

RAS 3846

RELATED CORRESPONDENCE

**DOCKETED
USNRC**

January 7, 2002
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**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

**OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	
)	
Dominion Nuclear Connecticut, Inc.)	Docket No. 50-423-LA-3
)	
(Millstone Nuclear Power Station,)	ASLBP No. 00-771-01-LA-R
Unit No. 3))	

NOTICE OF DOMINION NUCLEAR CONNECTICUT, INC.'S
SECOND PRODUCTION OF DOCUMENTS TO INTERVENORS

I. Introduction

In accordance with the directives of the Atomic Safety and Licensing Board ("Licensing Board") in its November 5, 2001, Memorandum and Order (Telephone Conference Call, 10/31/01; Schedules for Proceeding), and the rules and procedures of 10 C.F.R. Part 2, Dominion Nuclear Connecticut, Inc. ("DNC") hereby produces, in response to Intervenor's Second Set of Interrogatories and Request for Production in the Reopened Proceedings, the requested document as stated below.

II. General Objections

DNC's production of documents is subject to the general objections stated in DNC's Response to Intervenor's First Set of Interrogatories and Request for Production in the Reopened Proceedings, filed November 21, 2001, and in DNC's Response to Intervenor's Second Set of Interrogatories and Request for Production in the Reopened Proceedings, filed December 20, 2001.

Template = SECY-035

SECY-02

III. Requests for Production

Subject to the aforementioned objectives, DNC hereby responds as follows to

Intervenors' specific document requests:

1. Please produce the last report prepared by the licensee and filed with the NRC in 1980 inventorying the missing spent fuel rods..

Response: This document is produced as L013745 - L013749.

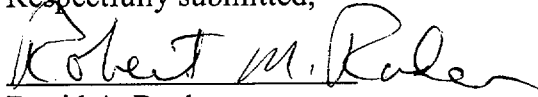
2. Please provide a complete list of low-level radioactive waste contractors and their business addresses used by Northeast Nuclear Energy Company from 1972 to the present time.

Response: As noted in DNC's Response to Intervenors' Second Set of Interrogatories and Request for Production in the Reopened Proceedings, dated December 20, 2001 ("DNC's Response to Intervenors' Second Discovery Request"), DNC objects to this discovery request on the grounds that the information sought is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.

3. Please produce all documents substantiating the responses to Interrogatory 1, a through n.

Response: As noted in DNC's Response to Intervenors' Second Discovery Request, DNC objects to this discovery request on the grounds that the information sought is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted,



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Counsel for Dominion Nuclear Connecticut, Inc.

Dated in Washington, D.C.
this 7th day of January 2002

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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)
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Notice of Dominion Nuclear Connecticut, Inc.'s Second Production of Documents to Intervenors" in the Reopened Proceedings" and documents produced pursuant thereto in the captioned proceeding have been served on the following by overnight delivery this 7th day of January 2002. Additional e-mail service of the Notice has been made this same day as shown below.

Charles Bechhoefer, Chairman
Administrative Judge
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
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Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
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Dr. Charles N. Kelber
Administrative Judge
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U.S. Nuclear Regulatory Commission
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Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Rulemakings and Adjudications Staff
(original + two copies)
(e-mail: HEARINGDOCKET@nrc.gov)

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory Commission
Washington, DC 20555


Adjudicatory File
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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*The NRC Staff has requested that it be served with only those documents produced to Intervenors that it specifically requests.


Donald P. Ferraro
Counsel for DNC, Inc.