

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)	
)	Docket No. 50-344
PORTLAND GENERAL ELECTRIC COMPANY,)	
<u>et al.</u>)	(Control Building Proceeding)
)	
(Trojan Nuclear Plant))	
)	
)	
)	

LICENSEE'S MOTION FOR ORDER
COMPELLING INTERVENORS NINA
BELL AND CONSOLIDATED INTERVENORS
TO RESPOND TO LICENSEE'S INTERROGATORIES

Portland General Electric Company ("Licensee") moves the Atomic Safety and Licensing Board for an order, pursuant to 10 CFR §2.740(f), compelling Intervenor Nina Bell and Consolidated Intervenor (hereafter collectively referred to as "Intervenor") to respond to "Licensee's First Set of Interrogatories to Intervenor Nina Bell and Consolidated Intervenor," dated March 5, 1979 ("Licensee's Interrogatories").

On February 26, 1979, Intervenor had submitted 25 contentions for the second phase of this proceeding. Licensee's Interrogatories were addressed to a number of these contentions in order to ascertain their bases, if any, with reasonable specificity. The interrogatories were stated very simply and were intended to obtain information, such as identification or clarification of Intervenor's concerns and the factual bases therefor, which is known to Intervenor alone. None of the interrogatories required any extensive effort for the preparation of responses by Intervenor.

2353 095

7906180 712

G

Since Licensee's Interrogatories were served personally upon
Intervenors on March 5, 1979,^{*/} pursuant to 10 CFR §2.740b(b), Inter-
venors were obligated to respond thereto by March 19, 1979. No
such responses have been received by Licensee.^{**/}

Therefore, Licensee respectfully requests that Intervenors be
ordered to respond to Licensee's Interrogatories.

Respectfully submitted,

RONALD W. JOHNSON, ESQ.
Corporate Attorney
Portland General Electric Company
121 S.W. Salmon Street
Portland, Oregon 97204

MAURICE AXELRAD, ESQ.
ALBERT V. CARR, JR., ESQ.
Lowenstein, Newman, Reis,
Axelrad & Toll
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

By Maurice Axelrad
Maurice Axelrad

Dated at Washington, D.C.
this 23rd day of March, 1979.

^{*/} A copy of Licensee's Interrogatories and a copy of the certifi-
cate of service are attached for the Board's convenience.

^{**/} Pursuant to 10 CFR §2.740(f), any motion to compel a response
has to be filed by March 29.

2353 096