

6-16-75

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

ARIZONA PUBLIC SERVICE
COMPANY, et al.

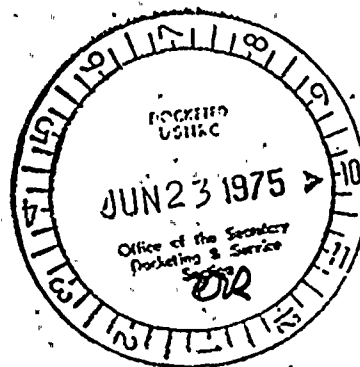
(Palo Verde Nuclear Generating
Station, Units 1, 2 and 3)

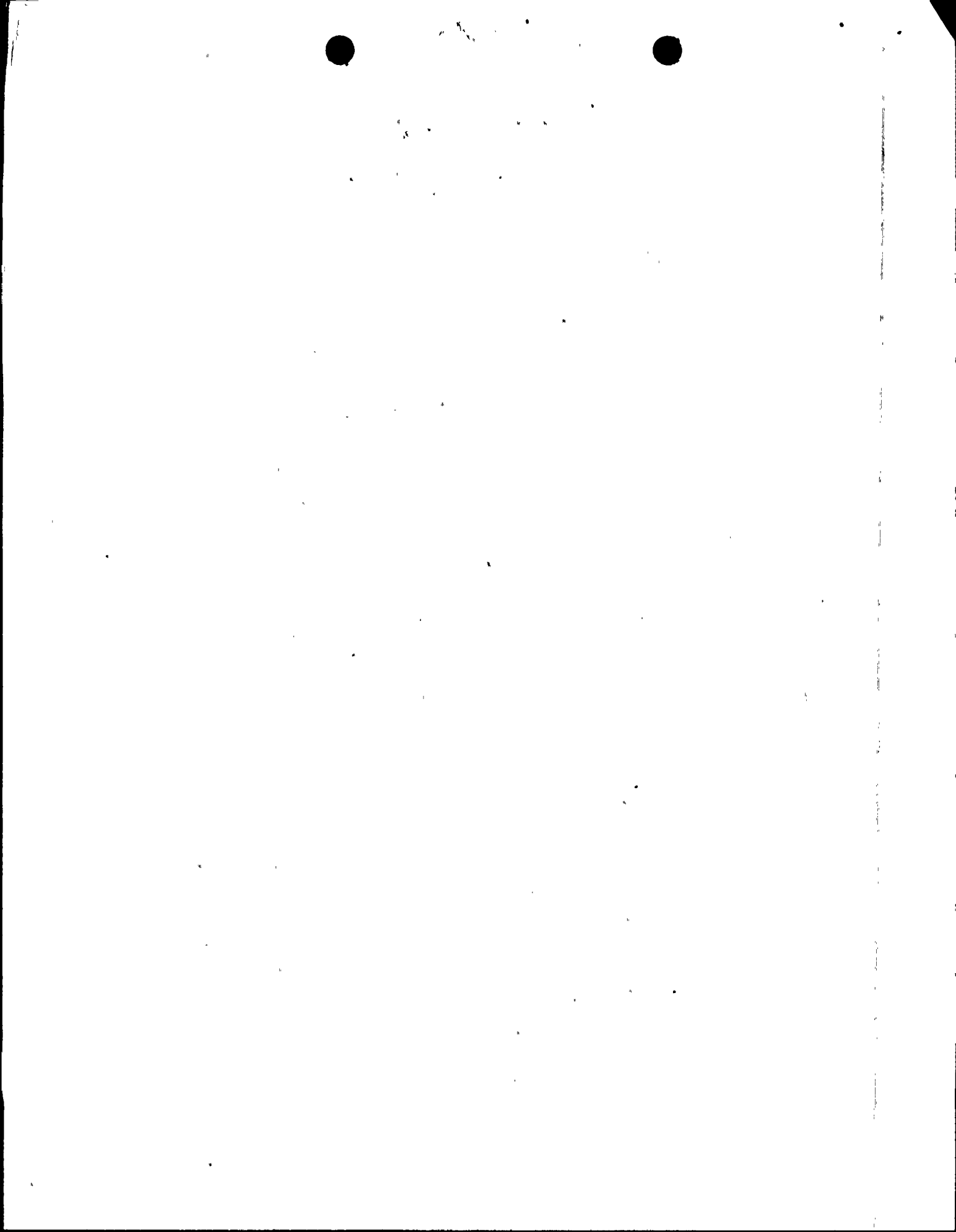
Docket Nos. STN 50-528
50-529
50-530

INTERROGATORIES

TO: Applicant, ARIZONA PUBLIC SERVICE COMPANY, and its attorneys,
SNELL & WILMER, Arthur Gehr and Bruce Norton.

Under authority of 19 CFR § 2.750, 10 CFR 2, App. A
and the Federal Rules of Civil Procedure, Intervenors ARIZONA
CLEAN ENERGY COALITION, hereby demand that Applicant Arizona
Public Service Company (hereinafter APS) or their attorney
answer in writing and under oath and within thirty (30) days
from receipt hereof, the following interrogatories:





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NOTICE OF SERVICE OF INTERROGATORIES

Intervenor hereby give notice that non-uniform in-
terrogatories nos. 1-9 have been served on Applicant APS this
16th day of June, 1975.

ARIZONA PUBLIC LAW ADVOCATES

by Barbara E. Fisher

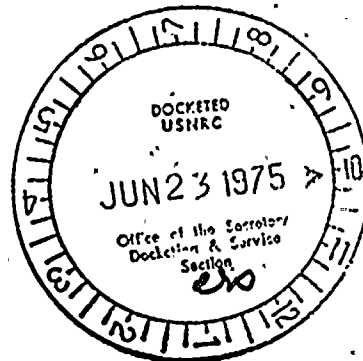
BARBARA E. FISHER
201 North Stone Avenue, Suite 210
Tucson, Arizona 85701
Attorney for Intervenor

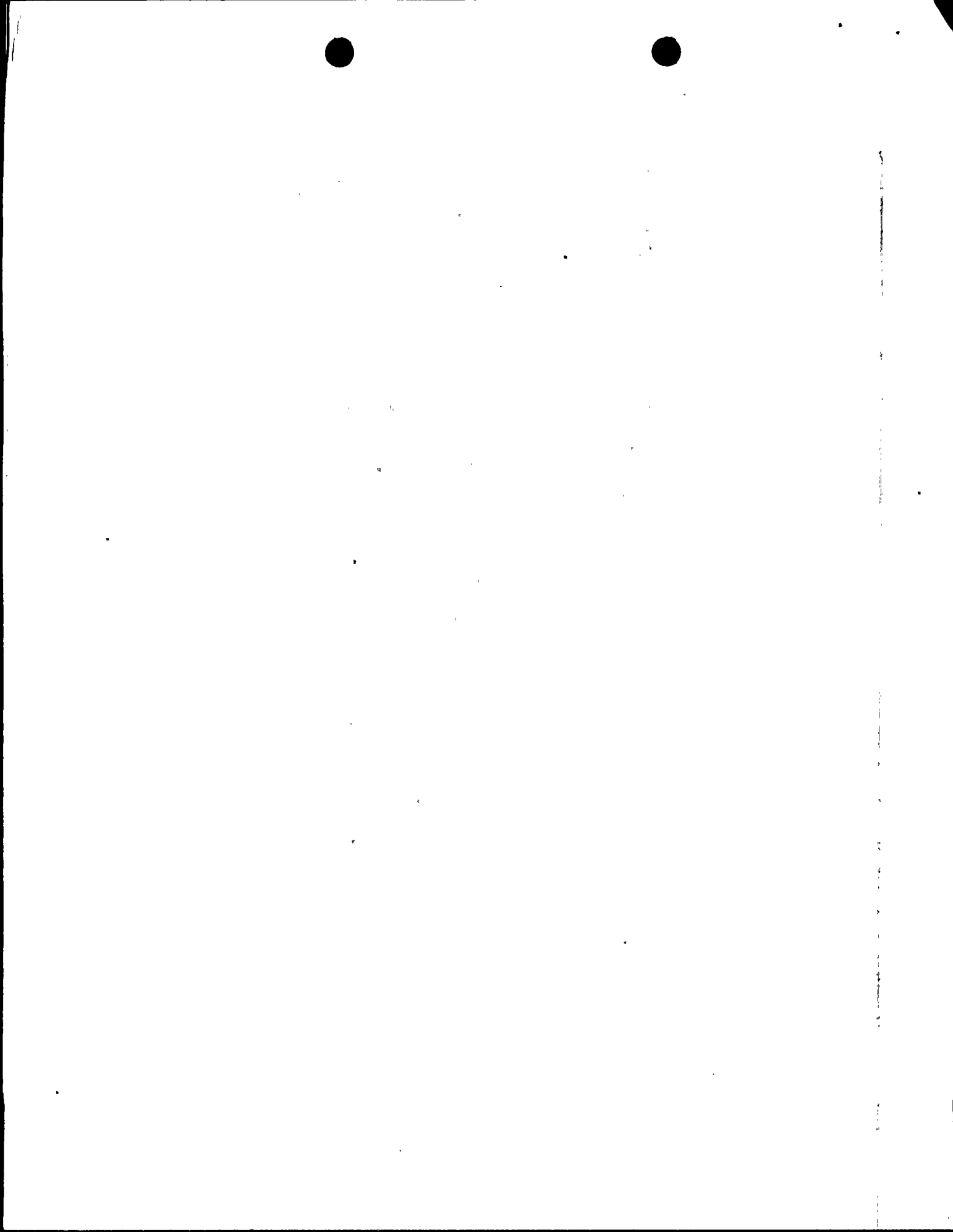
COPY OF the foregoing
mailed this 16th day of
June, 1975, to:

Frederic S. Gray
Thomas M. Bruen
U. S. Nuclear Regulatory Commission
Office of Staff Counsel
Washington, D.C. 20555

Andrew W. Bettwy
Assistant Attorney General
1700 West Washington
Phoenix, Arizona 85007

Carmine F. Cardamone, Jr.
1415 North Third Avenue
Tucson, Arizona 85705





Bruce Norton, Esq.
Arthur Gehr, Esq.
SNELL & WILMER
3100 Valley Center
Phoenix, Arizona 85073

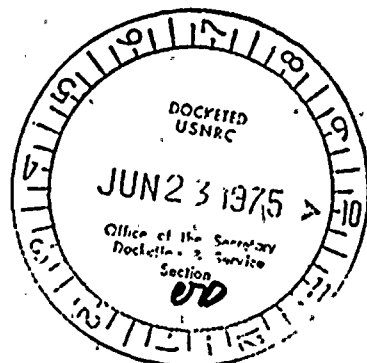
Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

1. State fully and in detail a complete description of the financing method for the construction and operation of the PVNGS.

2. State fully and in detail the projected impact on rate payers of the ANPP for each of the participants in the project assuming output capacity percentages of 30, 40, 50, 60 and 70.

3. State fully and in detail the impact on the need-for-power analysis of the recent conservation effect noted in TG&E's sales figures over the last 3 years. Update the need-for-power analysis based on the most recent sales figures for all participants.

4. State fully and in detail all plans for security to prevent theft of radioactive material associated with ANPP.





5. State fully and in detail the effect upon the financial viability of the ANPP should the bond ratings for any of the participants decline.

6. State fully and in detail all comparisons of radioactive hazards between fossil fuel and nuclear plants. Include data from the three Four Corners coal plants.

7. State fully and in detail the management structure of the ANPP. State fully and in detail the relationship of APS to the other participants vis-a-vis the management and operation of ANPP.

8. State fully and in detail the extent of authority of any governmental body other than NRC has over any aspect of the ANPP. Include all relevant Federal, State and local governmental units in California, Arizona and New Mexico. State fully and in detail what the relationship is between NRC and other Federal, state and local governmental units.

9. State fully and in detail all plans, considerations and projections for contingency power generation in event that NRC rejects the application for the ANPP.

