

ATOMIC ENERGY COMMISSION

In the Matter of)	
CONSUMERS POWER COMPANY)	Docket Nos. 50-329
Midland Plant, Units 1 and 2)	50-330

DOW OBJECTIONS TO SAGINAW INTERROGATORIES

Intervenor The Dow Chemical Company ("Dow"), by its trial attorneys, Kaye, Scholer, Fierman, Hays & Handler, herewith submits its objections to the Interrogatories which have been served by mail on March 22, 1971 by Intervenor Saginaw Valley Nuclear Study Group, et al. ("Saginaw").

Dow's objections are keyed to the Interrogatory Numbers used in the group of Interrogatories served on Dow ("Saginaw/Dow") and to the eleven categories of objections, identified by the letters "A" through "K", which is being served with these objections.

As stated in Dow's Supporting Memorandum, all objections are in addition to Dow's objection that the "good cause" required by the Regulations of the Atomic Energy Commission has not been shown by the Saginaw Intervenor.

Saginaw/Dow Interrogatory Number

Objections

1-232

I (In addition to the other specific objections to any such Interrogatory which have been repeated in Interrogatories 233 through 311)

8006200 861

Saginaw/Dow
Interrogatory
Number

Objections

234	A, D, G, K
235	A, G, J, K
236	A, D, G, K
237	A, E, G, K
238	A, F, G
239	A, G, K
240	Answered
241	C, K
242	B, G
243	A, D, F
244	Partially Answered. Objection: K
245	A, D, K
246	A, D, K
247	B, D
248	F, G, H, K
249	B, D, G
250	Answered
251	A, D
252	A, D, G, K
253	Answered.
254	A, D, G, K
255	A, D, G, K
256	C
257	Answered
258	C, D
259	G, H
260	A, D, G, H

Saginaw/Dow
Interrogatory
Number

Objections

291	A, D, I
292	Answered
293	Answered
294	Partially Answered. Objection: K
295	Answered
296	A, D, I
297	A, D, I
298	A, D, I
299	A, D, F, I
300	A, D, I
301	A, D, F, I
302	A, D, I
303	A, D, I
304	A, D, I
305	G, H, I
306	G, H, I
307	Answered
308	Answered
309	D, H, K
310	C, I
311	Partially Answered. Objection: A, D, E, F, G, I, K

Dated: New York, New York
March 30, 1971

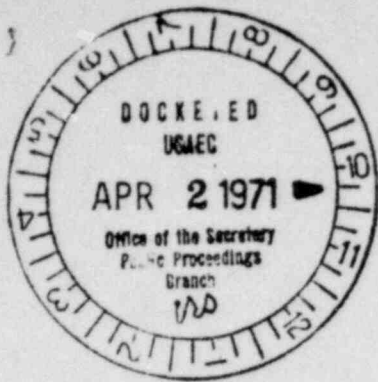
Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS
& HANDLER
Trial attorneys for The Dow
Chemical Company

Interrogatory
Number

Objections

261	Partially Answered. Objections: A, D, G, I, J
262	F, I
263	A, D
264	A, D, F
265	A
266	A, F, H
267	A, D, G
268	C
269	A, D, I, K
270	B, I
271	A, D, I
272	A, B, I
273	A, I
274	Answered
275	Answered
276	Answered
277	Answered
278	Answered
279	Answered
280	Answered
281	Answered
282	Answered
283	A, B, I
284	Answered
285	A, B, G
286	A, D, G, I, K
287	Answered
288	Answered
289	A, D, E, I



CERTIFICATE OF SERVICE

I, Milton R. Wessel, Esq., a member of the firm of Kaye, Scholer, Fierman, Hays & Handler, trial counsel to The Dow Chemical Company in the above matter, hereby certify in accordance with the provisions of 10 C.F.R. § 2.712(e)(2) that on March 30, 1971, I served a copy of the attached Dow Responses to Saginaw Interrogatories, and Dow Objections to Saginaw Interrogatories and Supporting Memorandum, by postage prepaid mail, upon the attorneys for each of the parties, whose names and addresses are listed below:

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