



The State of Wisconsin
Department of Justice
Madison

53702

December 26, 1978

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RELATED CORRESPONDENCE
NRC PUBLIC DOCUMENT ROOM

Mr. Steven E. Keane
FOLEY AND LARDNER LAW OFFICES
777 East Wisconsin Avenue
Milwaukee, Wisconsin 53202



Dear Mr. Keane:

Re: In the Matter of Wisconsin Public Service Corporation, et al., Amendment to License No. DPR-43, Docket No. 50-305.

Enclosed please find the State of Wisconsin's Answers to Licensee's First Set of Interrogatories in the above-entitled matter. Copies have been sent to all parties listed below.

Sincerely,

Patrick Walsh
Assistant Attorney General

PW:kms
Enclosure

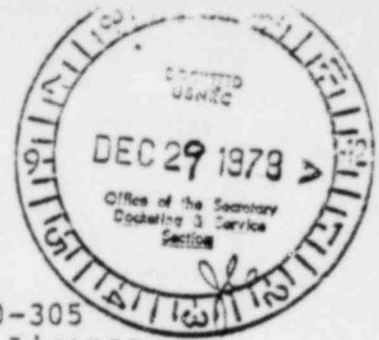
- cc: Mr. David A. Baker
- Mr. Jame Schaefer
- Mr. Victor Stello, Jr.
- U.S. Nuclear Regulatory Commission, *Office of the Secretary*
- Dr. Oscar H. Paris
- Mr. Glen O. Bright
- Mr. William Cordaro
- Ms. Mary Lou Jacobi
- Mr. Robert M. Lazo, Esq.
- Mr. William Olmstead
- Ms. Joan Kaeiser

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)	
)	Docket No. 50-305
WISCONSIN PUBLIC SERVICE CORPORATION, <u>ET AL.</u>)	Amendment to License No. DPR-43
)	(Increase Spent Fuel Storage Capacity)
(Kewaunee Nuclear Power Plant))	

STATE OF WISCONSIN'S ANSWERS TO LICENSEE'S
FIRST SET OF INTERROGATORIES

State of Wisconsin's answers the Licensee's First Set of Interrogatories as follows:

1. Answering interrogatory number one (1), at this time the state has not secured a qualified witness concerning any of the admitted contentions in this matter. Should the state do so in the future, the state will inform the other parties in this proceedings.

2. Interrogatory number two (2) is not capable to answer at this time.

3. Answering interrogatory number three (3), the state does not foresee relying on any documents other than those set forth by the staff and the licensee in their answers to interrogatories. Should documents not referred to therein be found and utilized by the state, the state will inform the other parties of this fact.

4. Answering interrogatory number four (4), based upon the analysis of the staff and sec. 5.3.2 of its environmental impact appraisal it appears unlikely that the combined emissions from the point beach nuclear plant and the Kewaunee nuclear plant will exceed regulatory levels.