

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
Units 1 and 2) |
) |
Diablo Canyon Site) |
) |
_____) |

RESPONSE OF PACIFIC GAS AND ELECTRIC COMPANY
TO MOTION TO COMPEL DISCOVERY DATED
OCTOBER 3, 1975

The San Luis Obispo Mothers for Peace (MFP) Motion to Compel Discovery dated October 3, 1975, was mailed in an envelope postmarked October 6, 1975, which was the date used to calculate the time within which to respond.

RESPONSE

PGandE submits that the Motion is not well taken and that it should be denied.

1. The information requested by the interrogatories in question which concerns the experience at Humboldt Bay, is not relevant to this proceeding. The fact that something may or may not have happened at Humboldt Bay is not precedent for the same thing happening at Diablo Canyon. The two plants have different types of reactors, they contain different types of other equipment, and the Humboldt reactor has been in operation since 1963. Thus, responses to the interrogatories will not produce information which can properly be applied to this proceeding.
2. The interrogatories request information outside the scope of the MFP Petition to Intervene. The Board's order dated May 30, 1974 did not accept contention 1.B for purposes of discovery. In addition, the MFP would have no standing to explore on-site doses to employees. Their interest should be limited to off-site doses.

Respectfully submitted,

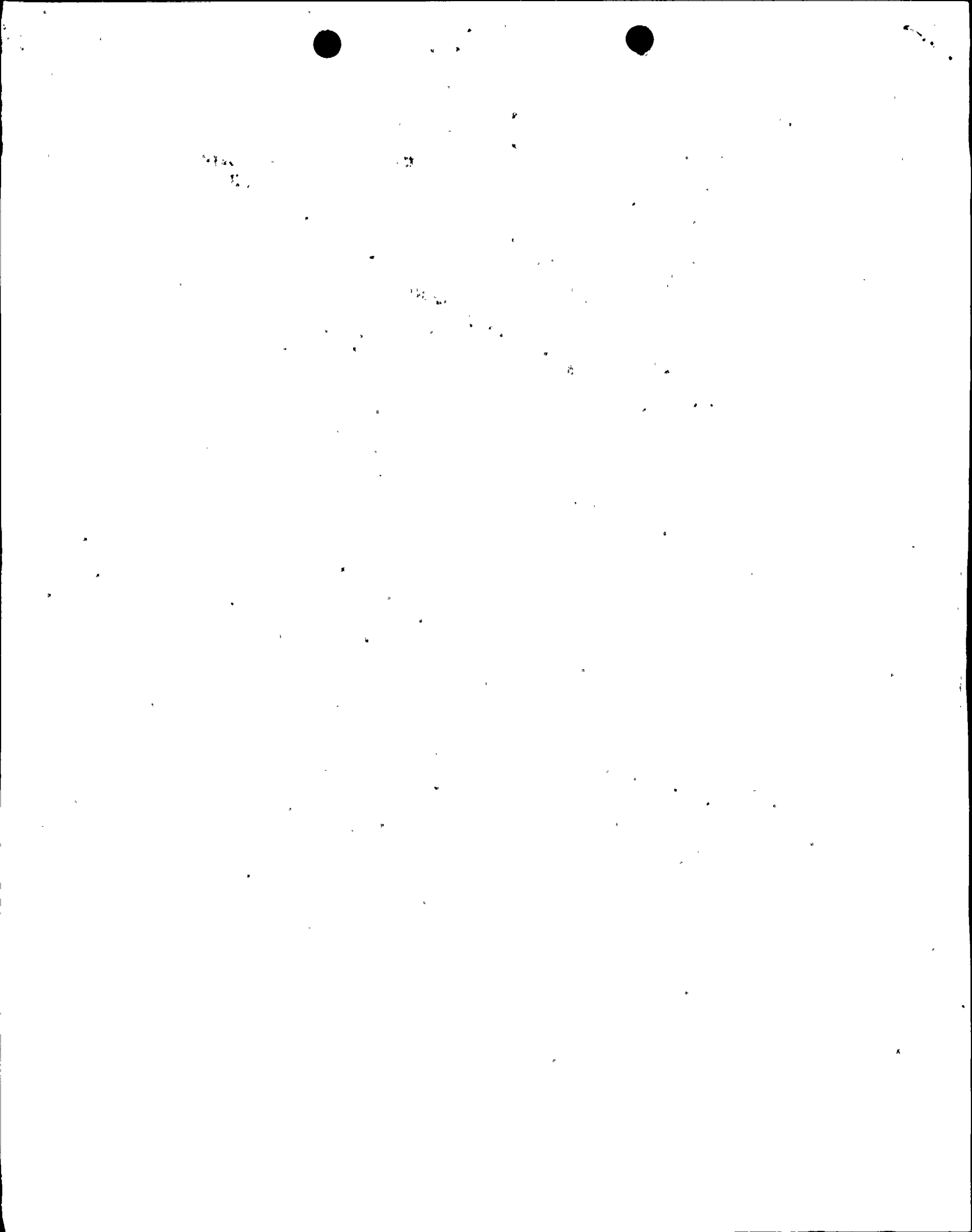
Attorneys for
PACIFIC GAS AND ELECTRIC CO.
77 Beale Street
San Francisco, CA. 94106
(415) 781-4211

JOHN C. MORRISSEY
PHILIP A. CRANE, JR.
DENNIS C. SULLIVAN
BRUCE R. WORTHINGTON

By


Philip A. Crane, Jr.

Dated: October 17, 1975



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

Docket Nos. 50-275-OL
50-325-OL

CERTIFICATE OF SERVICE

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

Mrs. Elizabeth E. Apfelberg
1415 Cazadero
San Luis Obispo, California 93401

James R. Tourtellotte, Esq.
Office of Executive Legal Director
BETH 042
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Elizabeth S. Bowers, Esq.
Chairman
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Landow Building - Room 1209
Washington, D. C. 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Landow Building - Room 1209
Washington, D. C. 20555

Mr. William P. Cornwell
P. O. Box 453
Morro Bay, California 93442

Mr. Frederick Eissler
Scenic Shoreline Preservation
Conference, Inc.
4623 More Mesa Drive
Santa Barbara, California 93110

Ms. Raye Fleming
1746 Chorro Street
San Luis Obispo, California 93401

Mr. John J. Forster
C/o Mr. Gordon Silver
5055 Radford Avenue
North Hollywood, California 91607

Director
Division of Reactor Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

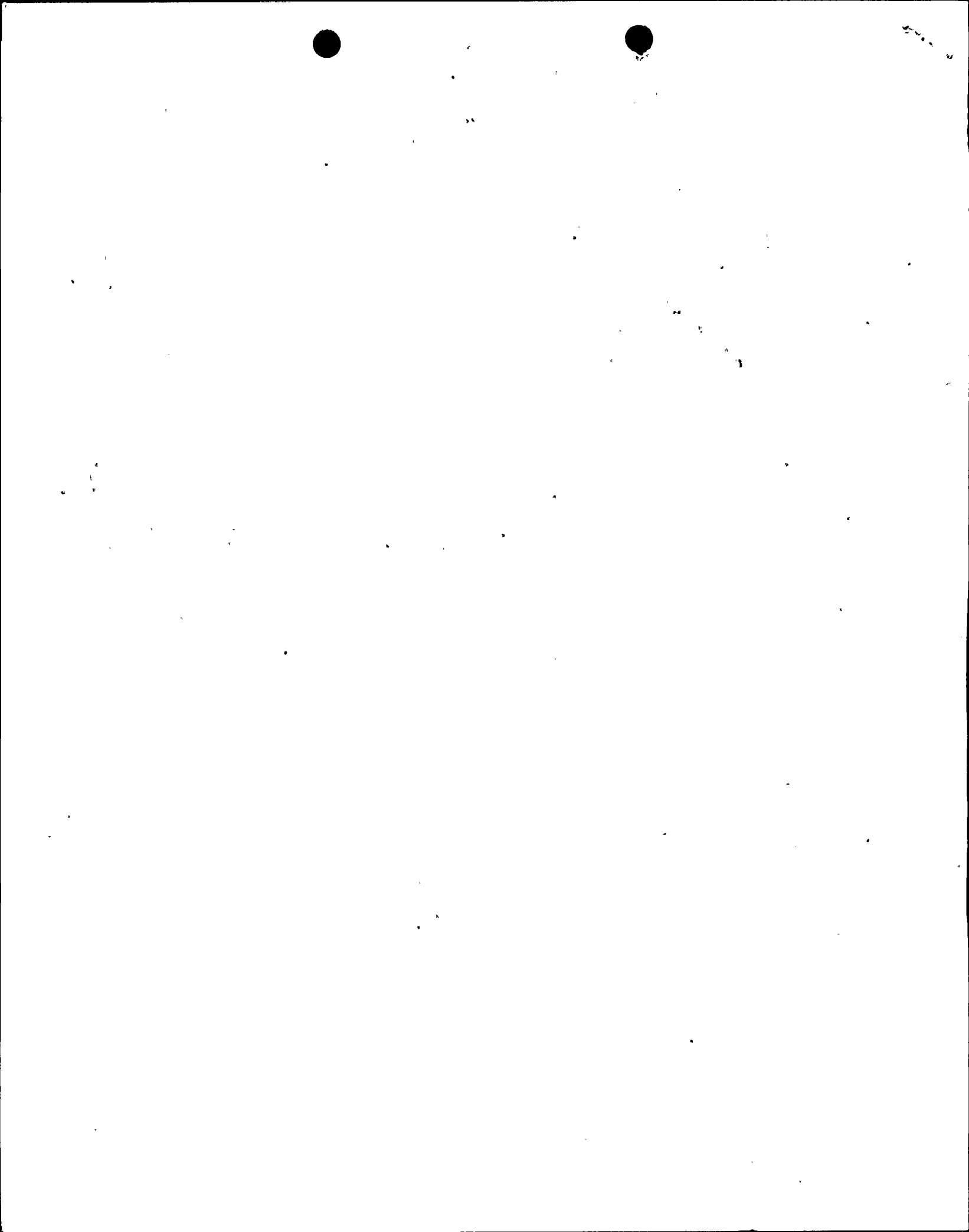
Nathaniel H. Goodrich, Esq.
Chairman
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory Commission
Landow Building - Room 1209
Washington, D. C. 20555

Dr. William E. Martin
Atomic Safety and Licensing Board
Senior Ecologist
Battelle Memorial Institute
Columbus, Ohio 43201

Alan S. Rosenthal, Esq.
Chairman
Atomic Safety and Licensing
Appeal Panel
U. S. Nuclear Regulatory Commission
Landow Building - Room 1209
Washington, D. C. 20555

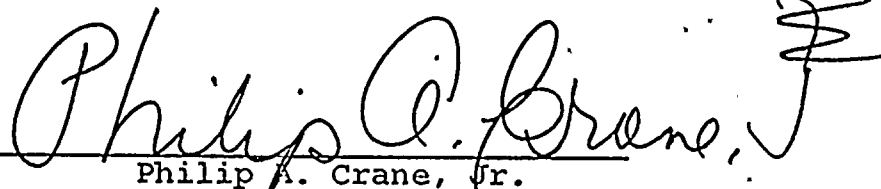
Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn.: Docketing and Service Section



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

Andrew Skaff, Esq.
Counsel
Public Utilities Commission
of the State of California
5066 State Building
San Francisco, California 94102

A handwritten signature in cursive script that reads "Philip A. Crane, Jr." with a stylized flourish at the end.

Philip A. Crane, Jr.
Attorney
Pacific Gas and Electric Company

Dated: October 17, 1975

