



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
The Cincinnati Gas & Electric )  
Company, et al. ) Pocket No. 50-358  
(Wm. H. Zimmer Nuclear Power Station )

MIAMI VALLEY POWER PROJECT'S OBJECTIONS  
TO CERTAIN OF NRC STAFF'S INTERROGATORIES

On April 20, 1979 the NRC staff filed its interrogatories for MVPP. For reasons stated hereinafter, MVPP objects to Interrogatories 14 and 25. MVPP is responding to the remainder of the interrogatories. MVPP further moves for a protective order, pursuant to 10 C.F.R. section 2.740 (c), that the objectionable discovery not be had.

Interrogatories 14, 25, & 42 request summary of expert testimony to be presented at the hearings. Because a date has already been set when all parties must submit in writing all testimony to be presented, it would be unfair for one party to require another party to provide such information prior to the date set. Such a requirement would have the effect of moving a deadline ahead for the party from whom the request is made.

For the foregoing reasons the stated interrogatories are objectionable and MVPP's motion for a protective order should be granted.

Respectfully submitted,

*Leah S. Kosik*

Leah S. Kosik  
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