

*NRC Central*

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY, ET AL. ) Docket No. 50-320  
 )  
(Three Mile Island Nuclear Station, Unit 2) )

NRC STAFF MOTION TO COMPEL INTERVENORS  
TO RESPOND TO NRC STAFF'S INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS  
DATED OCTOBER 18, 1976

Pursuant to 10 CFR §§ 2.740b and 2.741 of the Commission's Rules of Practice and in accordance with an agreement among the parties as to a schedule for discovery (Tr. 54), on October 18, 1976, the NRC Staff served interrogatories and a request for production of documents on Intervenor Citizens for a Safe Environment/York Committee for a Safe Environment. In accordance with the agreed-upon discovery schedule allowing 45 days for responses to discovery requests following their receipt, the Intervenor's responses should have been filed by December 6, 1976 (allowing three days for receipt of the discovery request). To date we have not received any response to our October 18, 1976 discovery request. Accordingly, the Staff moves the Board, pursuant to § 2.740(f) of the Commission's Rules of Practice, to compel Intervenor to respond to the Staff's October 18, 1976 discovery request.

Respectfully submitted,  
*[Signature]*  
Henry J. McGurren  
Counsel for NRC Staff **64-182**

Witness my hand and seal at Bethesda, Maryland  
this 13th day of December, 1976

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF MOTION TO COMPEL INTERVENORS TO RESPOND TO NRC STAFF'S INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS DATED OCTOBER 18, 1976" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or air mail, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 13th day of December, 1976:

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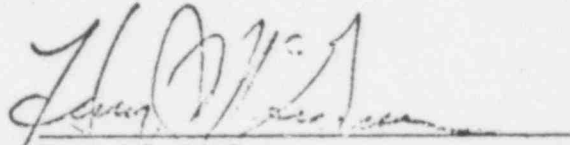
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