

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
PUGET SOUND POWER & LIGHT)	Docket Nos. 50-522
COMPANY, et al.)	50-523
)	
(Skagit Nuclear Power Project,)	July 6, 1979
<u>Units 1 and 2)</u>)	

APPLICANTS' RESPONSE TO INTERVENOR SCANP'S
 INTERROGATORIES AND REQUESTS FOR PRODUCTION
 TO PUGET SOUND POWER & LIGHT COMPANY AND OTHER
 APPLICANTS DATED JUNE 25, 1979

On June 25, 1979 Intervenor SCANP served its "Interrogatories and Requests for Production to Puget Sound Power & Light Company and other Applicants" dated June 25, 1979.

Applicants' object to these interrogatories and requests on the ground that they are untimely. They were not served by the June 1, 1979 deadline for initial discovery requests that was fixed at the April 24, 1979 conference. Tr. 11,945-949. Furthermore, they do not constitute follow up requests prompted by Applicants' responses served June 19, 1979 to SCANP's previous discovery requests that would be permitted within the 10-day period fixed for follow up requests.. Id. These interrogatories and requests relate to the possible formation of a subsidiary company and evidently stem from a newspaper article of June 7,

1979. Clearly they do not stem from nor were they prompted by Applicants responses of June 19, 1979. Accordingly they are untimely.

Additionally, Applicants object to these interrogatories and requests on the ground that the information sought falls outside the permissible scope of discovery under 10 CFR 2.740(b) in that it does not relate to any matter in controversy in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence. As is apparent from Applicants' Testimony on Financial Qualifications filed June 1, 1979, Applicants, in demonstrating their ability to finance the Skagit Project, do not rely on the benefits that might result from (a) the adoption of regional power legislation, (b) the formation of a subsidiary company, or (c) the purchase by the Bonneville Power Administration of the output of the Skagit units. To the contrary, Applicants have demonstrated their ability to finance the Skagit Project without regional power legislation, use of a subsidiary company, or purchase of the output by BPA.

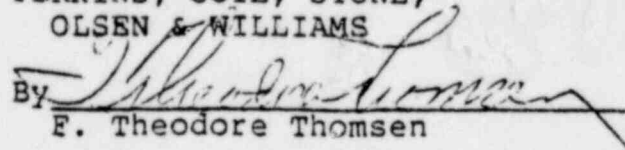
DATED: July 6, 1979

Of Counsel:

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Respectfully submitted,

PERKINS, COIE, STONE,
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By 
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NUCLEAR REGULATORY COMMISSION

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PUGET SOUND POWER & LIGHT COMPANY,)	DOCKET NOS.
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(Skagit Nuclear Power Project,)	50-523
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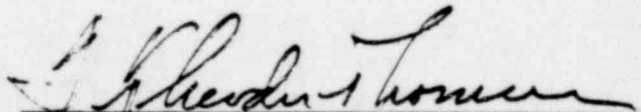
CERTIFICATE OF SERVICE

I hereby certify that the following:

APPLICANTS' RESPONSE TO INTERVENOR SCANP'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION
TO PUGET SOUND POWER & LIGHT COMPANY AND OTHER
APPLICANTS DATED JUNE 25, 1979

in the above-captioned proceeding have been served upon the
persons shown on the attached list by depositing copies thereof
in the United States mail on July 6, 1979 with proper
postage affixed for first class mail.

DATED: July 6, 1979



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7/6/79