units 1 & 2))

Dockets Nos. 50-275 OL
50-323 OL

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INTERVENORS' THIRD SET OF INTERROGATORIES
TO THE APPLICANT RELATING TO THE ADEQUACY
OF THE SEISMIC DESIGN OF THE DIABLO CANYON
NUCLEAR POWER PLANT

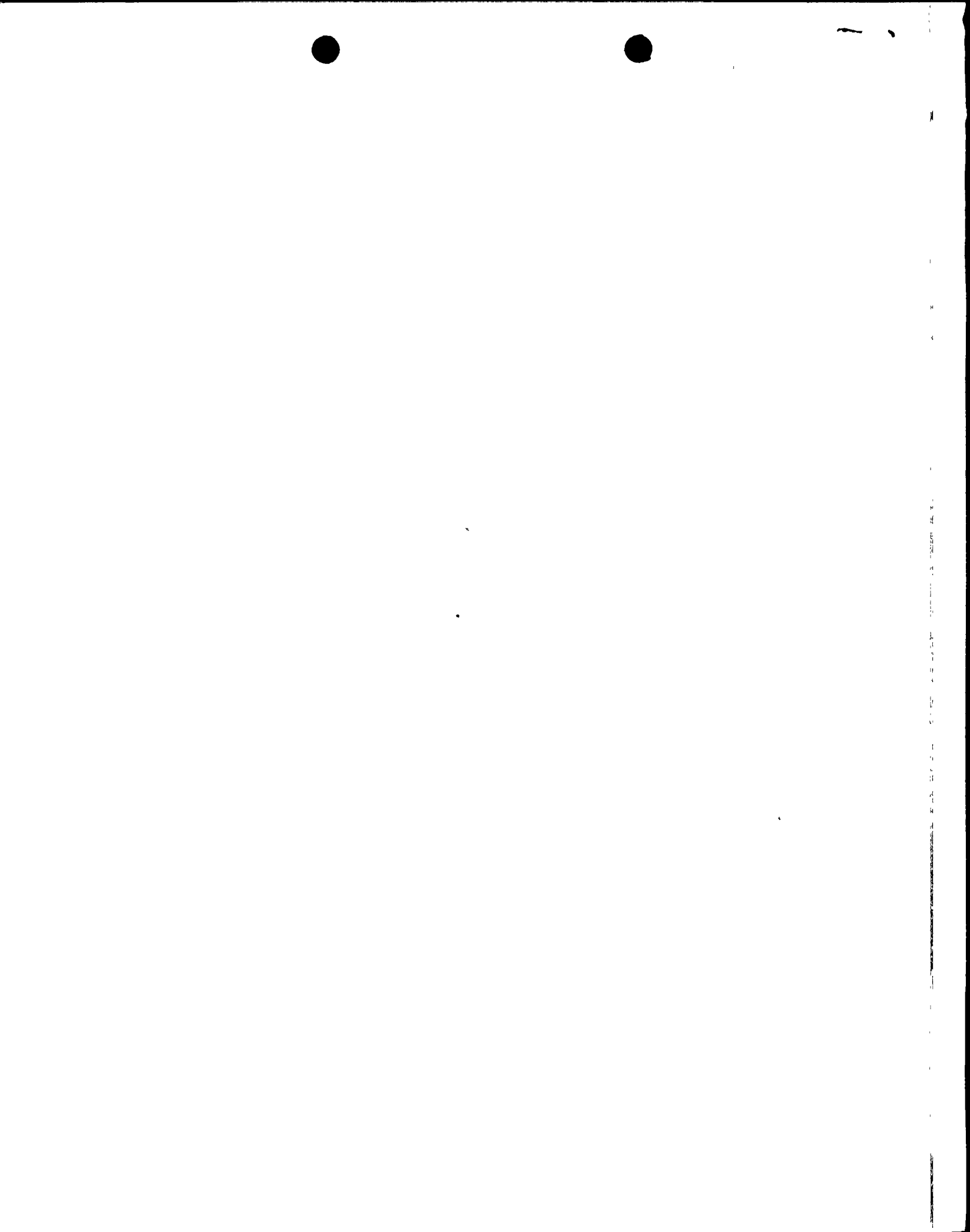
Pursuant to 10 C.F.R. §2.740(b), Intervenor SCENIC SHORELINE PRESERVATION CONFERENCE, INC., SAN LUIS OBISPO MOTHERS FOR PEACE, SANDRA SILVER, ECOLOGY ACTION CLUB and JOHN J. FORSTER request Pacific Gas & Electric Company ("Applicant") to answer the interrogatories set out below.

Instructions

1. Each interrogatory is to be answered separately and fully in writing under oath or affirmation by the officer of, employee of, or consultant to the Applicant who has personal knowledge thereof.

2. In case of an objection, the reasons for the objection shall be stated in full.

3. Answers and/or objections to these interrogatories are due May 15, 1978.



Definitions

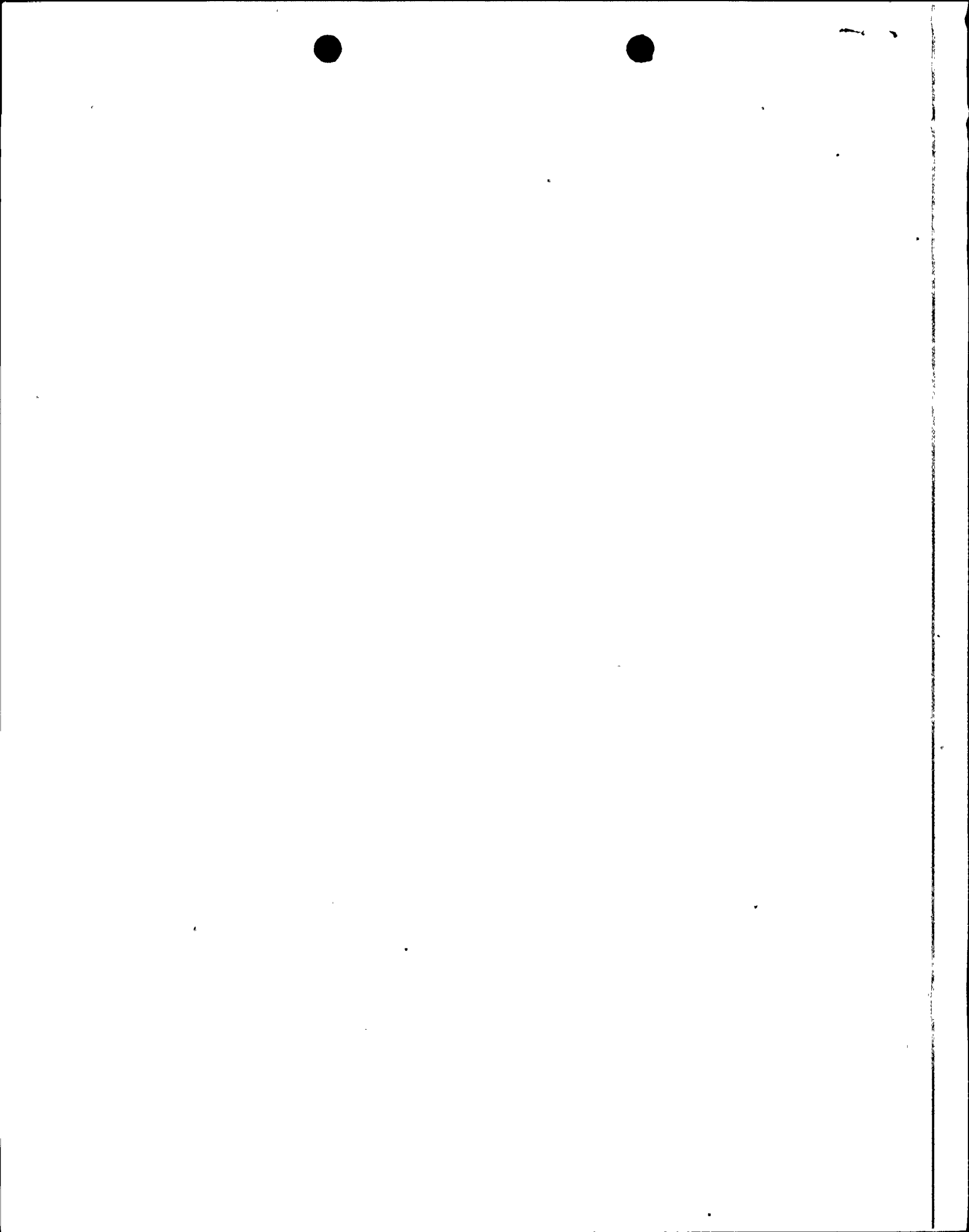
1. "Category I" refers to those structures, systems and components necessary to assure (a) the integrity of the reactor coolant pressure boundary; (b) the capability to shut down the reactor and maintain it in a safe shutdown condition, or (c) the capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the guidelines exposures of 10 C.F.R. §100.

2. "Magnitude" means the numerical value on the Richter Scale.

Interrogatories

1. State whether the Applicant, its employees, or consultants are aware of any current geological or geophysical investigation which has revealed information which may be relevant to the determination required by 10 C.F.R. §100, Appendix A. If so, state in detail the nature of the investigation(s); identify who is conducting the investigation(s); identify any findings which may be relevant to the determinations required by 10 C.F.R. §100, Appendix A.

2. Identify all Category I structures, systems and components for which the stresses and deflections caused by a 7.5 Magnitude earthquake on the Hosgri Fault will exceed the limits of the linear material response.



3.

Respectfully submitted,

JOHN R. PHILLIPS
SIMON KLEVANSKY
MARGARET BLODGETT
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SANDRA A. SILVER
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By:

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David S. Fleischaker, Esq.

