

subject to Applicants' control in any way. "You" and "Yours" refers to Applicants.

"Documents" means all written or recorded material of any kind or character known to Applicants or in their possession, custody, or control, including, without limitation, letters, correspondence, telegrams, memoranda, notes, records, minutes, contracts, agreements, records or notation of telephone or personal conversations or conferences, inter-office communications, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, articles, treatises, teletype messages, invoices, tape recordings, computer printouts, and work-sheets.

When used with respect to a document, "identify" means, without limitation, to state its date, the type of document (e.g., letter, memorandum, telegram, chart, photograph, sound reproduction, etc.), the author and addressees, the present location and custodian, and a description of its contents.

When used with respect to a person, "identify" means, without limitation, to state his or her name, address, and occupation.

If Applicants cannot answer any portion of any of the interrogatories in full, after exercising due diligence to do so, so state, and answer to the extent possible, specifying the inability to answer the remainder and stating when Applicants expect to be able to answer the unanswered portions.

INTERROGATORIES

1. With respect to the NRDC contentions as phrased and admitted by the Licensing Board in its Memorandum and Order of July 6, 1982, identify all of Applicants' bases for opposing each contention.

2. With respect to each basis identified in your answer to Interrogatory 1, state whether the basis is supported by:

- A. One or more documents.
- B. Any type of study, calculation, or analysis.
- C. Research.
- D. Conversations, consultations, correspondence, or any other type of communications with one or more individuals.

3. If your answer to Interrogatory 2 is one or more documents:

- A. Identify each such document.
- B. Identify the information in each document which supports the basis.
- C. Explain how such information provides support for the basis.

4. If your answer to Interrogatory 2 is any type of study, calculation, or analysis:

- A. Describe the nature of the study, calculation, or analysis and identify any documents which discuss or describe the study, calculation, or analysis.

- B. When and where was the study, calculation, or analysis performed?
 - C. Identify the person[s] who performed the study, calculation, or analysis.
 - D. Describe the results of each study, calculation, or analysis.
 - E. Explain how such study, calculation, or analysis provides support for the basis.
5. If your answer to Interrogatory 2 is research:
- A. Describe all such research and identify each document discussing or describing such research.
 - B. When and where was the research conducted?
 - C. Identify the person[s] who conducted the research.
 - D. Explain how such research provides support for the basis.
6. If your answer to Interrogatory 2 is conversations, consultations, correspondence, or any other type of communications with one or more individuals:
- A. Identify each such individual.
 - B. State the educational and professional background of each such individual, including occupation and institutional affiliations.
 - C. Describe the nature of each communication with each such individual, when it occurred, and identify all other individuals involved.

D. Describe the information received from each such individual and explain how it provides support for the basis.

E. Identify each letter, memorandum, tape, note, or other record related to each conversation, correspondence, or other communication with such individual.

7. At the evidentiary hearing in this proceeding, do Applicants intend to offer the testimony of any witnesses in opposition to the NRDC contentions as phrased and admitted by the Licensing Board in its Memorandum and Order of July 6, 1982?

If yes,

A. Identify each such witness.

B. State the educational and professional background of each such witness, including occupation and institutional affiliations.

C. Specify the subject matter, by contention and basis, upon which each such witness will testify.

8. At the evidentiary hearings in this proceeding, do Applicants intend to offer any documents into evidence in opposition to the NRDC contentions as phrased and admitted by the Licensing Board in its Memorandum and Order of July 6, 1982?

If yes,

A. Identify each such document.

B. Specify the subject matter, by contention and basis, to which each such document relates.

C. Identify the information in each such document which relates to the contention and basis.

D. Explain how the information identified in Interrogatory 8.C provides support for Applicants' opposition to the contention.

9. At the evidentiary hearings in this proceeding, do Applicants intend to offer any evidence in opposition to the NRDC contentions that is not identified in your answer to Interrogatories 7 or 8? If yes,

A. Identify the nature of each such evidence.

B. Specify the subject matter, by contention and basis, to which each such evidence relates.

C. Explain how such evidence provides support for the contention and basis.

DATED: September 17, 1982

Respectfully submitted,

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