

04/20/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

NRC STAFF MOTION
TO SUPPLEMENT RESPONSE TO DISCOVERY

Pursuant to 10 CFR 2.740(e) and the Memorandum and Order of the Atomic Safety and Licensing Board dated February 3, 1981, the Staff hereby moves the Board to allow the Staff to supplement its updated responses of February 25, 1981 to Friends of the Earth's Interrogatories dated April 19, 1978.

The Staff desires to add a witness to the list already submitted, who may be called in lieu of one or more of those named. The Staff makes this motion based on uncertainties in the availability of Staff witnesses. Since it will not be possible, prior to the hearing, to know the dates of particular testimony, the Staff believes it prudent to identify an additional witness who may be called. In this manner the chances for disruption of the proceedings caused by witness unavailability will be lessened.

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Based on the foregoing, the Staff moves that the Board approve the attached "Supplement to Updated NRC Staff Responses to Interrogatories of Friends of the Earth".

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard G. Bachmann", with a long horizontal line extending to the right.

Richard G. Bachmann
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 20th day of April, 1981