

POOR ORIGINAL

CHACKES AND HOARE
ATTORNEYS AT LAW

KENNETH M. CHACKES
MICHAEL J. HOARE
LEE T. LAWLESS
JOHN D. LYNN

314 NORTH BROADWAY
ST. LOUIS, MO. 63102
(314) 241-7961

April 2, 1981

Secretary of the Commission,
U. S. Nuclear Regulatory Commission
Washington, DC 20555

46 FR 17216

Attention: Docketing and Service Branch

205

Re: Proposed Amendments to Rules of Practice

Dear Sirs:

As a representative of Intervenors in the matter of Union Electric Company (Callaway Plant, Unit 1) Docket No. STN 50-483 OL I strongly object to the proposed amendments aimed at streamlining the licensing proceedings.

My primary objection is to the elimination of formal discovery against the staff. Leaving it up to the staff to provide discoverable information at the hearing by cross examination of staff witnesses would greatly hinder the discovery process and would greatly expand the length of the hearing. If discovery cannot be conducted prior to the hearing all counsel will be unprepared for the hearing itself. Moreover, to leave discovery to the hearing would preclude follow-up discovery and could result in a tremendous waste of the licensing board members' time.

I also object to the proposed schedule, particularly the twenty-five day discovery period and time for filing revised contentions. Twenty-five days is far too short a time to allow meaningful discovery and would effectively limit parties to a single set of discovery requests. In addition, absolutely no time is allowed after the end of the discovery period for the preparation of revised contentions. Under the proposed schedule revised contentions must be filed immediately upon the end of the discovery period.

Sincerely,

CHACKES AND HOARE

Kenneth M. Chackes

Kenneth M. Chackes



8104160 218

L-441, Pt. 2