

August 19, 1981

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
KANSAS GAS & ELECTRIC COMPANY et al.) Docket No. STN 50-482
)
(Wolf Creek Generating Station,)
Unit No. 1))

APPLICANTS' FIRST REQUEST TO INTERVENOR
WANDA CHRISTY
FOR THE PRODUCTION OF DOCUMENTS



In accordance with the Licensing Board's July 15, 1981 "Order (Extension of Time)" and pursuant to 10 C.F.R. § 2.741, Applicants request that Intervenor Wanda Christy ("Intervenor") respond in writing to the following request for production of documents and produce the original or best copy of each of the documents requested below, on or before September 24, 1981, at the office of Richard Terrill, Esq., Kansas Gas and Electric Company, or at a place mutually convenient to the respective parties.

"Documents" means all writings and records of every type in the possession, control or custody of Intervenor, including but not limited to memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, speeches, articles,

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transcripts and all other records, written, electrical, mechanical or otherwise.

"Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody or control of Intervenor.

Applicants request that Intervenor produce each and every document identified or described in the answers to Applicants' First Set of Interrogatories to Intervenor Wanda Christy.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By



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Dated: August 19, 1981