ELATED CORRESPONDENCE MORGAN, LEWIS & BOCH LOS ANGELES COUNSELORS AT LAW MIAMI 1800 M STREET, N.W. PARIS WASHINGTON, D.C. 20036 TEL PHONE: (202) 872-5000 May 8, 1981

Herbert Grossman, Esq., Chairman Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dr. Harry Foreman Administrative Judge Box 395, Mayo University of Minnesota Minneapolis, MN 55455

Dr. George A. Ferguson Administrative Judge School of Engineering Howard University 2300 6th Street, N.W. Washington, D.C. 20059

PHILADELPHIA

HARRISBURG

NEW YORK



In the Matter of General Electric Co. (Vallecitos Nuclear Center General Electric Test Reactor) Docket No. 50-70 Operating License No. TR-1 (Show Cause)

Dear Administrative Judges:

In accordance with the schedule agreed to by the parties in the stipulation agreement, General Electric Company is hereby filing the list of exhibits which it intends to enter into evidence in this proceeding. Copies of the list have been furnished to all addresses on the service list.

Respectfully Submitted,

Attorney for General Electric

cc.: Remainder of Service List

8107020509

ASSOCIATED OFFICE

Licensee's List of Exhibits

Panel 1

Exhibit No.	Reference No. *	<u>Title</u>
1		Testimony of Richard C. Harding, Richard C. Jahns, Richard L. Meehan, John W. Reed, and Dwight L. Gilliland Concerning Issue 1 (Surface Displace- ment), Submitted on behalf of the General Electric Company (May 1, 1981).
2	14	Earth Sciences Associates, Geologic Investigation of the General Electric Test Reactor Site (February 1978).
3	16	Earth Sciences Associates, Addendum I to ESA Geologic Investigation of the General Electric Test Reactor Site (April 1978).
4	21	Earth Sciences Associates, Landslide Stability at the General Electric Test Reactor Site (July 1978).
5	27	General Electric Company, Responses to USNRC Requests for Additional Information (October 1978).
6	31(2)	Earth Sciences Associates, Geologic Investigation, Phase II, General Electric Test Reactor Site (February 1979).
7	31(3)	Richard H. Jahns, Evaluation of Seismic Hazard at the General Electric Test Reactor Site (February 1979).
8	32	Earth Sciences Associates, Errata Sheets for Geologic Investigation-Phase II Report (March 1979).
9	33	General Electric Company, Responses to Comments Raised by NRC Staff and Consultants Concerning GETR Geologic Investigations at Meeting of 3/20/79 (March 1979).

^{*} Reference Numbers are as listed in Attachment A to the Feb. 25, 1981 Licensee's Supplemental Response to Intervenor's Discovery.

Exhibit No.	Reference No.	Title
10	34	Engineering Decision Analysis Company, Probability Analysis of Surface Rupture Offset Beneath Reactor Building, General Electric Test Reactor (April 1979).
11	35	General Electric Company, Responses to Questions Raised by NRC Staff and Consultants Concerning GETR Phase II Geologic Investigation (June 1979).
12	41	General Electric Company, Response to Letter from David B. Slemmons to Robert E. Jackson Dated August 8, 1979 (September 1979).
13	43	Roy J. Shlemon and Associates, Review of Commentary Regarding Late Quaternary Strategraphy at the GETR Site by Dr. David B. Slemmons (September 1979).
14	46	Jack R. Benjamin and Associates, Additional Probability Analyses of Surface Rupture Offset Beneath Reactor Building-General Electric Test Reactor (March 1980).
15	52	General Electric Company, Letter to Darrell G. Eisenhut (NRC) from R.W. Darmitzel regarding "Analysis of the General Electric Test Reactor (GETR) Foundation Excavation Photographs" (April 1980).
16	54	General Electric Company, Responses to NRC Questions on Additional Probability Analyses of Surface Rupture Offset Beneath Reactor Building-General Electric Test Reactor (April 1980).
17	63	General Electric Company, Letter to Darrell G. Eisenhut (NRC) from R.W. Darmitzel concerning "Soil Shear Modulus and Bearing Capacity Values for the Soil Beneath the General Electric Test Reactor (GETR) with attached letter to Dwight Gilliland from Garrison Kost (EDAC) regarding GETR Soil Properties, EDAC Project 117-258 and attached letter to Gary Kost from Richard L. Meehan (ESA) regarding Subgrade Soil Values (August 1980).

Exhibit No.	Reference No.	<u>Title</u>
18	66	Earth Sciences Associates, GETR Landslide Stability Analysis (August 1980).
19	71	General Electric Company, Letter to Robert A. Clark (NRC) from R.W. Darmitzel with attachments - (1) Attachment to Response to Additional Information Request Regarding Bearing Capacity Values for Soil Beneath the GETR and (2) Review of GETR Soil Property Effects (October 1980).
20	72	R. Meehan and M. Traubenik, Earth Sciences Associates, Analysis of the Subgrade Rupture Mechanism at the General Electric Test Reactor (December 1980).
		Panel 2
21		Testimony of Robert L. Kovach, Charles F. Richter, Garrison Kost, and Dwight L. Gilliland Concerning Issue 1 (Seismic Design), Submitted on Behalf of the General Electric Company (May 1, 1981).
		Panel 3
22		Testimony of Garrison Kost, Harold Durlofsky and Dwight L. Gilliland Concerning Issue 2, Submitted on Behalf of the General Electric Company (May 1, 1981).
23	11	Engineering Decision Analysis Company, Seismic Analysis of Reactor Building General Electric Test Reactor, Phase I (EDAC 117-217.02 February 3, 1978).

Exhibit No.	Reference No.	<u>Title</u>
24	13	General Electric Company, Update of Analytical and Modification Information (February 1978).
25	19	Engineering Decision Analysis Company, Seismic Analysis of Reactor Building - Phase II (EDAC 117-217.03 June 1, 1978).
26	22(3)	Engineering Decision Analysis Company, Seismic Analysis of Primary Cooling System and Reactor Pressure Vessel, General Electric Test Reactor (EDAC 117-217.05, June 30, 1978).
27	22(4)	Engineering Decision Analysis Company, Seismic Analysis of Primary Heat Ex- changer, General Electric Test Reactor (EDAC 117-217.06, June 23, 1978).
28	22(5)	Engineering Decision Analysis Company, Analysis of Lateral Restraints to Contain Heat Exchanger HE 102, prepared for General Electric Company (GETR) (EDAC 117-217.10, June 30, 1978).
29	22(6)	Engineering Decision Analysis Company, Seismic Analysis of Reactor Pressure Vessel and Pool Drain Lines and Poison Injection Line, General Electric Test Reactor (EDAC 117-217.07, June 9, 1978).
30	22(7)	Engineering Decision Analysis Company, Seismic Analysis of Fuel Flooding System, General Electric Test Reactor. (EDAC 117-217.08, June 30, 1978).
31	22(8)	Engineering Decision Analysis Company, Qualification of Safety-Related Valves, General Electric Test Reactor, General Electric Test Reactor (EDAC 117-217.09, June 30, 1978).
32	22(9)	Structural Mechanics Analysis, Structural Analysis of New Fuel Storage Tanks and Support System, General Electric Test Reactor (June 1978).

Exhibit No.	Reference No.	<u>Title</u>
33	22(10)	Structural Mechanics Analysis, Structural Analysis of Third Floor Missile Impact System, General Electric Test Reactor (June 1978).
34	56(2)	Engineering Decision Analysis Company, Additional Investigations to Determine the Effects of Combined Vibratory Motions and Surface Rupture Offset Due to an Earthquake on the Postulated Verona Fault (EDAC 117-253.01, Rev. 1, May 8, 1980).
35	56(4)	Engineering Decision Analysis Company, Conservatisms in the Seismic Evaluations of the GETR Reactor Building (EDAC 117-254.02, April 30, 1980).
36	60(1)	Engineering Decision Analysis Company, Summary Report - Structural Seismic Investigations of GETR (EDAC 117-258.02, July 8, 1980).
37	60(2)	Engineering Decision Analysis Company, Additional Investigations to Determine Effects of Vibratory Motions Due to an Earthquake on the Calaveras Fault EDAC 117-253.02, Rev. 1, June 30, 1980).
38	60(3)	Engineering Decision Analysis Company, Expanded Description of Soil Pressure Analyses (EDAC 117-253.01, Rev. 1, Suppl. 1, June 27, 1980).
39	60(4)	Engineering Decision Analysis Company, Evaluations for 0.6g Ground Acceleration Case, Revision 1, Supplement 2 (June 1980).
40	60(5)	Engineering Decision Analysis Company, Review of Seismic Adequacy of Piping and Equipment - GETR (EDAC 117-258.01, June 30, 1980).
41	61(3)	Engineering Decision Analysis Company, Errata Sheet for EDAC Report 117-253.01, Revision 1, Supplement 2 (July 1980).

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of)
GENERAL ELECTRIC COMPANY) Docket No. 50-70
(Vallecitos Nuclear Center - General Electric Test Reactor)) Operating License) No. TR-1) (Show Cause)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served as of this date by personal delivery or first class mail, postage prepaid, to the following:

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George Edgar Attorney for

General Electric Company

Dated: May 8, 1981