

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

Roger M. Leed
Mercede V. Gencor

Phone 206-382-0217
Cable "LEED Seattle"

October 25, 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



Re: Skagit Nuclear Power Project, Units 1 & 2
Dockets No. STN 50-522, 50-523

Dear Chairman Deale:

As indicated in the October 16, 1979 letter of Richard Black, "certain individuals who advised the U.S.G.S. of the field work in the Skagit area . . . will be available if the Board or the parties so desire." Below is the list of such witnesses whom we request be called to testify:

- | | | |
|----|---|--|
| 1. | D. P. Dethier
1107 N.E. 45th St.
Suite 125
Seattle, WA 98105 | U.S.G.S expert on the pleistocene geology of the Skagit Valley, and co-author of U.S.G.S. Open File Report 79-1468 |
| 2. | J.T. Whetten
1107 N.E. 45th St.
Suite 125
Seattle, WA 98105 | U.S.G.S expert on bedrock geology of the Skagit Valley, and co-author of U.S.G.S. Open File Report 79-1468 |
| 3. | J. P. Minard
1107 N.E. 45th St.
Suite 125
Seattle, WA 98105 | U.S.G.S. expert who studied deformed lake sediments near Lake Cavanaugh and concluded that they were faulted. Apparently he has noted some discrepancies between what he found and what the Applicants later reported to have found. |

1423 143

7911290 431

Valentine B. Deale, Esq., Chairman
Atomic Safety and Licensing Board
October 25, 1979
Page Two

4. H. D. Gower
U.S. Dept. of Interior
Geological Survey
Middlefield Road
Menlo Park, CAL 94025
Has compiled the first and only neotectonic map of Western Washington (U.S.C.S. Open File Report 78-426).

The following witnesses, although they may not have specifically advised the U.S.G.S. of their field work, have knowledge which is essential to facilitate an adequate understanding of the Skagit Valley geology and seismology. Witnesses Stepp, Ryan and Loveseth are not employees of the U.S.G.S., and will require formal subpoenas. As specified in 10 CFR Sec. 2.720(a), a showing of general relevance is included.

1. Carl Stepp
Fugro, Inc., Consulting
Engineers & Geologists
3777 Long Beach Blvd.
Long Beach, CAL
Dr. Stepp is the chief geologist for the advisory report to Seattle City Light on the Copper Creek Dam. The relevance of this report is outlined in the prefiled testimony of Dr. Cheney. Briefly, the report predicts ground motions of .7g from an event similar to the 1872 earthquake.
2. Dr. Barry Ryan
Geophysics Department
University of British
Columbia
Vancouver, B.C.
Canada
Dr. Ryan has worked on the Canadian portion of the Straight Creek - Fraser River Fault Zone. He has evidence that this fault cuts the Chilliwack Batholith and may well be active.
3. Timothy Loveseth
Narmco, Inc.
10546 West Sundance
Mt. Littleton, Colorado
Mr. Loveseth has evidence that the Devil's Mountain fault is a major fault and that it is connected to the Leech River fault on Vancouver Island.
4. J.C. Savage
U.S. Dept. of Interior
Geological Survey
345 Middlefield Rd.
Menlo Park, CAL 94025
Dr. Savage is the authority on the 1946 earthquake. He has information which suggests with a 99% confidence level that surface deformation exists as a result of this earthquake. Compare the U.S.G.S. review team position, that no evidence exists to suggest that the 1946 earthquake is shallow.

Valentine B. Deale, Esq., Chairman
Atomic Safety and Licensing Board
October 25, 1979
Page Three

5. C. Wentworth
U.S. Dept. of Interior
Geological Survey
345 Middlefield Rd.
Menlo Park, CAL 94025

Dr. Wentworth is in charge of neotectonic analysis of Washington. He is familiar with the standards for neotectonic mapping, standards which SCANP contends have not been met.

6. David L. Jones
U.S. Dept. of Interior
Geological Survey
345 Middlefield Rd.
Menlo Park, CAL 94025

Noted authority on West Coast geology and tectonics.

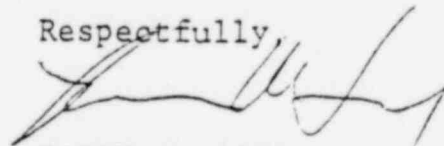
7. D. M. Boone
U.S. Geological Survey
345 Middlefield Rd.
Menlo Park, CAL 94025

Seismologist, senior author of U.S.G.S. Circular 795 that evaluates strong ground motion of earthquakes. He has concluded that 0.35 is commonly exceeded by nearby earthquakes.

8. C. Blake
U.S. Dept. of Interior
Geological Survey
345 Middlefield Rd.
Menlo Park, CAL 94025

Ex-branch chief of Western Environmental Geology for U.S. Geological Survey. He has expressed grave doubts over the validity of concluding that 0.35g is an appropriate level for the safe shut-down earthquake at the Skagit Plant.

Respectfully,



ROGER M. LEED
Counsel for SCANP

jk

cc: Service List

1423 145