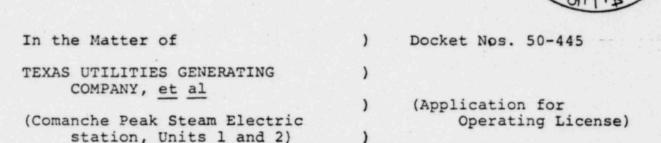
#### RELATED CORRESPONDENCE

### UNITED STATES OF AMERICA

#### NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



# CFUR'S RESPONSE TO APPLICANT'S SECOND SET OF INTERROGATORIES

- 1-2. The words of Contention l are intended to have their "plain meaning". See also CFUR's Answers to Staff Interrogatories Cl-1, Cl-2.
- 2-2. The basis for Contention 1 can be found in (a) Supplement to Petition for Leave to Intervene by Citizens for Fair Utility Regulations (CFUR), May 7, 1979; and (b) Transcript, Prehearing Conference, April 30, 1980.
- 3-2. No.
- 4-2. No.
- 5-2. Persons associated with CFUR have met with persons associated with other intervening parties, as well as with persons associated with Applicants and the Staff. While matters touching Contention 1 may have been discussed, none of these meetings was for the purpose of discussing Contention 1 and nothing pertaining to Contention 1 resulted therefrom.
- 6-2. None other than the hearing process.
- 7-2. Yes. The full extent of CFUR's participation is unknown at this time.
- 8-2. Not at this time.
- 9-2. Not at this time.
- 10-2. Not applicable.
- 11-2. See CFUR's Answers to Staff Interrogatories C1-5.
- 12-2. Not applicable.
- 13-2. See CFUR's Answers to Staff Interrogatories C1-3.

- 14-2. See CFUR's Answers to Staff Interrogatories C1-3.
- 15-2. See answer to 2-2 above.
- 16-2. See CFUR's Answer to Applicant's First Set of Interrogatories, Interrogatory 11-2.
- 17-2. Same as 16-2 above.
- 18-2. Same as 16-2 above.
- 19-2. Same as 16-2 above.
- 20-2. Same as 16-2 above.
- 21-2. See CFUR's Answers to Staff Interrogatories C1-7.
- 22-2. See CFUR's Answers to Staff Interrogatories Cl-7; and also the answer to 2-2 above.
- 23-2. No.
- 24-2. Not applicable.
- 25-2. Applicants are required to supply all information and analyses relating to safe operation, training, and maintenance, etc. of C.P.S.E.S. under all circumstances.
- 26-2. 10 C.F.R. Part 50.57(a).
- 27-2. CFUR is unable to understand this overly general and hypothetical question; therefore, CFUR is unable to formulate a meaningful response.
- 28-2. Not applicable.
- 29-2. Not applicable.
- 30-2. Not applicable.
- 31-2. Yes.
- 32-2. See answer to 11-2 above.
- 33-2. See answer to 11-2 above.
- 34-2. See answer to 11-2 above.
- 35-2. No.
- 36-2 Not applicable
- 37-2 See CFUR's Answers to Staff Interrogatories C1-7.
- 38-2. 10 C.F.R. Part 50.57(a).
- 39-2. See answer to 2-2 above.