

March 25, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
GENERAL ELECTRIC CO.)	Docket No. 50-70
(Vallecitos Nuclear Center -)	(Show Cause)
General Electric Test Reactor,)	
Operating License No. TR-1))	

NRC STAFF OBJECTIONS TO INTERVENOR DELLUMS'
REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to the Memorandum and Order of the Atomic Safety and Licensing Board dated February 3, 1981, the NRC Staff herein files its objections to Intervenor Dellums' Request for Production of Documents (Request) dated March 16, 1981.

Requests for production of NRC records or documents are governed by 10 CFR § 2.744. That section mandates that a request:

"... shall set forth the records or documents requested, either by individual item or by category, and shall describe each item or category with reasonable particularity and shall state why that record or document is relevant to the proceeding." 10 CFR 2.744(a).

The Request contains no statement as to the relevancy of any of the documents requested. The Staff has been unable to independently determine the relevance of a number of the documents requested. Accordingly, the Staff objects to the production of documents numbered 1 through 15, 17, 18, 26, and 35 through 47 on the basis that they are not relevant to the issues in this proceeding.

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The Staff objects to the production of documents numbered 19 through 23, 25, 27 through 34, 49, 51 through 55, 57, 58, 60, 61.a, 61.b, 64, 66, 67, 69 as they do not fall within the category of an "NRC record or document not available pursuant to § 2.790" (10 CFR 2.744) or the documents are published and reasonably obtainable from another source.

The Staff also objects to the production of documents numbered 24, 50, 56, 59, 61.c, 68.a and 68.b, on the basis that the items requested are not described with reasonable particularity.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. G. Bachmann', with a long horizontal flourish extending to the right.

Richard G. Bachmann
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 25th day of March, 1981