PDR

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 12, 1979

William H. Armstrong, Esq.
McCutchen, Doyle, Brown & Enersen
Three Embarcadero Center, 28th Floor
San Francisco, California 94111

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

Dear Mr. Armstrong:

In the footnote on the first page of PG&E's March 2nd Answer opposing the intervenors' motions for a protective order, you stated that Staff agreed to answer the interrogatories voluntarily "unless they raised specific objections after a reasonable opportunity to examine the interrogatories." I believe that statement misstates the nature of the stipulation we have. Specifically, the stipulation does not require the Staff to raise specific objections after a reasonable time. The stipulation, as approved by the Board, is simply that of the Staff's "willingness to read over these interrogatories and on a voluntary basis provide whatever information I can ... at whatever point it becomes available to the staff." Tr. at 2219. In your own words, "I had understood [Mr. Goldberg] to say that the Staff after reviewing them would consider voluntarily responding at some point, whether it is voluntary or otherwise." Tr. at 2219-20. These statements correctly reflect the stipulation approved by the Board. See Tr. at 2220.

Let me assure you that the Staff will voluntarily respond to the interrogatories at the appropriate time as indicated at the prehearing conference.

Very truly yours,

Jack R. Goldberg
Counsel for NRC Staff

cc: All parties on Service List

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