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August 15, 1979



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SUBJECT: Pacific Gas & Electric Company, Stanislaus Nuclear Project, Unit No. 1, NRC Docket No. P-564A

Dear Bill:

This will confirm our conversation in which we agreed that NCPA would begin the "one massive sweep" member city discovery in Santa Clara and would work our way through the member cities thereafter as appeared best designed most efficiently to produce necessary discovery. We again offer to attempt to work out variances in the order of cities if you decide at any time that you wish discovery to proceed with respect to a particular city, if this can be worked out consistent with efficient production on our part. So far, my understanding is that you have no particular preference following Santa Clara.

We have also agreed that documents that have already been produced to PG&E in the several FERC proceedings (Docket Nos. E7796, E7777(II), ER76-532, and Helms Creek) would not also be produced in this docket, since you already have your copy of those materials in your computer bank, and previously coded, to avoid the unnecessary time delay and cost associated with duplicated production. Thus, documents which are numbered in those cases will not be recopied. If duplicates exist which are found not to have been numbered or produced, they will now be numbered and produced.

We currently expect that there is some likelihood that we may be able to begin in Santa Clara the end of this week, and if that turns out to be impossible, no later than the beginning of next week. With those dates in mind, please let me know if you have any further procedural ideas which might reduce possible areas of friction in the future.

Yours very truly,

RA
Robert C. McDiarmid

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cc: Jack Fallin, Esq.
All Parties

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