Verification

I have assisted in preparing the Joint Intervenors' sesponses to Pacific Gas and Electric Company's First Set of Interrogatories, filed in the reopened proceeding regarding design quality assurance. Said responses are true and correct to the best of my knowledge.

Mandy Culver

San Luis Obispo Mothers for Peace

Subscribed and sworn to before me this $\frac{29^{13}}{1983}$ day of June, 1983

Notary Public

JOHN M. CARSEL

NOTARY PUBLIC — CALIFORNIA

PRINCIPAL OFFICE IN

SAN LUIS OBISPO COUNTY

My Commission Expires Sept. 29, 1983

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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.

(Reopened Hearing --Design Quality Assurance)

JOINT INTERVENORS' RESPONSE TO PACIFIC GAS AND ELECTRIC COMPANY'S FIRST SET OF INTERROGATORIES

Joint Intervenors hereby respond to Pacific Gas and Electric Company's ("Applicant") June 10, 1983 First Set of Interrogatories to Joint Intervenors, as follows:

Response to Interrogatory No. 1:

Joint Intervenors object to this interrogatory on the grounds that it is overly broad, burdensome and oppressive, and not reasonably calculated to lead to the discovery of relevant or admissible evidence, and it calls for privileged information (e.g., attorney work product; informant). In addition, the information requested is fully available to the Applicant at any time since the subject employees are employed by the Applicant or its contractors. Thus, the requested information can be obtained simply by asking the employees themselves.

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of

PACIFIC GAS AND ELECTRIC COMPANY) Docket Nos. 50-275 O.L.

(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 on this 30th day of June, 1983, I have served copies of the foregoing NOTICE OF CORRECTION, mailing them through the U.S. mails, first class, postage prepaid.

Thomas S. Moore, Chairman Atomic Safety & Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dr. W. Reed Johnson
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. John H. Buck
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Fredrick Eissler
Scenic Shoreline Preservation
Conference, Inc.
4623 More Mesa Drive
Santa Barbara, CA 93105

Malcolm H. Furbush, Esq.
Vice President & General
Counsel
Philip A. Crane, Esq.
Pacific Gas & Electric Company
Post Office Box 7442
San Francisco, CA 94106

Docket & Service Branch
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Lawrence Chandler, Esq.
Office of the Executive Legal
Director - BETH 042
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Herbert Brown, Esq.
Lawrence Coe Lanpher, Esq.
Alan Dynner, Esq.
Kirkpatrick, Lockhart,
Hill, Christopher, et al.
1900 M Street, N.W.
Washington, D.C. 20036

Jance E. Kerr, Esq.
Lawrence Q. Garcia, Esq.
J. Calvin Simpson, Esq.
California public Utilities
Commission
5246 McAllister Street
San Francisco, CA 94102

John Van de Kamp, Attorney
General
Andrea Sheridan Ordin, Chief
Attorney General
Michael J. Strumwasser, Special
Counsel to the Attorney General
State of California
3580 Wilshire Boulevard
Suite 800
Los Angeles, CA 90010

David S. Fleischaker Post Office Box 1178 Oklahoma City, OK 73101

MHB Technical Associates 1723 Hamilton Avenue Suite K San Jose, CA 95725

Arthur C. Gehr, Esq. Snell & Wilmer 3100 Valley Center Phoenix, AZ 85073

Virginia and Gordon Bruno Pecho Ranch Post Office Box 6289 Los Osos, CA 93402

Sandra and Gordon Silver 1760 Alisal Street San Luis Obispo, CA 93401

Nancy Culver 192 Luneta San Luis Obispo, CA 93401

Carl Neiburger
Telegram Tribune
Post Office Box 112
San Luis Obispo, CA 93402

Bruce Norton, Esq.
Norton, Burke, Berry
& French, P.C.
2002 E. Osborn
Phoenix, AZ 85016

Amanda Varona