

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

|                                |   |                              |
|--------------------------------|---|------------------------------|
| In the Matter of               | ) |                              |
|                                | ) |                              |
| PUGET SOUND POWER & LIGHT      | ) | DOCKET NOS. STN 50-522       |
| COMPANY, et al.,               | ) | 50-523                       |
|                                | ) |                              |
| (Skagit Nuclear Power Project, | ) | INTERVENORS' INTERROGATORIES |
| Units 1 and 2)                 | ) | AND REQUEST FOR PRODUCTION   |
|                                | ) | TO NRC STAFF DATED           |
|                                | ) | JANUARY 9, 1979.             |
|                                | ) |                              |

In accordance with 10 CFR §2.471 and 10 CFR §2.741, please answer the following interrogatories and respond to the accompanying requests for production.

Interrogatory No. 1: Please describe all material referred to in the following sentence appearing on page 20-1, paragraph 20.1, of Supplement No. 1, to the "Safety Evaluation Report Related to Construction of Skagit Nuclear Power Project, Units 1 and 2" dated October, 1978:

"Applicants have submitted financial information in support of their Application."



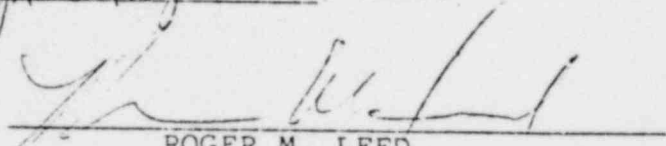
Interrogatory No. 2: Please describe specifically all computations, analyses, work sheets, and other documents prepared or utilized by staff in connection with preparing the information reflected in Section 20.1, "Financial Qualifications", in the "Safety Evaluation Report Related to Construction of Skagit Nuclear Power Project, Units 1 and 2", Supplement No. 1, October, 1978, other than documents described in your answer to Interrogatory No. 1.

Request for Production No. 1: Please produce for inspection and copying within thirty days of date at the offices of the plaintiff's counsel all documents described in your answers to the foregoing interrogatories Nos. 1 and 2.

Interrogatory No. 5: Has the USGS, or any other federal agency, conducted any acoustic profiling or seismological studies in the Straits of Georgia, San Juan Islands or Puget Sound during the summer or fall of 1978? If so, describe all such studies, and all documents reflecting the data and conclusions obtained as a result of such studies.

Request for Production No. 2: Please produce for inspection within thirty days of date at the offices of the plaintiffs' counsel all documents described in your answers to the foregoing interrogatories Nos. 3, 4, and 5.

DATED this 7 day of January, 1979.

  
\_\_\_\_\_  
ROGER M. LEED

The following interrogatories are directed to you and to your consultant, the United States Geological Survey.

Interrogatory No. 3: Please describe all documents, correspondence, reports, and memoranda originated by Fred Pessl or any other USGS employee, agent, or consultant regarding Mr. Pessl's studies or observations of quaternary offsets in the vicinity of Lake Cavanaugh.

Interrogatory No. 4: Please describe all instructions, oral and written, to USGS employees, agents and consultants (including Dr. John Whetton and Fred Pessl) which delineate the scope of, and establish any limitations affecting, their field work on behalf of USGS in Washington, including any instructions which relate in any way to the Skagit Nuclear Project. As to written instructions, describe the document reflecting such instructions. As to oral instructions, state the name, job title and address of the person delivering such instructions and the date when delivered.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

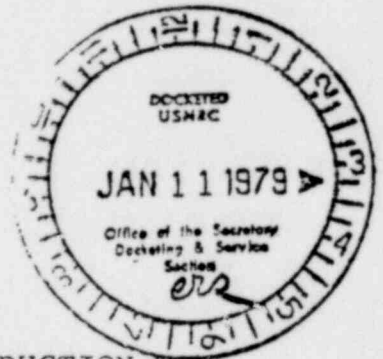
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of )

PUGET SOUND POWER & LIGHT )  
COMPANY, et al., )

(Skagit Nuclear Power Project, )  
Units 1 and 2) )  
\_\_\_\_\_ )

DOCKET NOS. STN 50-522  
50-523



CERTIFICATE OF SERVICE

I hereby certify that copies of:

INTERVENORS' INTERROGATORIES AND REQUEST FOR PRODUCTION TO  
NRC STAFF DATED JANUARY 9, 1979

have been served on the following by depositing the same in  
the United States mail, postage prepaid, on this 9th day of  
January, 1979.

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Certificate - 2

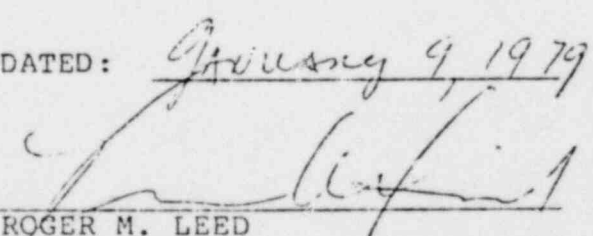
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DATED: January 9, 1979

  
ROGER M. LEED  
Counsel for Intervenors