

Docket
155

SHELDON, HARMON & WEISS

1725 I STREET, N.W.
SUITE 505

WASHINGTON, D. C. 20006

TELEPHONE
(202) 833-9070

KARIN P. SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

June 26, 1980

Janice Moore, Esquire
Office of Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Janice:

I have enclosed a set of interrogatories for the NRC staff in the Big Rock spent fuel case. Rather than go through the steps of obtaining Board approval for them at this point, I thought I would simply send them to you and see whether you have any objection answering them. This will allow us to avoid bothering the Board about them unless absolutely necessary.

Sincerely,

William S. Jordan, III

WSJ/lc

Enclosure

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SHELDON, HARMON & WEISS

1725 I STREET, N.W.
SUITE 506

WASHINGTON, D. C. 20006

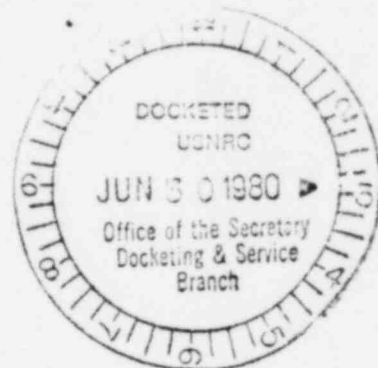
KARIN P. SHELDON
GAIL M. HARMON
ELLYN R. WEISS
WILLIAM S. JORDAN, III
ANNE LUZZATTO

RELATED CORRESPONDENCE

DOCKET NUMBER 50-159
PROD. & UTIL. FAC. TELEPHONE (202) 933-9070

June 26, 1980

Joseph Gallo, Esquire
Isham, Lincoln, and Beale
1120 Connecticut Avenue, N.W.
Suite 325
Washington, D.C. 20036



Dear Joe:

I have enclosed the affidavits of Christa-Maria, JoAnne Bier, and Shirley J. Johns in support of our earlier responses to your interrogatories. I have also enclosed our second set of interrogatories to Consumers Power Company and the NRC Staff. These were developed primarily by my clients after careful study of the information that you provided in response to the first set and to other information in the Charlevoix Public Document Room.

Sincerely,

A handwritten signature in cursive script, appearing to read "WSJ".

William S. Jordan, III

WSJ/lc

Enclosures

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RECEIVED APR 25 1980

RECEIVED JUN 3 1980

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



| | | |
|-------------------------|---|-----------------------------|
| In the Matter of |) | |
| |) | Docket No. 50-155 |
| CONSUMERS POWER COMPANY |) | |
| |) | (Spent Fuel Pool Expansion) |
| (Big Rock Point Nuclear |) | |
| Power Plant) |) | |

AFFIDAVIT OF CHRISTA-MARIA

Christa-Maria, being duly sworn, states that the responses to Licensee's Interrogatories 1, 2, 4, and 5, and those portions of the response to Interrogatory 3 that concern her appearance as a witness are true and correct to the best of her knowledge and belief.

Christa-Maria
Christa-Maria

Sworn and subscribed to before me this 23rd day of April, 1980.

Elaine Martin
Notary Public Elaine Martin

My Commission Expires August 10, 1983.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

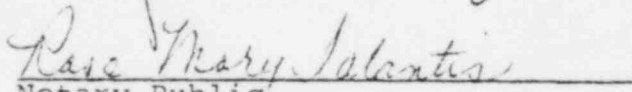
In the Matter of)
) Docket No. 50-155
CONSUMERS POWER COMPANY)
) (Spent Fuel Pool Expansion)
(Big Rock Point Nuclear)
Power Plant))

AFFIDAVIT OF JOANNE BIER

JoAnne Bier, being duly sworn, states that the responses to the Licensee's Interrogatory 3 concerning her appearance as a witness are true and correct to the best of her knowledge and belief.


JoAnne Bier

Sworn and subscribed to before me this 17 day of May, 1980.


Notary Public

*My commission expires July 30, 1983
Charlottesville*

RECEIVED MAY 21 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|-------------------------|---|-----------------------------|
| In the Matter |) | |
| |) | Docket No. 50-155 |
| CONSUMERS POWER COMPANY |) | |
| |) | (Spent Fuel Pool Expansion) |
| (Big Rock Point Nuclear |) | |
| Power Plant) |) | |

AFFIDAVIT OF SHIRLEY J. JOHNS

Shirley J. Johns, being duly sworn, states that the responses to the Licensee's Interrogatory 3 concerning her appearance as a witness are true and correct to the best of her knowledge and belief.

Shirley J. Johns

Sworn and subscribed to before me this 17 day of May, 1980.

Rose Mary Talantis
Notary Public

*My Commission expires July 20, 1983.
Charlottesville County*