

Roger M. Leed  
Michael W. Gendler

LAW OFFICES  
ROGER M. LEED  
Fourteen Eleven Fourth Avenue  
Seattle, Washington 98101

November 5, 1979



Phone: 206-382-0217  
Cable: "LEED Seattle"

Valentine B. Deale, Chairman  
Atomic Safety & Licensing Board  
1001 Connecticut Avenue N.W.  
Washington, D.C. 20036

Mr. Chairman:

Pursuant to 10 CFR 2.740, 2.740a, and 2.720, SCANP hereby applies for the issuance of a subpoena requiring the attendance and testimony of an employee of Western Geophysical, to be designated by Western Geophysical, at a deposition upon oral examination to be conducted by counsel for SCANP at a time and place to be determined immediately upon issuance of the subpoena.

The deposition, and hence the subpoena, is necessary because it is now clear that Western Geophysical has in its possession important knowledge and data regarding the geology and seismology of Western Washington, and specifically of the Puget Sound region. SCANP desires to take this deposition because Western Geophysical is the most direct source of this important information, and because the prompt scheduling of such a deposition would greatly facilitate and expedite SCANP's preparation for any forthcoming geology and seismology hearings.

SCANP therefore requests that the Board issue the subpoena as expeditiously as possible, so that the deposition may be had at the earliest convenient time.

Very truly yours,

*Michael W. Gendler*  
Michael W. Gendler  
Counsel for SCANP

MWG:mhh  
cc: Service List

1510 119 70.2060/125

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of )

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

DOCKET NOS. STN 50-522  
50-523

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

CERTIFICATE OF SERVICE

I hereby certify that copies of:

LETTER REQUESTING ISSUANCE OF A SUBPOENA OF  
WESTERN GEOPHYSICAL  
FROM MICHAEL W. GENDLER TO CHAIRMAN DEALE

dated November 5, 1979, have been served on the following  
by depositing the same in the United States mail, postage  
prepaid, on this 5th day of November, 1979.

Valentine B. Deale, Esq., Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory  
Commission  
1001 Connecticut Avenue N.W.  
Washington, D.C. 20036

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. Frank F. Hooper, Member  
Atomic Safety and Licensing Board  
School of Natural Resources  
University of Michigan  
Ann Arbor, MI. 48104

Richard L. Black, Esq.  
Counsel for NRC Staff  
U.S. Nuclear Regulatory  
Commission  
Office of the Executive Legal  
Director  
Washington, D. C. 20555

Gustave A. Linenberger, Member  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Nicholas D. Lewis, Chairman  
Energy Facility Site Evaluation  
Council  
820 East Fifth Avenue  
Olympia, Washington 98504

Certificate - 1

Richard M. Sandvik, Esq.,  
Assistant Attorney General  
Department of Justice  
500 Pacific Building  
520 S. W. Yamhill  
Portland, Oregon 97204

Robert Lowenstein, Esq.  
Lowenstein, Newman, Reis &  
Axelrad  
1025 Connecticut Avenue, N.W.  
Washington, D.C. 20036

James W. Durham, Esq.  
Portland General Electric Co.  
121 S.W. Salmon Street  
TB 17  
Portland, Oregon 97204

CFSP and FOB  
E. Stachon & L. Marbet  
19142 S. Bakers Ferry Road  
Boring, Oregon 97009

Canadian Consulate General  
Peter A. van Brakel  
Vice-Consul  
412 Plaza 600  
6th and Stewart Street  
Seattle, Washington 98101

F. Theodore Thomsen  
Perkins, Coie, Stone, Olsen  
& Williams  
1900 Washington Building  
Seattle, Washington 98101

Alan P. O'Kelly  
Paine, Lowe, Coffin, Herman  
& O'Kelly  
1400 Washington Trust Financial  
Center  
Spokane, Washington 99204

Russel W. Busch  
Evergreen Legal Services  
520 Smith Tower  
Seattle, Washington 98104

Thomas Moser  
Deputy Prosecuting Attorney  
Skagit County Courthouse  
Mt. Vernon, Washington 98273

Warren Hastings  
Portland General Electric Co.  
121 S.W. Salmon Street  
TB 13  
Portland, Oregon 97204

Atomic Safety and Licensing  
Appeal Panel (5)  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

DATED: Nov 5, 1979

ROGER M. LEED

By Michael W. Leed

Certificate - 2