

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
CONSUMERS POWER COMPANY)
)
(Big Rock Point Nuclear Power)
Station))
_____)

Docket No. 50-155

CHRISTA-MARIA, ET AL.,
INTERROGATORIES TO THE NRC STAFF

Pursuant to 10 CFR §2.720, Intervenor Christa-Maria, JoAnn Bier, and James Mills request that these interrogatories be answered fully, in writing, and under oath by any employees or representatives of the Nuclear Regulatory Commission Staff ("Staff") who have personal knowledge of the facts or issues in question. The answer to each interrogatory should contain the name and identification of each person supplying or contributing to the answer, whether or not he or she has verified the answer. The answer should also explain the role of each individual in preparing the answer.

Each question is to be answered in four parts as follows:

- A. Provide the direct answer to the question.
- B. Identify and provide all documents and studies, and the particular parts thereof, relied upon by the Staff as the basis for the answer.

- C. Identify and provide all documents and studies, and the particular parts thereof, examined but not relied upon by the Staff, which pertain to the subject matter in question.
- D. Explain whether the Staff or any independent contractor is presently engaged in further research or work that may bear on the issues covered in the interrogatory. If so, please identify the research or work and the people responsible for it.

General

1. With regard to each contention and Board Question admitted for litigation in this proceeding by the Atomic Safety and Licensing Board in its "ORDER FOLLOWING SPECIAL PREHEARING CONFERENCE" dated January 17, 1980, or its "MEMORANDUM AND ORDER REGARDING TWO ADDITIONAL BOARD QUESTIONS" dated March 27, 1980:

(a) Identify each person whom the Staff expects to call as an expert witness in respect of such contention or Board question;

(b) State the subject matter on which the expert witness is expected to testify;

(c) State the substance of the facts and opinions to which the expert witness is expected to testify and summarize the grounds for each opinion;

(d) Identify all documents relied upon or examined by the expert witness in answering subparagraph (c) above;

(e) Identify all documents not identified in subparagraph (d) above which the expert witness expects to put into evidence or to rely upon in support of his or her testimony in this proceeding.

2. Answer Interrogatory 1 above with respect to each contention identified as being withdrawn subject to reassertion in the Atomic Safety and Licensing Board's "ORDER FOLLOWING SPECIAL PREHEARING CONFERENCE" dated January 17, 1980.

3. With respect to each contention and Board Question admitted in litigation in this proceeding:

(a) Identify any person having knowledge of the facts relating to such contention or Board Question (other than the expert witnesses identified in response to Interrogatory 1). This question is limited to those persons whom the Staff expects to call as witnesses other than expert witnesses in this proceeding, or with whom the Staff has consulted or expects to consult in connection with this proceeding.

(b) For each person who has been consulted, state when he or she was consulted and summarize the substance of any facts or opinions communicated by such person to the Staff relating to the subject matter of any contention or Board Question.


(c) If the Staff expects to call any person identified in response to Interrogatory 3(a) above to testify, state the substance of his or her testimony, summarize the basis for any opinions contained in such testimony, and identify all documents which will be introduced as evidence or relied upon by such person in support of such testimony.

4. Answer Interrogatory 3 above with respect to each contention identified as being withdrawn subject to reassertion in the Licensing Board's "ORDER FOLLOWING SPECIAL PREHEARING CONFERENCE" dated January 17, 1980.

5. Identify all documents which the Staff expects to introduce in evidence or use for impeachment or other cross-examination purposes in this proceeding, other than those identified in the responses to the previous Interrogatories.

6. Please identify and provide copies of all NRC Staff memoranda, reports or other documents or memoranda discussing the progress of the Systematic Evaluation Program at the Big Rock Plant. Please include any reports or other documents or memoranda that discuss the progress of the SEP in general, without specific reference to Big Rock.

Respectfully submitted,


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DATED: June 26, 1980

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CERTIFICATE OF SERVICE

I hereby certify that copies of the Interrogatories to Licensee and Interrogatories to Staff have been mailed postage pre-paid this 26th day of June, 1980, to the following parties:

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