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February 15, 1972



DOCKET NOS. 50-329 AND 50-330

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Gentlemen:

PORTRE LOWENT EIN

ANTHONY J. GAMBARDELLA, JR.

HAHULD F. HEIS

The purpose of this letter is to advise the Board and the parties of our planned responses to Saginaw intervenors' "Statement of Environmental Contentions," dated February 6, 1972.

Within the next several days, applicant will:

- File with the AEC and serve upon the parties applicant's comments upon Saginaw intervenors' "Statement of Environmental Contentions;"
- Serve and file a motion for order requiring Saginaw intervenors to respond to interrogatories respecting Saginaw intervenors' environmental contentions; and
- 3. Serve and file applicant's response to Exhibit A to Saginaw intervenors' February 6 statement. Exhibit A consists of (a) a motion for order permitting Saginaw intervenors to file detailed requests for discovery after the Board has ruled upon the scope of environmental inquiry; and (b) a request for identification of d cuments.



Arthur W. Murphy, Esq. Dr. David B. Hall Dr. Clark Goodman

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Many of the contentions included within Saginaw intervenors' "Statement of Environmental Contentions" dated February 6 are objectionable on one or more of several grounds, including (but without limitation) excessive generality, lack of relevance, matters barred as too late by prior order of the Board, and so forth. Applicant does not plan, however, at this time to file a motion to strike such contentions in view of the fact that Saginaw intervenors will have a further opportunity after issuance of AEC's final detailed environmental statement to submit additional contentions to the Board. As appropriate thereafter, applicant will file an appropriate motion designed to assist the Board in framing environmental issues for consideration at the prehearing conference and the hearing.

Respectfully yours,

RL:cae

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