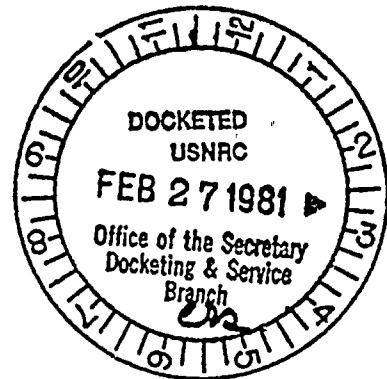


2/27/81

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION



2/27/81

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

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

JOINT INTERVENORS' RESPONSE TO NRC STAFF'S  
FEBRUARY 23, 1981 REQUEST FOR DIRECTED CERTIFICATION

On February 23, 1981, the NRC Staff filed a Request For Directed Certification before the Nuclear Regulatory Commission seeking clarification of the Commission's December 18, 1980 Revised Statement of Policy, entitled "Further Commission Guidance For Reactor Operating Licenses," CLI-80-42, 45 Fed. Reg. 85236.

At a prehearing conference held in the Diablo Canyon Nuclear Power Plant low power test proceeding on January 28 and 29, 1981, Joint Intervenors made a similar request to the licensing board for certification of a clarifying question to the Commission concerning the December 18 Policy Statement. That request was denied by order of the board on February 13, and Joint Intervenors filed a timely notice of objections to that order on February 18.

Because of the importance of the document in issue, the serious legal questions involved, and the significant disagreement among all parties and the board as to interpretation of the document, Joint Intervenors support the Staff's Request For Directed Certification and suggest that the following briefing schedule be established

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by the Commission: simultaneous filing of briefs by all parties 21 days after the Commission grants directed certification, simultaneous filing of reply briefs 10 days later, and oral argument before the Commission 7 days after reply briefs are due.

Dated: February 27, 1981

Respectfully submitted,

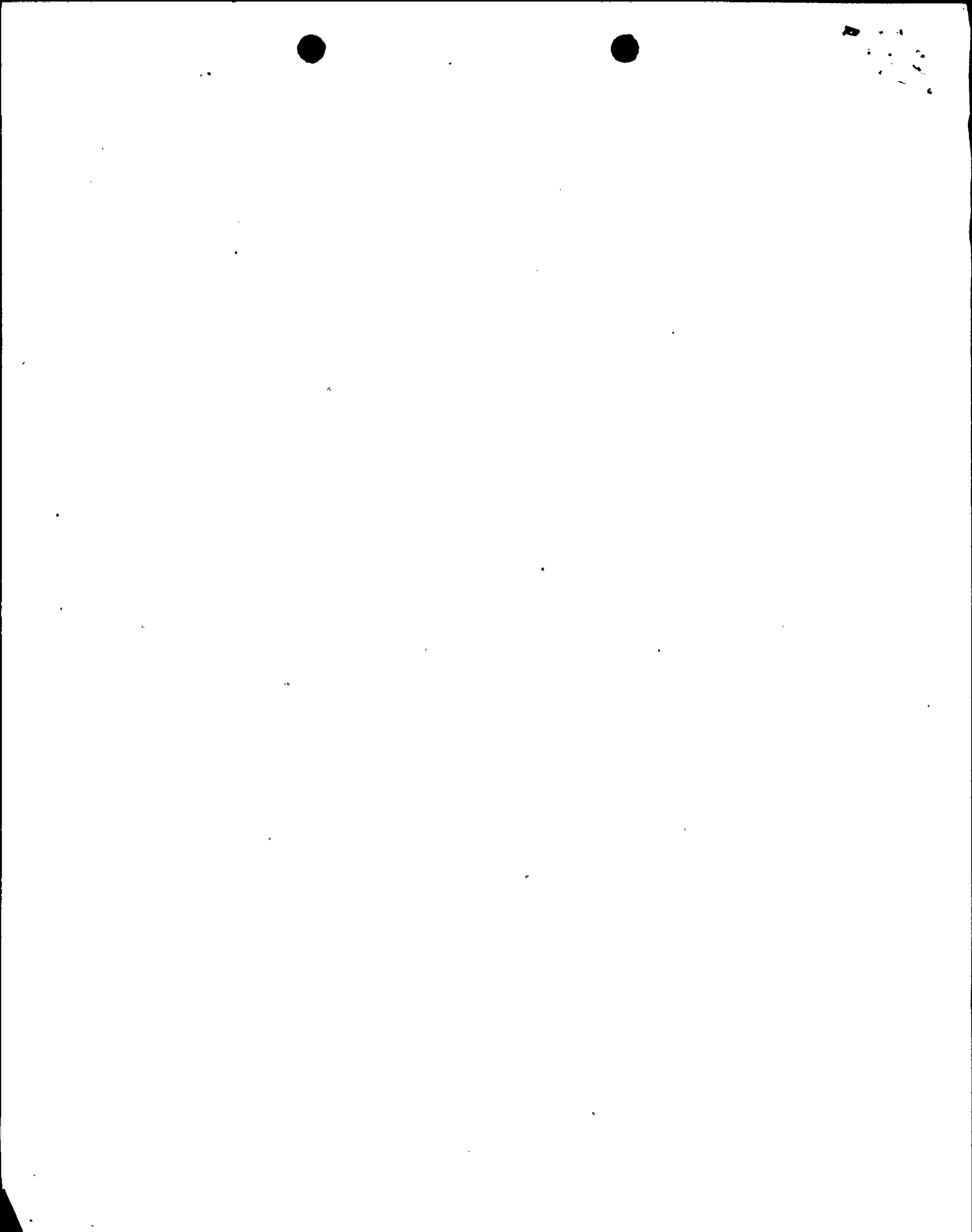
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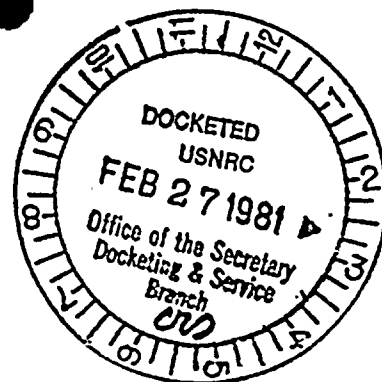
By

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE COMMISSION



In the Matter of: )

PACIFIC GAS & ELECTRIC )  
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CERTIFICATE OF SERVICE

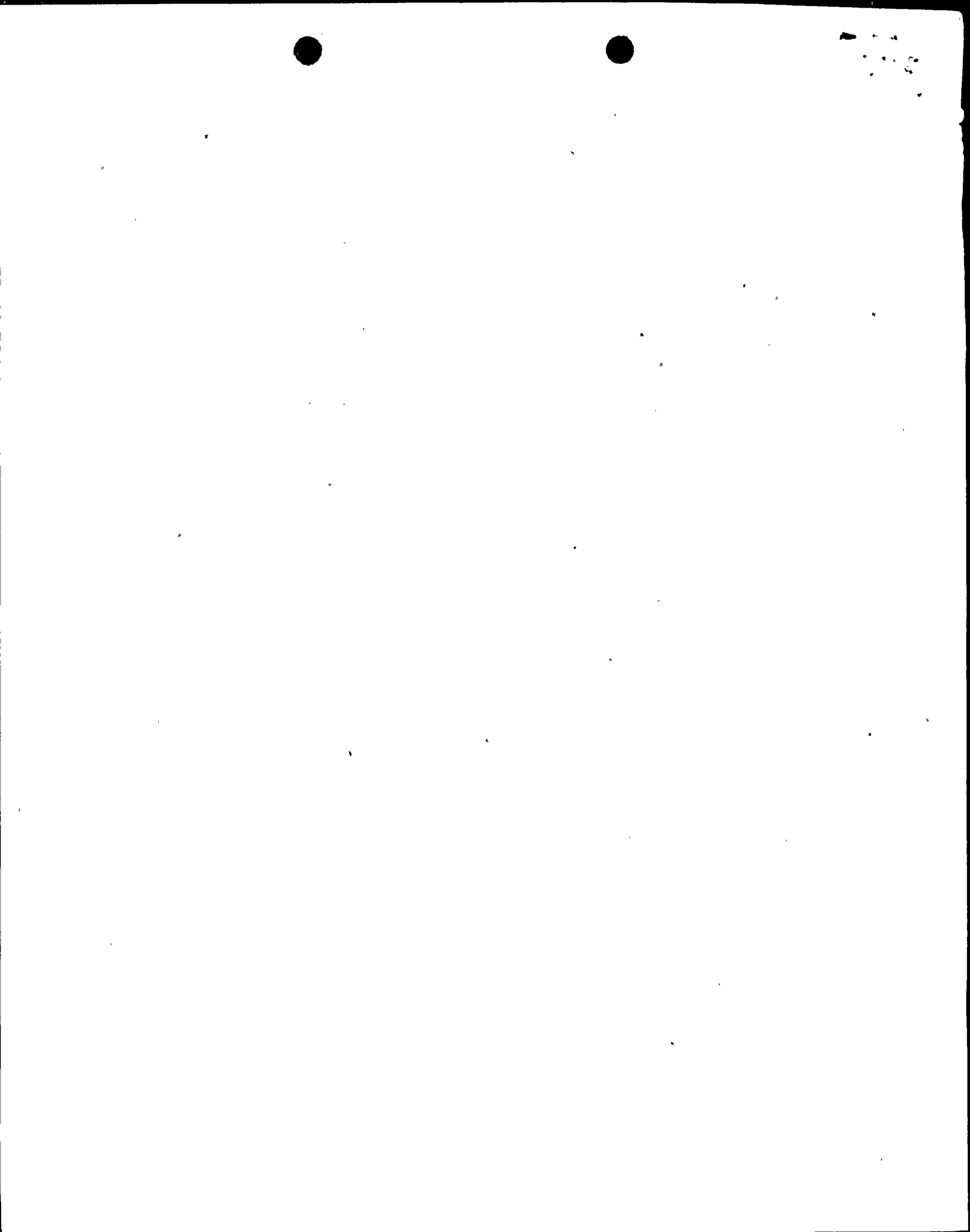
I hereby certify that on this 27th day of February, 1981, I have served copies of the foregoing Joint Intervenors' Response to NRC Staff's February 23, 1981 Request for Directed Certification, mailing them through the U.S. Postal Service, first class, postage prepaid, and hand delivered to those parties designated by an asterisk.

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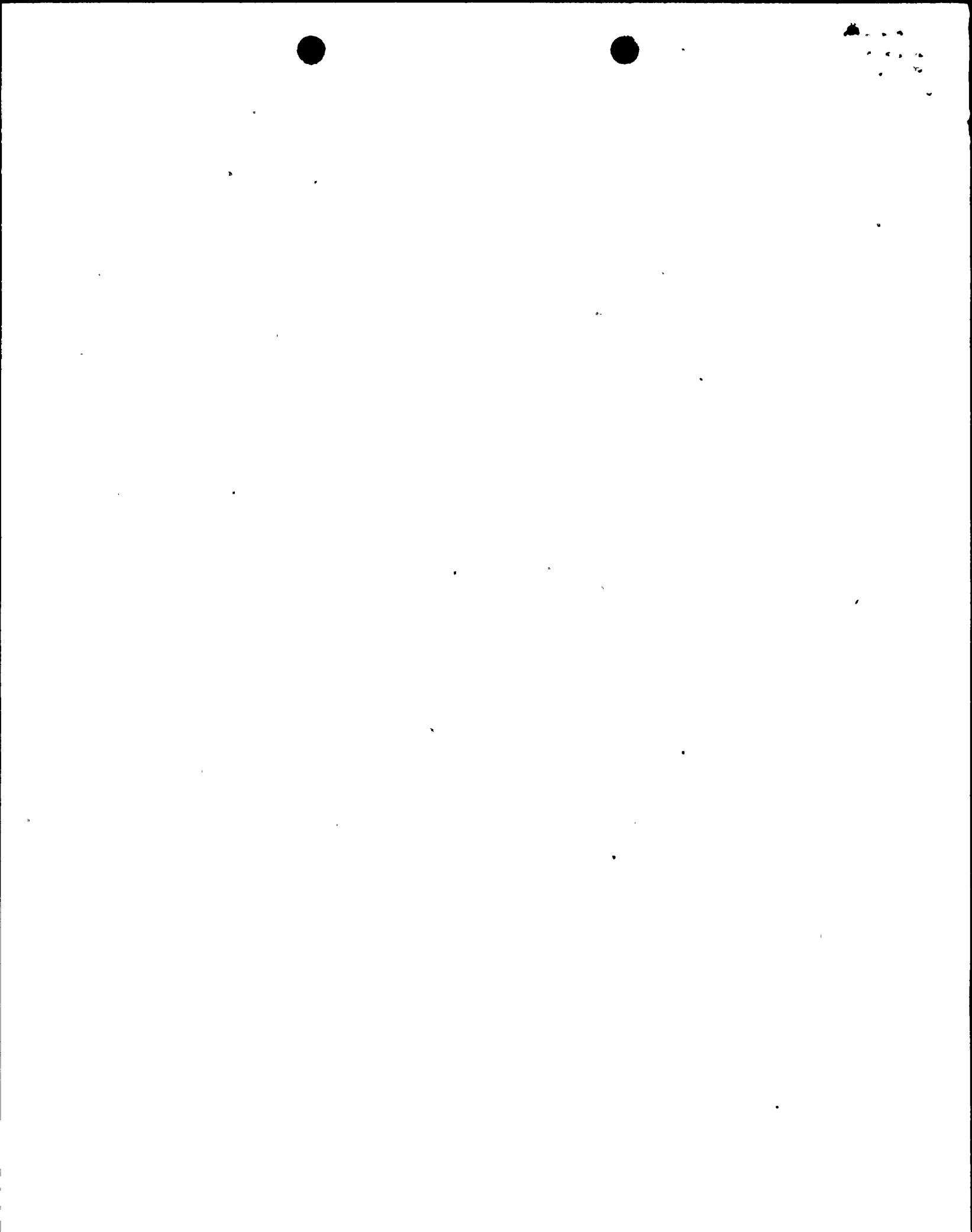
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