

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
DAIRYLAND POWER COOPERATIVE) Docket No. 50-409
(La Crosse Boiling Water Reactor)) (FTOL Proceeding)

NRC STAFF REQUEST FOR ADMISSIONS

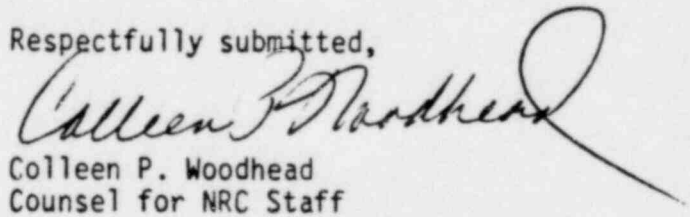
Pursuant to 10 CFR 2.742(a) the NRC Staff requests the following admissions of fact from Intervenor Coulee Region Energy Coalition (CREC).

1. The off-gas emissions from LACBWR are now in compliance with 10 CFR Part 50, Appendix I.
2. The off-gas emissions from LACBWR are minimal.
3. Doses to workers from LACBWR off-gas emissions are within 10 CFR Part 20 limits.
4. The radiological monitoring program for LACBWR is adequate.
5. No scientific evidence exists to show that a synergism of coal and nuclear effluents is more harmful than the separate effluents.
6. The following references in Contention 19 concerning LACBWR's:
 - small size
 - low operating efficiency
 - low megawatt hours of cumulative output
 - low unit capacity factor
 - substantial downtime
 - costs of spent fuel storage
 - costs of fuel and maintenancerefer solely to economic, monetary costs.
7. The only environmental costs alleged in Contention 19 are worker exposures during retrofits and decommissioning.
8. DPC uses a flat rate structure.

9. DPC has higher peak use rates in its time-of-use program.
10. DPC does not promote use of electricity.
11. Intervenor CREC has no evidence to show that energy conservation could reduce electric demand in the DPC service area by 50 MW.

Intervenor's attention is directed to 10 CFR § 2.742(b) which states that each requested admission shall be deemed made unless the party to whom the request is directed serves a sworn statement denying the matters for which admission is requested or explains why the admissions cannot be admitted or denied or serves written objections with appropriate explanation. 10 CFR § 2.742 states that admissions obtained by this procedure may be used in evidence.

Respectfully submitted,



Colleen P. Woodhead
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 12th day of August, 1980

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF SECOND ROUND INTERROGATORIES" and "NRC STAFF REQUEST FOR ADMISSIONS" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 12th day of August, 1980:

Charles Bechhoefer, Esq., Chairman*
Atomic Safety and Licensing Board
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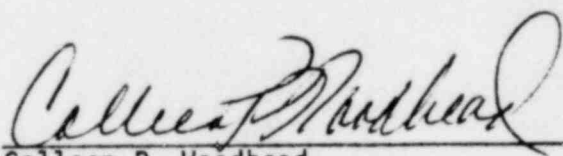
Atomic Safety and Licensing Board
Panel*
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Appeal
Panel (5)*
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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Docketing and Service Section (7)*
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Senator Allen R. Carter, Chairman
Joint Legislative Committee on Energy
P.O. Box 142
Suite 513 Senate Gressette Building
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A handwritten signature in cursive script, reading "Colleen P. Woodhead". The signature is written in dark ink and is positioned above a horizontal line.

Colleen P. Woodhead
Counsel for NRC Staff