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UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

EXHIBIT A TO INTERVENORS MOTIONS
FILED SEPTEMBER 30, 1971*

The following documents are the subject of Intervenor's Motion IX to produce documents, filed on September 30, 1971.

- A. All documents which fairly fall within or have reference to Sections 101(b) and 102 of the National Environmental Policy Act or the Atomic Energy Commission's Draft Guide to the Preparation of Environmental Reports issued in February, 1971;
- B. All documents dealing with currently available or to be available within the next five years anti-pollution equipment capable of being installed in conventional power plants, i.e.,

*The documents listed herein are required to be produced by each party to this proceeding who has such documents in its possession or in its control, whether such production is duplicative or not. The word "document" as used in this letter should be interpreted in the same manner as that word was defined in the last of each set of Intervenor's Interrogatories earlier addressed to each of the parties.

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any power plant other than a nuclear power plant;

- C. All documents dealing with the need over the next ten years for electricity in Applicant's franchised territory. This category also calls for all documents dealing with the basis for any such need, including but not limited to, amounts of money spent to promote use of electricity and/or to create a need;
- D. All documents dealing with the availability of alternatives to any need for electricity including, but not limited to the opportunity to Applicant to purchase all or part of said needed electricity from utilities which have a peak period different from Applicant or have or will have electricity available for sale. This category also calls for any documents dealing with costs of interconnection with utilities from whom electricity could be purchased in the event an interconnection with Applicant were accomplished;
- E. All documents dealing with the determination to site the proposed Midland Units including documents dealing with alternative sites and alternative types of power plants, including all costs and projected completion dates;
- F. All documents dealing with short and long range supplies of coal, oil and gas in the possession and control of or purchaseable by Applicant over the next ten years for use in conventional power plants;
- G. All documents dealing with short and long range supplies of uranium in the possession or control of or purchaseable by Applicant for use in nuclear power plants. This category fairly calls for information dealing with the fast breeder program to the extent that the fast breeder is to be relied upon for the production of uranium (or nuclear fuel) to be used in nuclear power plants;
- H. All documents dealing with the projected construction of power plants, of any kind, for the generation of electricity by any utility

from whom Applicant would purchase, or is capable of purchasing by reason of interconnection, electricity over the next ten years;

- I. All documents dealing with arrangements with utilities or others, to whom or from whom Applicant sells or purchases electricity or is, under certain conditions obligated by contract to sell or purchase electricity. This category fairly calls for copies of all contracts, setting forth Applicant's interconnection agreements as well as, for example, agreements with municipalities;
- J. All documents dealing with analyses of the balancing and rationalization, both long and short term, of natural resources which are or can be used in any kind of power plant;
- K. All documents dealing with Dow's present facilities for the production of process steam and electricity in Midland, insofar as they reflect analyses, studies or determinations dealing with the retrofitting of such facilities with anti-pollution equipment, including the specifics and costs thereof;
- L. All documents dealing with Dow's need for process steam and electricity, assuming first that it shuts down its current Midland electricity and steam facilities and then that it does not, specifying all alternatives, including costs and projected completion dates available to it, (whether such alternatives include the availability of gas or other natural resources to use as a power supply) including but not limited to the ability of Dow to expand elsewhere than Midland, Michigan. This category fairly calls for documents, studies and economic statistics dealing with the growth or inhibition of growth of Midland, Michigan to the extent that Dow's desire for process steam effects a decision to expand in Midland, Michigan rather than, for example, in Freeport, Texas; and documents dealing with the relative

cost of electricity and process steam
in the geographic area of possible Dow
expansion;

- M. All documents dealing with chemical explosions at Dow's Midland complex and elsewhere, whether at a Dow facility or not, within the past 20 years. This category fairly calls for the source of each such explosion, the character of the explosion, the chemicals or other explosives involved, the damages incurred and the physical characteristics of the explosion such as the direction of the blast and the geographic area effected by the blast;
- N. All documents dealing with the type and character of the expansion Dow intends to make in Midland, including the products which will be produced in and the pollution which will be generated by such expanded plants;
- O. All documents dealing with or showing the reliability, in terms of maintenance and forced outage, of each nuclear power plant in the United States and for each fossil fuel plant in the United States. There is no time limitation with respect to nuclear power plants, but with respect to fossil fuel plants, documents reflecting information earlier than 1955 are not called for;
- P. All documents dealing with the Applicant's plans for the next ten years for power production by any means, that is, whether by nuclear power or more conventional means, such as fossil fuel facilities;
- Q. All documents dealing with releases by Dow Chemical in normal and abnormal circumstances of any chemical, solid or substance, to the atmosphere or to the rivers and streams over the last ten years. This category calls for a specific description of each such chemical, solid or substance, whether released normally or abnormally, how such chemical was released, what steps were taken to prevent any such future release and whether such steps have been successful. This category of documents also fairly calls for the concentration of

such releases and the effects it has had upon rivers and streams and the atmosphere;

- R. All documents dealing with the interaction and/or additive effect, synergistically, mutagenically, carcinogenically, or otherwise of chemicals with radiation;
- S. All documents dealing with each analysis, in connection with the proposed Midland Units, for each section of the National Environmental Policy Act required to be so analyzed, including but not limited to review or analysis pursuant to Section 102(2)(D) of the National Environmental Policy Act;
- T. All documents dealing with thermal or other effects of any kind which are created, aided or abetted by the proposed cooling towers and cooling pond;
- U. All documents, analyses and studies dealing with the effects, if any, as a result of Applicant's proposed use of water from the Tittabawassee River, upon users of water from the Tittabawassee River, other than Applicant and for any purpose, whether industrial or not;
- V. All documents earlier called by each of the Intervenor's Interrogatories which were not produced upon the grounds that production was not relevant because the Interrogatories or documents related to environmental matters;
- W. All documents dealing with storage, transportation and disposal of radioactive waste products and spent fuel used or created by operation of the proposed Midland Units. This category fairly calls for information dealing with the entire question of radioactive waste disposal including what provisions will be made for off-site storage.
- X. All documents showing the status of procurement and manufacture of each component or system to be used or installed at the proposed Midland Units. This category fairly calls for all information dealing with how far anyone has gone in building or committing to build a facility not yet authorized by law in order to determine whether NEPA or this Board's authority is being infringed upon by the expenditure of funds and efforts.

- Y. All letters issued by the Advisory Committee on Reactor Safeguards to the Director of Regulation at any time in connection with each pressurized water reactor whether already licensed or whether the subject of an in-house application or licensing hearing.
- Z. Sufficient documents which set forth each so-called ACRS asterisked items regarding pressurized water reactors, which are still unresolved.