

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

83 OCT 11 AM 11:21

ATOMIC SAFETY AND LICENSING APPEAL BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Docket No. 50-275
Docket No. 50-323

GOVERNOR DEUKMEJIAN'S FIRST SUPPLEMENTAL
ANSWERS TO APPLICANT PG&E'S FOURTH SET
OF INTERROGATORIES

Governor George Deukmejian hereby provides this
First Supplement to his answers to applicant PG&E's Fourth
Set of Interrogatories. Only those interrogatories whose
answers are being supplemented are reproduced here.

INTERROGATORY NO. 17:

. . . .

(c) Identify each document relied upon to form
the basis of the opinion with specific reference to the
section and page of the document.

ANSWER TO INTERROGATORY NO. 17:

(c) Also relied upon are the depositions of
Drs. Reich, Philippacopoulos and Kuo and of Mr. Polk.

INTERROGATORY NO. 21:

Identify each and every document that Dr. Roesett
[sic] has as of September 26, 1983, reviewed or utilized

in preparation of his written testimony to be filed
October 8, 1983.

ANSWER TO INTERROGATORY NO. 21:

Inadvertently omitted from the original answer to
this interrogatory, but mentioned at Dr. Roesett's
deposition, were the SER Supplements 16 and 18.

INTERROGATORY NO. 22:

Identify each and every document that Dr. Roesett
[sic] has reviewed or utilized in preparation for his
deposition.

ANSWER TO INTERROGATORY NO. 22:

See Answer to Interrogatory No. 21, above.

INTERROGATORY NO. 23:

. . . .

(e) For each answer to 23(b), (c), and (d),
specify the full factual basis for your answer, and
identify each document by page and line on which you rely
for each such answer.

ANSWER TO INTERROGATORY NO. 23:

(e) Also relied upon are the depositions of Drs.
Reich, Philippacopoulos and Kuo, and of Mr. Polk.

INTERROGATORY NO. 75:

For each answer to these interrogatories and all
subparts thereto, identify each person who participated in
the preparation of your answers pursuant to 10 C.F.R.
section 2.740(b).

ANSWER TO INTERROGATORY NO. 75:

All answers prepared by Susan L. Durbin, Deputy
Attorney General.

DATED: OCTOBER 2, 1983

Respectfully submitted,

JOHN K. VAN DE KAMP, Attorney General
of the State of California
ANDREA SHERIDAN ORDIN, Chief
Assistant Attorney General
MICHAEL J. STRUMWASSER, Special
Counsel to the Attorney General
SUSAN L. DURBIN,
PETER H. KAUFMAN,
Deputy Attorneys General

By

Susan L. Durbin
SUSAN L. DURBIN

Attorneys for Governor
George Deukmejian

3580 Wilshire Boulevard, Suite 800
Los Angeles, California 90010
Telephone: (213) 737-2105

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.

CERTIFICATION

I, Susan L. Durbin, hereby certify:

1. I am one of the attorneys for Governor George Deukmejian in the above-entitled matter and, as such, am authorized to execute this certification.

2. I have read the foregoing Governor Deukmejian's First Supplemental Answers to Applicant PG&E's Fourth Set of Interrogatories and know the contents thereof.

3. I am informed and believe the answers to said Answers to all answers to be true and correct.

I certify under penalty of perjury that the foregoing is true and correct.

Executed at Los Angeles, California, on October 7,
1983.



SUSAN L. DURBIN

UNITED STATES OF AMERICA

DOCKETED
USNRC

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD ⁸³ OCT 11 AM 11:21

In the Matter of)

PACIFIC GAS AND ELECTRIC COMPANY)

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused copies of the foregoing "(1) Governor Deukmejian's Second Supplemental Answers to Appellant PG&E's First Set of Interrogatories, (2) Governor Deukmejian's First Supplemental Answers to Applicant PG&E's Second Set of Interrogatories, and (3) Governor Deukmejian's First Supplemental Answers to Applicant PG&E's Fourth Set of Interrogatories" served on the following by U.S. Mail, first class, postage prepaid. *Names marked by an asterisk served by Expressmail.*

Hon. Nunzio Palladino, Chairman
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Hon. Victor Gilinsky, Commissioner
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Hon. Thomas Roberts, Commissioner
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Hon. James Asselstine, Commissioner
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Hon. Frederick M. Bernthal, Commissioner
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

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

Hon. Thomas S. Moore, Chairman *

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

Hon. W. Reed Johnson *

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

Hon. John H. Buck *

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

Judge John F. Wolf, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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

Harold Denton
Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Leonard Bickwit, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Lawrence Chandler, Esq. *
Henry J. McGurren, Esq.
Office of Executive Legal Director
BETH 042
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing and Service Section

Mrs. Elizabeth Apfelberg
1415 Cozadero
San Luis Obispo, CA 93401

Janice E. Kerr, Esq.
Public Utilities Commission
5246 State Building
350 McAllister Street
San Francisco, CA 94102

Mrs. Raye Fleming
1920 Mattie Road
Shell Beach, CA 93449

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

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

Joel R. Reynolds, Esq.
Eric Havian, Esq.
John Phillips, Esq.
Center for Law in the Public Interest
10951 West Pico Boulevard, Third Floor
Los Angeles, CA 90064

Bruce Norton, Esq. *
Norton, Burke, Berry & French
2002 East Osborn
P.O. Box 10569
Phoenix, AZ 85064

Philip A. Crane, Jr., Esq. *
Richard F. Locke, Esq.
Pacific Gas and Electric Company
77 Beale Street, Room 3135
San Francisco, CA 94106

David S. Fleischaker, Esq.
P. O. Box 1178
Oklahoma City, OK 73101

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

Mr. Richard B. Hubbard
MHB Technical Associates
1723 Hamilton Avenue, Suite K
San Jose, CA 95125

Mr. Carl Neiberger
Telegram Tribune
P. O. Box 112
San Luis Obispo, CA 93402

Virginia and Gordon Bruno
Pecho Ranch
P.O. Box 6289
Los Osos, CA 93402

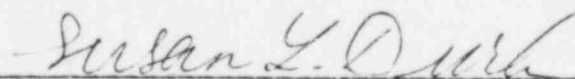
Nancy Culver
192 Luneta
San Luis Obispo, CA 93401

Maurice Axelrad, Esq. *
Lowenstein, Newman, Reis, & Axelrad
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

DATED: October 7, 1983

JOHN K. VAN DE KAMP, Attorney General
of the State of California
ANDREA SHERIDAN ORDIN, Chief
Assistant Attorney General
MICHAEL J. STRUMWASSER, Special
Counsel to the Attorney General
SUSAN L. DURBIN,
PETER H. KAUFMAN,
Deputy Attorneys General

By


SUSAN L. DURBIN

Attorneys for Governor George Deukmejian

3580 Wilshire Boulevard
Suite 800
Los Angeles, California 90010
(213) 736-2102