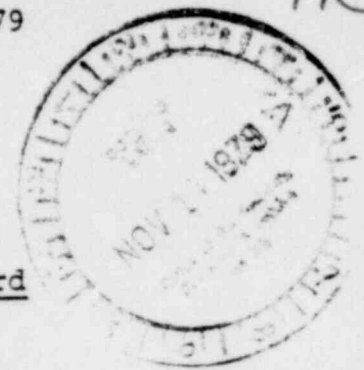


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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



Before the Atomic Energy and Licensing Board

In the Matter of	)	
	)	
LOUISIANA POWER & LIGHT COMPANY	)	Docket 50-382
	)	
(Waterford Steam Electric Station,	)	
Unit 3)	)	

APPLICANT'S FIRST INTERROGATORIES  
TO INTERVENOR LOUISIANA CONSUMERS'  
LEAGUE, INC.

Under the terms of the September 25, 1979 Stipulation on Discovery Schedule, approved by the Licensing Board on September 28, 1979, it was agreed that first round discovery requests with respect to the contentions initially allowed by the Licensing Board would be made within 60 days of the Licensing Board's Order on contentions, dated September 12, 1979. Applicant hereby files its first interrogatories pursuant to the approved Stipulation.

Under 10 C.F.R. Section 2.740b, these interrogatories are to be answered separately and fully in writing and under oath or affirmation. Answers must be served on all parties and the Licensing Board. As agreed in the Stipulation, Intervenors have forty-five (45) days to respond to this initial request, and fifteen (15) days to file objections to the interrogatory herein.

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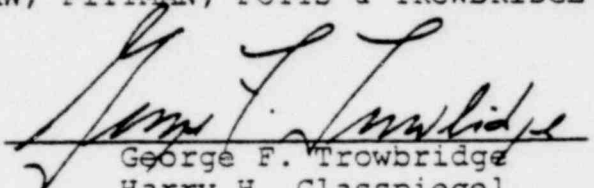
Interrogatory on Contention 3

3-1 Which statutes and/or judicial decisions form the basis for Contention 3(d). Identify statutes by title, date, and section numbers and provide citations to judicial decisions.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By:



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Dated: November 12, 1979

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
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LOUISIANA POWER & LIGHT COMPANY ) Docket 50-382  
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(Waterford Steam Electric Station, )  
Unit 3) )

SERVICE LIST

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