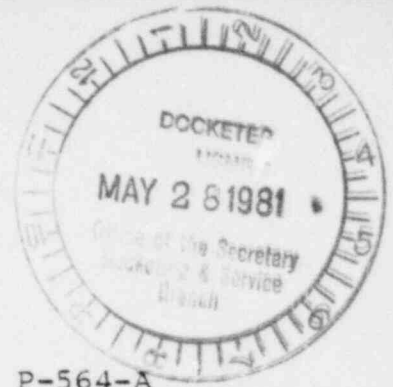


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

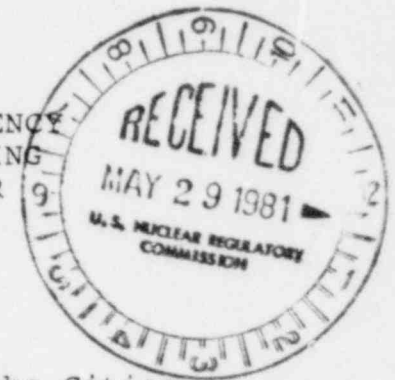


In the Matter of)
)
PACIFIC GAS AND ELECTRIC COMPANY)
)
(Stanislaus Nuclear Project,)
Unit No. 1))
_____)

Docket No. P-564-A

5/28/81

JOINT RESPONSE BY NORTHERN CALIFORNIA POWER AGENCY
AND THE CITIES OF ANAHEIM AND RIVERSIDE OPPOSING
PACIFIC GAS AND ELECTRIC COMPANY'S MOTION FOR
A PROTECTIVE ORDER REGARDING PRODUCTION
OF DOCUMENTS




The Northern California Power Agency and the Cities of Anaheim and Riverside, California, (all referred to collectively herein as "Cities"), intervenors in this proceeding, hereby answer and oppose the Motion by Pacific Gas and Electric Company ("PG&E") for a Protective Order Regarding Production of Documents, dated May 13, 1981.

PG&E's motion requests that the Board "grant permission to continue the status quo" as to discovery until the Board rules on the joint motion of PG&E and Staff to suspend. The status quo, however, is that PG&E is under a continuing obligation to produce documents. What PG&E seeks is a change in the legal status quo which would relieve it of its continuing obligation to produce. PG&E has advanced no good reason why it should be relieved of that obligation

unless one assumes that the joint motion, opposed by all intervenors, is to be granted. Even if the joint motion to suspend is granted, PG&E will not be relieved of its discovery obligations; performance under those obligations would be merely postponed. No one has suggested the discovery would not eventually be necessary in any event; hence, no undue burden or expense would be avoided by granting the instant motion for a protective order.

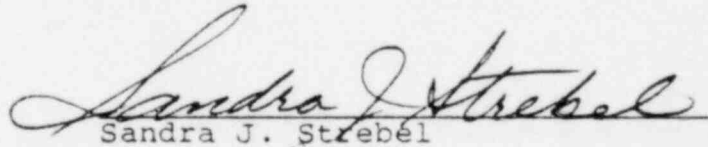
Therefore, Cities oppose PG&E's motion and urge that it be denied.

Respectfully submitted,

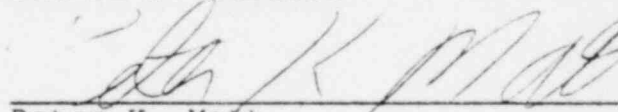


Robert C. McDiarmid

Attorney for the Northern
California Power Agency and its
Members.



Sandra J. Strebél



Peter K. Matt

Attorney for the Cities of
Anaheim and Riverside,
California.

May 28, 1981

Law Offices Of:

Spiegel & McDiarmid
2600 Virginia Avenue, NW
Washington, D.C. 20037
(202) 333-4500

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
Pacific Gas & Electric Company) NRC Docket No. P-564-A
(Stanislaus Nuclear Project,)
Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of the JOINT RESPONSE BY NORTHERN CALIFORNIA POWER AGENCY AND THE CITIES OF ANAHEIM AND RIVERSIDE OPPOSING PACIFIC GAS AND ELECTRIC COMPANY'S MOTION FOR A PROTECTIVE ORDER REGARDING PRODUCTION OF DOCUMENTS in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class postage prepaid, this 28th day of May, 1981.

Marshall E. Miller, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Seymour Wenner, Esq.
Atomic Safety and Licensing Board
4807 Morgan Drive
Chevy Chase, Maryland 20015

Sheldon J. Wolfe, Esq.
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Donald A. Kaplan, Esq.
P.O. Box 14141
Washington, D.C. 20044

Jerome Saltzman, Chief
Utility Finance Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Philip A. Crane, Jr., Esq.
Glen West, Esq.
Richard L. Meiss, Esq.
Pacific Gas & Electric Company
P.O. Box 7442
San Francisco, California 94106

Clarice Turney, Esq.
3900 Main Street
Riverside, California 92521

Joseph Rutberg, Esq.
Benjamin H. Vogler, Esq.
Jack R. Goldberg, Esq.
NRC Staff Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

George Deukmejian, Esq.
Attorney General of California
Michael J. Strumwasser
Deputy Attorney General of
California
3580 Wilshire Boulevard
Suite 600
Los Angeles, California 90010

H. Chester Horn, Jr.
Deputy Attorney General
Office of the Attorney General
3580 Wilshire Blvd., Suite 800
Los Angeles, California 90010

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

Morris M. Doyle, Esq.
William H. Armstrong, Esq.
Terry J. Houlihan, Esq.
Meredith J. Watts, Esq.
Jane E. Cosgriff, Esq.
McCutchen, Doyle, Brown & Enersen
Three Embarcadero Center
28th Floor
San Francisco, California 94111



Robert C. McDiarmid