

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

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

MIDLAND NUCLEAR POWER COMMITTEE
OBJECTIONS TO SAGINAW INTERROGATORIES

Intervenor Midland Nuclear Power Committee, hereinafter "MNPC", by its counsel, Currie and Kendall, 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, hereinafter "Saginaw".

MNPC's objections and reasons therefore are as follows:

As to Interrogatories 1-232, MNPC objects to same on the grounds that there is no good cause shown for this discovery or against this intervenor. Further, parties other than MNPC are more well-qualified to respond to same to the extent allowable and as such these interrogatories are essentially redundant, burdensome, unproductive and irrelevant.

As to Interrogatories 234 through 241, MNPC objects to same on the grounds that each and every interrogatory attempts to elicit opinion not pertinent to the purpose of the within inquiry, and that no good cause is shown for same.

As to Interrogatory 242, MNPC objects to same on the grounds that no good cause is shown, that MNPC has no knowledge of the alleged instances referred to therein, that same are not in contention at these hearings and as such, if same ever occurred, are immaterial to these proceedings, and that if said incidents did occur and are relevant, material and allowable, that other parties to this proceeding are in a better position to respond to such interrogatory.

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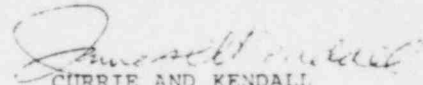
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As to Interrogatory 243, MNPC objects to same on the grounds that no good cause is shown, that same attempts to elicit opinion not pertinent to the purpose of this proceeding, that it constitutes an attempt to inquire into the meaning or effect of documents which speak for themselves and the significance of which will be determined by this Hearing Board, and that parties other than MNPC are more well-qualified to respond to same to the extent allowable.

Dated: Midland, Michigan

April 7, 1971

Respectfully submitted,



CURRIE AND KENDALL
Counsel for Midland
Nuclear Power Committee