

04/20/81

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)	)	

SUPPLEMENT TO UPDATED NRC STAFF RESPONSES TO  
INTERROGATORIES OF FRIENDS OF THE EARTH

The NRC Staff hereby supplements its updated response, dated February 25, 1981 to Friends of the Earth's interrogatories dated April 19, 1978.

Intervenor Friends of the Earth interrogatory 1-3 reads, in pertinent part as follows:

- b. Identify which persons you intend to call as witnesses in this proceeding.
- c. Provide the addresses and educational and professional qualifications, and the employment record (including consulting) on any persons named in 1-3 a. or b.
- d. Identify which of those persons identified in b. above that you anticipate will appear voluntarily and which under subpoena.

Supplemental Staff Response

b. Add to list of individuals who may be called as witnesses to address specific matters within their area of expertise: Lyman W. Heller.

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- c. Professional qualifications are attached.
- d. Mr. Heller will appear voluntarily.

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 20th day of April, 1981

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GENERAL ELECTRIC COMPANY )  
(Vallecitos Nuclear Center - )  
General Electric Test Reactor, )  
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(Show Cause)

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF MOTION TO SUPPLEMENT RESPONSE TO DISCOVERY" and "SUPPLEMENT TO UPDATED NRC STAFF RESPONSES TO INTERROGATORIES OF FRIENDS OF THE EARTH" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, by deposit in the Nuclear Regulatory Commission's internal mail system, this 20th day of April, 1981:

Herbert Grossman, Esq., Chairman\*  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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Atomic Safety and Licensing Board  
Panel\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Atomic Safety and Licensing Appeal  
Panel (b)\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Docketing and Service Section (7)\*  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555



Richard G. Bachmann  
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