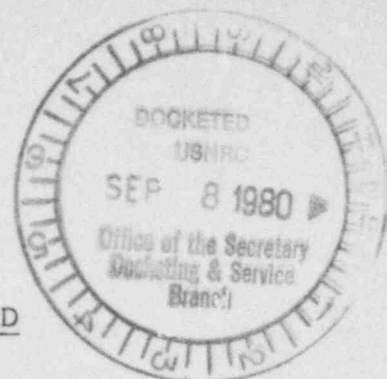


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF §

TEXAS UTILITIES GENERATING COMPANY, §
ET AL

Docket Nos. 50-445
50-446

(Comanche Peak Steam Electric §
Station, Units 1 and 2) §

28 Aug 80

ACORN'S OBJECTIONS TO APPLICANT'S FIRST
SET OF INTERROGATORIES AND MOTION FOR PROTECTION
AND FOR EXTENTION OF TIME TO ANSWER APPLICANT'S INTERROGATORIES

On August 18, 1980, ACORN received Applicant's First Set of Interrogatories to ACORN and Requests to Produce, consisting of 258 requests. ACORN objects to Applicant's Interrogatories in full and in general for the reason that the Interrogatories are burdensome and oppressive and designed to annoy and prejudice ACORN, and for the further reason that much of the information requested would be unnecessary, immaterial, and irrelevant in the trial of the contentions approved by the Board and is not reasonably calculated to relate to the discovery of evidence admissible at the hearing of ACORN's contentions.

ACORN specifically objects to Interrogatories 1, 2, 11, 26, 27, 31, 32, 44, 46, 57, 71, 72, 101, 102, 142, 143, 189, 190, 214, 215, 246, and 247 for the reason that the inquiry is not relevant to the pending litigation and is not reasonably

calculated to relate to the discovery of evidence admissible at time of the hearing on contentions approved by the Board. Further, ACORN objects that these interrogatories are a form of harassment and annoyance and an attempt to boot-strap an attack on the wording of contentions previously considered and admitted by the Board.

ACORN specifically objects to Interrogatories 4, 5, 34, 35, 74, 75, 104, 105, 146, 147, 193, 194, 218, and 219 for the reason that the inquiry is designed to be prejudicial and is not relevant to the subject matter involved in the contentions pending before the Board and is not reasonably calculated to relate to the discovery of evidence admissible at hearing on contentions. These interrogatories are designed to annoy and oppress ACORN in documenting and transmitting the information requested and are a form of harassment and intimidation.

In addition to the above objections and without waiving the same, ACORN would show that it is entitled to an order for protection from annoyance, expense and oppression due to the concerted efforts of Applicants to burden and harass ACORN at this early stage of the development of the issues before the Board. ACORN requests that the Board protect ACORN from lines of inquiry that have no purpose other than to invade the privacy of ACORN's membership and to chill participation in this proceeding or that seek to attack contentions previously

admitted by the Board by requiring further justification for those contentions.

Without waiving the foregoing, ACORN requests an extension of time to answer the interrogatories propounded by Applicants and would show the Board that counsel for ACORN will be away from his office on vacation and business between August 27, 1980, and September 20, 1980. In light of the absence of counsel and the fact that discovery is at such an early stage that responses to the interrogatories would be of little benefit to Applicants, ACORN should be granted this its first request for an extension of time.

Respectfully submitted,

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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IN THE MATTER OF	§	
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ET AL	§	
(Comanche Peak Steam Electric Station,	§	Docket Nos. 50-445
Units 1 and 2)	§	50-446
	§	

CERTIFICATE OF SERVICE

I hereby certify that copies of "ACORN's Objections to Applicant's First Set of Interrogatories and Motion for Protection and for Extension of Time to Answer Applicant's Interrogatories" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, on this 28th day of August, 1980.

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