

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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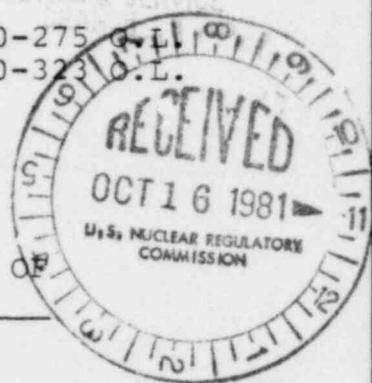
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'81 OCT 15 P1:39

In the Matter of)
)
)
PACIFIC GAS AND ELECTRIC COMPANY)
)
(Diablo Canyon Nuclear Power)
Plant, Units 1 and 2))
)

Docket Nos. 50-275
50-323

OFFICE OF SECRETARY
DOCKETING & SERVICE



GOVERNOR EDMUND G. BROWN JR. SECOND SET OF
INTERROGATORIES AND THIRD REQUEST FOR PRODUCTION
DOCUMENTS TO PACIFIC GAS AND ELECTRIC COMPANY

Pursuant to 10 C.F.R. §§ 2.740(b)-2.741, Governor Brown propounds the following Interrogatories and Document Production Requests to Pacific Gas and Electric Company ("PG&E").

INSTRUCTIONS

1. As used herein, "documents" include, but are not limited to, emergency plans and procedures, construction plans and specifications, papers, photographs, motion pictures, criteria, standards of review, recordings, memoranda, books, records, writings, letters, telegrams, mailgrams, correspondence, notes and minutes of meetings or of conversations or of phone calls, interoffice, intra-corporate memoranda or written communications of any nature, intra-agency memoranda or written communications of any nature, recordings of conversations either in writing or upon any mechanical or electronic or electrical recording devices, notes, exhibits, appraisals, work papers, reports, studies, opinions, analyses, assessments, surveys, evaluations, projections, hypotheses, formulas, designs, drawings, manuals, notebooks, worksheets, contracts, agreements, letter agree-

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ments, diaries, desk calendars, charts, schedules, appointment books, punchcards and computer printout sheets, computer data, telecopier transmissions, directives, proposals, and all drafts, revisions, and differing versions (whether formal or informal) of any of the foregoing, and also all copies of any of the foregoing which differ in any substantive way (including handwritten notations or other written or printed matter of any substantive nature) from the original.

2. These Interrogatories and Document Production Requests are intended as continuing Interrogatories and Production Requests, requiring PG&E to answer by supplemental answer, setting forth any information within the scope of these discovery requests as may be acquired by PG&E, its agents, attorneys or representatives following PG&E's original answers up to the time of hearing.

3. When asked to identify or describe a document, set forth the author(s), date of preparation, title, the subject matter of the document, to whom such document was sent, and the whereabouts of all copies.

4. When an Interrogatory or Production Request seeks a document or information of or in the possession of PG&E, that Interrogatory or Request includes all documents or information in the possession, custody or control of PG&E, including any of its contractors, employees, consultants or agents.

5. The "PG&E Response" when used herein refers to PG&E's September 15, 1981 Answers to Governor Brown's First Set of Interrogatories.

6. The "PG&E J.I. Response" when used herein refers to PG&E's September 2, 1981 Answers to Joint Intervenors' First Set of Interrogatories.

INTERROGATORY 1:

At page 36 of the PG&E Response, PG&E states that it has an agreement with Rogers Helicopter Service to provide a helicopter in the event of an emergency situation.

- A. What is the basis for the PG&E statement that "this helicopter will be used to notify persons in the Park if the County requested such assistance"? Describe all tests, analyses, or other documents which relate in any way to use of helicopters for this notification purpose.
- B. Produce all documents constituting or relating to the Rogers Agreement.

INTERROGATORY 2:

At page 40 of the PG&E Response, PG&E states that the onsite meteorological tower is capable of withstanding winds of 110 miles per hour within normal working stresses and that such winds constitute the equivalent of a seismic loading of 1.2g. Provide all analyses, calculations, and other documents which support or in any way relate to the PG&E conclusion that winds of 110 miles per hour constitute the equivalent of a seismic loading of 1.2g and/or that the tower will, in fact, remain operable in such a situation.

INTERROGATORY 3:

At page 75 of the PG&E Response, PG&E states its intention to construct a permanent EOF.

- A. When does PG&E intend to complete construction of a permanent EOF?
- B. What is the current status of meeting the foregoing construction completion objective?
- C. Describe all documents related to construction of this permanent EOF.
- D. Will the permanent EOF be seismically qualified to remain functional in all respects in the event of an earthquake up to and including the SSE on the Hosgri fault and a 7.0-7.5 magnitude earthquake on the Rhinconada fault?

INTERROGATORY 4:

At page 81 of the PG&E Response, PG&E states that in the event of OBE and SSE accelerations at the Diablo Canyon site, UDAC and its related equipment will remain functional.

- A. What accelerations does PG&E assume would occur in the OBE and SSE at the UDAC site? (If the accelerations are those set forth in Table I, p. 84, so state.)
- B. What analyses support PG&E's statement that UDAC and its associated equipment will remain functional under such accelerations?
- C. Has PG&E performed any analyses to determine whether UDAC and its related equipment will still remain

functional in the event of a magnitude 7.0-7.5 earthquake on the Rinconada fault located at its closest point to UDAC? If so, please describe such analyses and produce them. If not, please describe the reason why such analyses have not been performed.

INTERROGATORY 5:

At pages 84-89 of the PG&E Response, PG&E presents in tables its predicted accelerations at various onsite and offsite locations in the event of the SSE and the OBE. In these tables, PG&E uses the term "Distance from Hosgri fault." Define that term.

INTERROGATORY 6:

- A. With reference to the tables beginning at page 84 of the PG&E Response, what was the rationale for using accelerations less than those postulated for the SSE in the Diablo Canyon seismic proceeding? For example, the onsite meteorological towers are located at the Diablo Canyon facility. During the seismic proceeding, a free field acceleration for the SSE was postulated at 0.75g for that location. Why was a lesser acceleration, namely 0.48g, postulated in Table 1 and also in the Tera Report?
- B. At page 66 of the PG&E Response, the following statement is made:

The postulated magnitude 7.5 earthquake on the Hosgri fault was chosen because of its use as the seismic design basis for the Diablo Canyon Power Plant and its dominant seismic hazard to the plant.

Explain why an acceleration of 0.75g was not also assumed at the plant site for this magnitude 7.5 earthquake since: (i) this was the free field acceleration used in the seismic design basis for the Diablo Canyon plant; and (ii) a 0.75g SSE acceleration is specifically set forth in the Diablo Canyon Emergency Plan (Table 4.1-1, p. 15).

INTERROGATORY 7:

With reference to the tables beginning at page 84 of the PG&E Response, are the peak accelerations listed mean peak accelerations or medians and what is the assumed standard deviation?

INTERROGATORY 8:

At page 5 of the PG&E Response, lines 14-16, PG&E states that "the dose reduction benefit of sheltering versus evacuation and being overtaken by the passing plume will be evaluated on a case-by-case basis." What criteria will be utilized in this case-by-case determination? What training is being and/or has been provided to PG&E personnel on application of these criteria?

INTERROGATORY 9:

At page 7 of the PG&E Response, reference is made to the media center at Cuesta College. What is the seismic qualification of that media center?

INTERROGATORY 10:

At pages 15-19 of the PG&E Response, PG&E has described many elements of its public information program. Has this information

been produced in response to Governor Brown's prior document production requests? If not, the Governor requests that all documents described at pages 15-19 and drafts of documents not in complete form be produced.

INTERROGATORY 11:

At page 27 of the PG&E Response, seven documents are described related to emergency planning drills. Have these documents been produced in response to Governor Brown's document production requests? If not, produce these documents.

INTERROGATORY 12:

At page 32 of the PG&E Response, PG&E describes various documents. Documents Nos. 13 and 14, to our knowledge, have not yet been produced by PG&E in response to the Governor's document production requests. Produce these documents.

INTERROGATORY 13:

In Interrogatory 9 of Governor Brown's first set of Interrogatories to PG&E, the Governor asked PG&E, inter alia, to identify and describe any tests or analyses which have been performed either by PG&E or others on the qualifications, characteristics, and response features of the real-time monitors and the equipment at the environmental monitoring stations. PG&E omitted any response to this Interrogatory in its earlier answers. Please provide a response at this time.

INTERROGATORY 14:

At page 40 of the PG&E Response, PG&E referenced that the Federal Signal Company has recently completed some seismic work on the largest siren. PG&E also stated that this information was

being forwarded to PG&E and will be used to supplement PG&E's earlier response when available. Has this information yet been provided to PG&E? When does PG&E anticipate supplementing its earlier responses?

INTERROGATORY 15:

At page 42, lines 19-21, of the PG&E Response, reference is made to the compressor and the compressor platform related to the siren system. Have any seismic analyses been performed regarding the compressor and/or the associated platform? If so, describe and provide these analyses.

INTERROGATORY 16:

At page 56 of the PG&E Response, it is stated that the standard operating procedures for the San Luis Obispo County Emergency Plan would be described in PG&E's responses to requests for production. Our review of PG&E's production responses discloses that these procedures were not so described. Accordingly, describe each of those operating procedures or, in the alternative, produce them for inspection and copying.

INTERROGATORY 17:

At page 66 of the PG&E Response, the following statement is made:

A large variability of off-site damage would be expected to result from the Hosgri earthquake. This diversity of damage comprehensively challenges emergency plans and requires them to be extremely flexible. The variety of damage scenarios considered largely envelopes

the expected effects of both smaller and larger earthquakes that might occur within San Luis Obispo County. The main difference being the relative likelihood of specific scenarios.

- A. In what way do the damage scenarios considered not envelope the expected effects of both large and smaller earthquakes that might occur within San Luis Obispo County?
- B. Describe all analyses or other documents which support the statement quoted above.

INTERROGATORY 18:

On page 72 of the PG&E Response, PG&E states that it believes all applicable emergency plans will be in compliance with all applicable regulations prior to commercial operation of the Diablo Canyon facility.

- A. As of September 15, 1981, the date of the PG&E Response, (or, if PG&E prefers, on the date PG&E responds to these Interrogatories) what were (are) the items of non-compliance with applicable regulations for the PG&E, the County, and the State emergency response plans?
- B. What schedule for resolution of these items of non-compliance did PG&E assume when it made the foregoing statement on page 72?

INTERROGATORY 19:

Describe all human factors or other analyses which have been performed or are to be performed on PG&E's implementing procedures for the PG&E Emergency Response Plan, Revision 3.

INTERROGATORY 20:

At page 76 of the PG&E Response, PG&E objected as irrelevant and outside of the scope of discovery to Governor Brown's request that PG&E describe human factors or other analyses which have been performed on PG&E's emergency operating procedures. Emergency operating procedures are relevant, however, since the Emergency Plan (e.g., pp. 6-8, et. seq.) specifically addresses assessment activities covered by such procedures. Further, in Joint Intervenor's Statement of Clarified Contentions dated June 20, 1981, emergency operating procedures were specifically included. The Board restated Joint Intervenor's contention, but it expressed no disagreement that emergency operating procedures were part of that contention. Accordingly, Governor Brown requests PG&E to respond to the Governor's original Interrogatory No. 30 which requests as follows:

Describe all human factors or other analyses which have been performed on or are proposed to be performed on PG&E's Emergency Operating Procedures. When and by whom was each analysis performed?

INTERROGATORY 21:

At page 82 of the PG&E Response, PG&E identifies a Tera Corporation report entitled, "Evaluation of Peak Horizontal Ground Acceleration Associated with the Hosgri Fault at the Diablo Canyon Nuclear Power Plant," dated August 1980.

- A. Has this document been produced by PG&E?
- B. If not, produce this document.

INTERROGATORY 22:

At page 17 of the PG&E J.I. Response, PG&E states that the Tera Report will be evaluated and appropriate changes to the Emergency Plans and Procedures will be made as required.

- A. Has PG&E conducted analyses of the Tera Report to identify any changes in plans and procedures which will be required?
- B. If the answer to the foregoing is yes, describe all these analyses and changes and produce them.
- C. If such analyses have not been performed, when will they be performed?

INTERROGATORY 23:

At page 18 of PG&E's J.I. Response, PG&E states that it understands that the forthcoming Tera Report would be applicable to earthquakes greater than the M 7.5 SSE. Subsequent to PG&E's answers, PG&E has received the Tera Report. Does PG&E contend that this report is applicable to earthquakes greater than the SSE? If so, identify what portions, in PG&E's opinion, address earthquakes greater than the SSE.

INTERROGATORY 24:

At pages 41 and 42 of PG&E's J.I. Response, PG&E identifies four land routes, in addition to the north and south land routes, which might be utilized by vehicles or foot traffic to leave Diablo Canyon. The second route (lines 18-22 on page 41) is identified as perhaps not being available to ordinary vehicles. Are routes 1, 3 and 4 available to ordinary vehicles? If the answer is affirmative, describe any analyses performed by or for PG&E to

document that ordinary vehicles can use these other three routes.

INTERROGATORY 25:

In document EPNG0005395, produced by PG&E in response to Governor Brown's document production requests, PG&E states that all "critical equipment" is securely braced and anchored to prevent sliding, overturning, or striking other equipment or the building. How does PG&E define critical equipment? Does such critical equipment include the onsite and offsite real-time monitors, environmental monitoring equipment, and public notification system sirens?

INTERROGATORY 26:

At pages EPNG0010795-96 of the documents produced by PG&E in discovery (Tera proposal TR-81-1247), Tera states that it proposes to analyze "other earthquake effects."

- A. Has Tera performed such an analysis? If so, provide such analysis.
- B. If Tera has not yet performed such analysis, is it in the process of performing such analysis, and if so, when will it be performed? Provide such analysis when it has been performed.

INTERROGATORY 27:

In the event of a major earthquake on the Hosgri fault up to and including the SSE, does PG&E expect that there would be sufficient damage to homes and residences in San Luis Obispo County (or any part of it) such that sheltering, at least in areas of greatest earthquake damage, no longer will be a viable protective action alternative?

- A. Describe the bases for your response.
- B. Identify any documents which relate in any way to this matter.

INTERROGATORY 28:

At page 8 of Tera Corporation's April 8, 1981 "Proposal for Earthquake Emergency Planning" (page EPNG0017126 of documents produced by PG&E), personnel from Tera Corporation who propose to work on the Tera Corporation's study are identified.

- A. Are these the persons from Tera Corporation who did, in fact, work on and prepare the Tera Corporation report submitted in September 1981?
- B. Describe for each individual what his or her role was in preparation of said report.
- C. Identify, with reference to specific sections of the Tera Report and its appendices, the persons primarily responsible for the analyses, calculations, and technical portions of that report.

INTERROGATORY 29:

In the document production responses of PG&E, a number of documents constituting minutes of the PG&E Emergency Planning Task Force were provided. Have all minutes up to the current time been provided? If not, which minutes have not been provided? Provide all those not previously provided. In that regard, at page EPNP0047862 (minutes of February 4, 1981 Emergency Planning Task Force Meeting) there is a statement that the Task Force will meet bi-weekly until the field exercises are concluded. We do not have bi-weekly minutes up through August 19, 1981.

INTERROGATORY 30:

Three Tera Corporation references (pp. 7-1 and 7-2) are not publicly available. These are:

Applied Technology Council, 1981, "Guidelines for the Evaluation of Highway Bridges, ATC-b, Final Draft Report," Applied Technology Council, Berkeley, California.

Campbell, K. W., 1980, "Attenuation of Peak Horizontal Acceleration within the Near-Source Region of Moderate to Large Earthquakes," TERA Corporation, Technical Report 80-1, Berkeley, California.

Campbell, K. W., 1981, "Near-Source Attenuation of Peak Horizontal Acceleration," Bulletin of the Seismological Society of America, Vol. 71 (in press).

Produce these documents.

INTERROGATORY 31:

At page 6-8 of the PG&E Emergency Plan, the following statement appears:

In the case of the LOCA with inadequate core cooling, the major release would not be expected for at least two hours and probably much longer, due to the time required to melt a large fraction of the core and the expected time before any containment failure would be likely.

- A. What analyses have been performed to support the foregoing statement?
- B. Describe all documents which relate in any way to the foregoing statement.

INTERROGATORY 32:

At page 6-17 of the PG&E Emergency Plan, it is stated that "the real-time monitors would be automatically interrogated throughout the course of the accident and any environmental assessment."

- A. Does the capability exist at this time to automatically interrogate from the plant all onsite and offsite real-time monitors?
- B. If the answer is affirmative, when was this capability established and please describe its technical basis.
- C. If not, does PG&E intend to establish such automatic interrogation capability and if so, when?

INTERROGATORY 33:

In the event the ECF and UDAC are not functional, what communication and assessment capabilities are available at the County's EOC?

INTERROGATORY 34:

At page 7-25 of the PG&E Emergency Plan, PG&E states that the County Emergency Plan will provide for special notification arrangements in the wilderness area near the plant, particularly the State Park.

- A. What are these special notification arrangements?
- B. Have these arrangements ever been practiced? If so, describe the practice sessions.

INTERROGATORY 35:

At page 7-25 of the PG&E Emergency Plan, PG&E explains that the early warning notification sirens are activated by a microwave signal from the Sheriff's office to three transmitter stations at Cuesta Peak, Rocky Butte, and Davis Peak.

- A. What are the seismic qualifications of the Sheriff's microwave equipment and the three transmitter stations noted above? Describe all documents which relate to the seismic qualification of this equipment.

B. In the event the Sheriff's microwave equipment fails, three backup encoders, located at County fire stations, can be used to activate the early warning notification sirens.

- (1) What procedures exist for use of these alternate activation systems?
- (2) What are the seismic qualifications of these backup encoders?
- (3) At which County fire stations are these encoders located?

INTERROGATORY 36:

At page 7-35 of the PG&E Emergency Plan, PG&E states that "the central computer sub-system is the heart of the emergency dose assessment and response system."

- A. Has the central computer system referred to above been classified as safety-grade equipment?
- B. If the answer is no, explain the rationale for this decision.
- C. If the answer is yes, describe all analyses which document that the computer meets safety-grade requirements.

INTERROGATORY 37:

Describe the power source configuration for the Diablo Canyon pressurizer heaters. What other power source configurations were evaluated by PG&E to supply power to the pressurizer heaters? What is PG&E's rationale for its choice of configuration? If the heaters were classified as safety-grade, what configuration would be utilized?

INTERROGATORY 38:

What is the reliability of the power sources for the Diablo Canyon pressurizer heaters? Describe all documents which relate in any way to the reliability of these power sources.

INTERROGATORY 39:

What is the worst case loading on the busses supplying power to the pressurizer heaters at Diablo Canyon? Include in your answer a description of the types of loads, whether they are starting or transient loads, and the times they are likely to occur.

INTERROGATORY 40:

For what seismic and environmental conditions have the Diablo Canyon pressurizer heaters and related structures, instruments, controls and power sources been qualified? Include in your answer a description of all analyses and other documents which relate in any way to qualification of these heaters.

INTERROGATORY 41:

What accident or off-normal conditions at Diablo Canyon would require the pressurizer heaters to operate?

INTERROGATORY 42:

Are the pressurizer heaters anticipated to be utilized at Diablo Canyon when natural circulation needs to be established? If so, which emergency operating procedure(s) would be involved? What action or actions would be planned in the event that natural circulation needs to be achieved at Diablo Canyon and the pressurizer heaters and/or the power sources thereto are not operative?

INTERROGATORY 43:

What rationale is utilized by PG&E to justify classification of the pressurizer heaters and related instruments, controls,

structures and power sources as non-safety grade? Provide all documents, analyses, or other materials which relate in any way to this rationale.

INTERROGATORY 44:

What is the status of the EPRI tests on block and power operated relief valves of the kinds utilized at Diablo Canyon?

INTERROGATORY 45:

Have the structures, instruments, control systems, and power sources supporting and/or relating to the block and relief valves at Diablo Canyon been analyzed and qualified for all potential operating and accident conditions?

A. If so, describe these analyses and all other documents relating thereto.

B. If not, why have these analyses not been carried out?

INTERROGATORY 46:

Does the EPRI test program for relief and block valves cover structures, instruments, control systems, and power sources of the type(s) utilized at Diablo Canyon? Provide the bases for your response.

INTERROGATORY 47:

Has PG&E seismically and environmentally qualified the instrumentation, controls, structures and power sources for its block and relief valves?

INTERROGATORY 48:

The power operated relief valves and block valves at Diablo Canyon are not classified as safety grade. What is the rationale for failing to classify these items as safety grade and what analyses, if any, have been conducted to support such classification as non-safety grade? Describe all such analyses and all other documents relating to the question of the classification of block and relief valves.

INTERROGATORY 49:

Does PG&E intend to rely on block and/or relief valves during an emergency situation such as a loss-of-coolant accident? Provide the bases for your response, including identification of all emergency operating procedures related thereto.

DOCUMENT PRODUCTION REQUESTS

1. Produce all documents requested, described, and/or referred to in the foregoing Interrogatories or responses thereto.
2. All status reports (monthly, or otherwise) regarding the Tera earthquake analyses and all correspondence between PG&E and Tera concerning such analyses.

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October 14, 1981

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

81 OCT 15 P1:39

OFFICE OF SECRETARY
CLERKING & SERVICE
BRANCH

In the Matter of)

PACIFIC GAS AND ELECTRIC COMPANY)

(Diablo Canyon Nuclear Power Plant,)
Units 1 and 2))

) Docket Nos. 50-275 O.L.
) 50-323 O.L.

CERTIFICATE OF SERVICE

I hereby certify that copies of "GOVERNOR EDMUND G. BROWN JR. SECOND SET OF INTERROGATORIES AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF" and "GOVERNOR EDMUND G. BROWN JR. SECOND SET OF INTERROGATORIES AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO PACIFIC GAS AND ELECTRIC COMPANY" in the above-captioned proceeding have been served to the following on October 14, 1981 by U.S. mail, first class.

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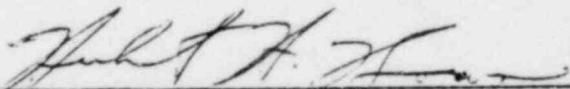
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