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FREEDOM OF INFORMATION
ACT REQUEST

FOIA-89-416
Rec'd 9/26/89

September 20, 1989

Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Donald Ray Riley vs. Scaffolding Rental and Erection
Service, Inc., et al; 29th JDC, Parish of St. Charles;
#26,482; Our File #7668

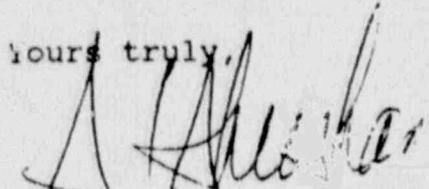
Dear Sir:

We represent a defendant in a suit filed by Mr. Donald Ray Riley related to an alleged accident during the construction phase of the Waterford III nuclear power plant in Taft, Louisiana. This accident allegedly occurred on March 7, 1983. We are trying to reconstruct the nature and location of the work which Mr. Riley was doing at the time of the alleged accident.

Under the Freedom of Information Act we request that you send us a copy of a small segment of the plans for the Plant Security System of Waterford III nuclear power plant in Taft, Louisiana. We are specifically interested in obtaining the original electrical plan for the exterior lighting system of the Fuel Handling Building. Also please provide us with a copy of the Design Change Notices (which should be attached to the original plan) designated as DCN NY E 928 SWO 57, DCN E 928 SWO 57, and DCN E 929 SWO 57. If we are interpreting the Daily Time Sheets provided by Mr. Riley's employer correctly, this may be in Building and Elevation 004 OB1 and in Building and Elevation OA6 OB1. As we represent a scaffolding manufacturer, we are particularly interested in determining the height at which Mr. Riley was working on the conduit. Any plans which would provide that information would be helpful.

Please inform us of any costs for copying and we will send you a check promptly. Thank you for your cooperation and assistance.

Yours truly,


Sidney L. Shushan

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SHUSHAN89-416 PDR