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11/9/78

November 9, 1978

Patrick Walsh, Esq.
Department of Justice
114 East, State Capitol
Madison, Wisconsin 53702

In the Matter of
Wisconsin Public Service Corporation
Wisconsin Power and Light Company
and
Madison Gas and Electric Company
(Kewaunee Nuclear Power Plant)
Docket No. 50-305

Dear Mr. Walsh:

Enclosed please find the Staff's Interrogatories to the State of Wisconsin. Under 10 C.F.R. §2.740b and §2.710, the State's response must be served on or before November 28, 1978.

Sincerely,

Jeffrey F. Lawrence
Counsel for NRC Staff

Enclosure As Stated

cc: Robert M. Lazo, Esq.
Mr. Glenn O. Bright
Dr. Oscar H. Paris
Ms. Sandra A. Bast
Mrs. Wend Schaefer
Ms. Mary Lou Jacobi
Steven E. Keane, Esq.
Atomic Safety and Licensing Board
Atomic Safety and Licensing Appeal Board
Docketing and Service Section

OFFICE →						
SURNAME →						
DATE →						

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
WISCONSIN PUBLIC SERVICE CORPORATION)	Docket No. 50-305
WISCONSIN POWER AND LIGHT COMPANY)	Amendment to License
AND)	No. DPR-43
MADISON GAS AND ELECTRIC COMPANY)	(Increase Spent Fuel
(Kewaunee Nuclear Power Plant))	Storage Capacity)

NRC REQUEST FOR PRODUCTION OF
DOCUMENTS FROM AND INTERROGATORIES
TO THE STATE OF WISCONSIN

The Nuclear Regulatory Commission (NRC) Staff hereby requests that the State of Wisconsin, pursuant to 10 CFR §2.740, answer separately and fully, in writing under oath or affirmation, the following interrogatories within 14 days from the date of mailing of this document.

For each response to the interrogatories listed below, identify the person or persons who prepared, or substantially contributed to the preparation of the response.

If additional information becomes available with respect to one or more of the answers after the State has answered these interrogatories, the Staff requests that the answers be amended in a timely manner to provide such additional information.

The NRC Staff further requests that the State, pursuant to 10 CFR §2.741, provide copies of, or make available for Staff inspection and copying, the documents designated by the State in response to certain of the accompanying interrogatories.

1. State whether you intend to present any witnesses or testimony in this proceeding on the subject of any admitted contentions or Board questions. Please answer separately for each such question or contention.

2. Provide the names, addresses, complete educational background, all related professional experience and qualifications of those witnesses whom you intend to present with respect to contentions or questions identified in interrogatory 1.

3. Provide summaries of the views, positions, or proposed testimony which you intend to present with respect to admitted contentions or Board questions.

4. Identify by author, title, date of publication, publisher, and section or page number all books, documents, and papers that you intend to employ or rely upon in presenting your position, if any, with respect to admitted contentions or Board questions. Please provide copies of, or make available for Staff inspection and copying, these items.

5. Do you intend to take a position that any document prepared by the Applicant or NRC Staff is deficient? If so, please specify

which documents and the particular portions thereof you regard as being deficient and explain why they are deficient.

6. Identify by author, title, date of publication, publisher and section or page all books, documents, or papers that you intend to employ or rely upon in conducting your cross-examination of witnesses who may testify in connection with admitted contentions or Board questions.

7. Identify any and all experts whom you expect to conduct cross-examination or to aid in the conduct of the State's cross-examination of Staff, Licensee, or Intervenor witnesses with respect to any admitted contention or Board question. Provide the addresses, complete educational background, all related professional experience and qualifications of such experts.

Respectfully submitted,



Jeffrey F. Lawrence
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 9th day of November, 1978