

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF)	
)	
COMMONWEALTH EDISON COMPANY)	DOCKET NOS. 50-295
)	50-304
(Zion Station Units 1 and 2))	
)	
Proposed Amendments to)	
Increase Spent Fuel Storage)	
Capacity (43 F.R. 30938))	

INTERVENOR'S THIRD SET OF INTERROGATORIES
REQUEST FOR DOCUMENTS

Pursuant to the Regulations of the Nuclear Regulatory Commission, 10 C.F. R. Part 2, The State of Illinois propounds Interrogatories and requests documents as follows.

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply:

1. "Applicant" shall include the Commonwealth Edison Company, its agents, employees, attorneys, investigators and all other persons directly or indirectly subject to company control in any way.

2. The words "Person" or "Persons" shall mean, without limitation, all entities including all predecessors in interest, individuals, associations, companies, partnerships, jointventures, corporations, subsidiaries, departments, bureaus, public agencies and boards.

3. "Documents" shall mean all written or recorded material of any kind or character known to Applicant or in Applicant's

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possession, custody or control, including , without limitation, letters, correspondence, telegrams, memorandums, notes, records, minutes, contracts, agreements, records or notations of telephone or personal conversations or conferences, inter-office communications, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, articles, treatises, teletype messages, invoices, tape recordings and worksheets.

4. When used with respect to a document, "Identify" means, without limitation, to state its date, the type of document (e.g., letter, memorandum, telegram, chart, photograph, sound reproduction, etc.), the author and addressee, the present location and the custodian, and a description of its contents.

5. "Particularize" shall mean to describe in complete detail.

6. As used herein, the terms "and" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Interrogatories any information which might otherwise be construed to be outside its scope.

7. If any of the information contained in the answers to these Interrogatories is not within the personal knowledge of the person signing the Interrogatories, so state and identify each person, document, and communication on which he relies for the information contained in answers not based solely on his personal knowledge.

8. If the Applicant cannot answer any portion of any of the following Interrogatories in full, after exercising diligence to secure the information to do so, so state, and answer to the extent possible, specifying the inability to answer the remainder

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and stating whatever information or knowledge Applicant has concerning the unanswered portions.

INTERROGATORIES

Pursuant to 10 C.F.R. §2.740b, the State of Illinois (Intervenor) hereby requests that Commonwealth Edison Company (Applicant) answer separately and fully in writing, under oath or affirmation each of the following Interrogatories on or before May 25, 1979.

1. With respect to question 4(b) posed by the Licensing Board in its "order following Prehearing Conference" of January 19, 1979, State the names and address of each person expected to be called as an expert witness at the evidentiary hearing on this matter;

2. State and describe the subject(s) to be addressed and the substance of each witness's testimony, on question 4(b);

3. Identify and particularize any documents to be relied upon by each witness in regard to question 4(b);

These Interrogatories are continuing Interrogatories and require supplemental answers if Intervenor obtains further information between the time the answers are served and the time of an initial decision in the proceeding.

INTERVENOR'S REQUEST FOR PRODUCTION
OF DOCUMENTS BY APPLICANT

1. Pursuant to 10 C.F.R. §2.741, The State of Illinois (Intervenor) hereby requests that Commonwealth Edison (Applicant) make available to Intervenor the documents described in Applicant's answers to Interrogatory three (3) hereinabove on or before May 25, 1979.

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2. Pursuant to 10 C.F.R. §2.741, Intervenor requests Applicant to make available to Intervenor the following documents:

a. The Generating Station Emergency Plan (GSEP) for the Zion Nuclear Station, Units 1 and 2.


b. Any emergency or evacuation plans, implementation plans, procedures, monitoring plans, test or drill plans, coordination plans or any other documents relating to procedures for dealing with emergencies and/or evacuation involving the Zion Nuclear Plant.

c. Reports of any inspections, reviews, drills or practices of emergency and/or evacuation systems, plans and procedures made by Applicant, the Nuclear Regulatory Commission, the Illinois Emergency Services and Disaster Agency, the Illinois Department of Public Health or any other federal, state or local agency.

d. Any documents, letters, memoranda or other communications regarding the interaction of Applicant with federal, state and local law enforcement, fire, medical, civil defense, or emergency agencies.

State of Illinois
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Attorney General

BY:


SUSAN N. SEKULER
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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF)	
)	
COMMONWEALTH EDISON COMPANY)	DOCKET NOS. 50-295
)	50-304
(Zion Station Units 1 and 2))	
)	
Proposed Amendments to)	
Increase Spent Fuel Storage)	
Capacity (43 F.R. 30938))	



CERTIFICATE OF SERVICE

I hereby certify that copies of State of Illinois
THIRD SET OF INTERROGATORIES and REQUEST FOR DOCUMENTS dated
May 14, 1979 have been served upon the Applicant, COMMONWEALTH
EDISON COMPANY, by personal delivery upon their counsel of record,
and have been served upon all other persons on the foregoing
Service List by mailing a copy thereof addressed to each, first
class postage prepaid, at the United States Post Office, 160 North
LaSalle Street, Chicago, Illinois 60601, this 14th day of May,
1979.

Susan N. Sekuler

SUSAN N. SEKULER
Assistant Attorney General

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ZION SERVICE LIST

Edward Luton, Chairman
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Appeal Board Panel
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