

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF )  
ILLINOIS POWER COMPANY, )  
SOYLAND POWER COOPERATIVE, INC. )  
and WESTERN ILLINOIS POWER )  
COOPERATIVE, INC. ) Docket Nos. 50-461 OL  
) 50-462 OL  
(Operating Licenses for Clinton )  
Power Station, Units 1 and 2) )

THE STATE OF ILLINOIS'  
SECOND REQUEST FOR  
PRODUCTION OF DOCUMENTS  
BY APPLICANTS

The State of Illinois (Illinois) hereby requests that applicants, Illinois Power Company, Soyland Power Cooperative, Inc., and Western Illinois Power Cooperative, Inc. (collectively, IP) produce the documents listed below, pursuant to Section 2.741 of the Nuclear Regulatory Commission (NRC) Rules of Practice. Illinois requests that IP produce said documents, for inspection and copying, at the Office of the Attorney General for the State of Illinois, 500 South Second Street, Springfield, Illinois, by December 15, 1981, or at such time and place as Illinois and IP may agree.

I. Definitions

1. "CPS-1" refers to the Clinton Power Station, Unit 1.
2. "Document" means the original and non-conforming copies of written, printed, typed or graphic material of any kind or character, including, but not limited to, correspondence, letters, telegrams, memoranda, notes,

records, minutes, contracts, agreements, records, studies, pamphlets, books, articles, treatises, records or notations of personal conversations or conferences, inter-office communications, micro-film, bulletins, circulars, blue prints, plans, drawings, photographs, teletype messages, invoices, tape recordings, and work-sheets, together with all copies of said documents by whatever means made, in the custody, care, possession or control of any officer, director, employee, agent, consultant, attorney or representative of IP. Identification of copies of the original is necessary if there is material in the original or any copy that is not in other copies of the original.

3. "Person" means an individual, agent, partnership, firm, company, consultant, corporation, association, political sub-division, governmental agency, or any other legal entity, or its legal representative, agent or assign.

## II. Documents Requested

1. All documents IP has itemized in each answer to Illinois' second set of interrogatories.
2. NEDO 20566 and any supplements thereto.
3. A letter to NRC from General Electric Company (GE), entitled "GE Fuel Clad Swelling and Rupture Model," dated May 15, 1981.
4. All Baldwin Associates' (BA) Quality Control (QC) or Quality Assurance (QA) audit reports, including, but

not limited to:

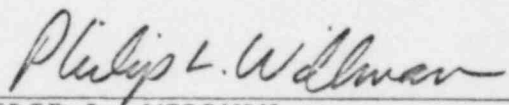
- a) I-134, dated January 10-16, 1980;
  - b) I-137, dated February 16 and 17, 1980;
  - c) I-150, dated June 17-23, 1980; and
  - d) report dated August 7, 1980.
5. A Corrective Action Request, No. 049, dated February 29, 1980.
  6. A report of QA review of documentation system, dated September 1980.
  7. A letter from IP Supervisor, Construction QA, to BA Manager, Quality and Technical Services, on the documentation system, dated October 23, 1980.
  8. A letter to IP management from the IP Director of QA, transmitting a special QA report, and the QA report.
  9. All documents related to NRC's Systematic Assessment of License Performance Review of IP and CPS-1, particularly a report dated November 12, 1980.
  10. A memorandum from BA Resident Engineer to BA Senior Piping Engineer on employment policy, dated February 17, 1981.
  11. A report by Theodore Barry and Associates, comparing CPS-1 construction cost overruns and delays to the nuclear industry.

12. All documents related to meetings held between IP and NRC.
13. All documents related to meetings held between IP and GE.
14. All documents related to meetings held between IP and BA.
15. All documents related to meetings held between IP and Sargent and Lundy.
16. All documents related to IP's Commitment Control Program.
17. All documents related to IP's NRC Regulatory Guide Compliance Program.

Respectfully submitted,

TYRONE C. FAHNER  
Attorney General  
State of Illinois

BY:

  
PHILIP L. WILLMAN  
Assistant Attorney General  
Environmental Control Division  
188 West Randolph Street  
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Chicago, Illinois 60601  
(312) 793-2491

DATED: November 16, 1981

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NOTICE

TO: Hugh K. Clark, Esq., Chairman  
P.O. Box 127A  
Kennedyville, Maryland 21645

Dr. George A. Ferguson  
School of Engineering  
Howard University  
2300 Sixth Street, N.W.  
Washington, D.C. 20059

Dr. Oscar H. Paris  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Richard J. Goddard  
Office of the Executive Legal Director  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Peter V. Fazio, Jr.  
Schiff, Hardin, & Waite  
7200 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606

Prairie Alliance  
P.O. Box 2424  
Station A  
Champaign, Illinois 61820

Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

PLEASE TAKE NOTICE that today I have caused to be filed with the Secretary, United States Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Chief, Docketing and Service Section, one original and two conformed copies of the State of Illinois' Second Set of Interrogatories and Request for Production of Documents to Applicants. Copies of these documents are attached and served upon you.

Respectfully submitted,

TYRONE C. FAHNER  
Attorney General  
State of Illinois

BY: Philip L. Willman  
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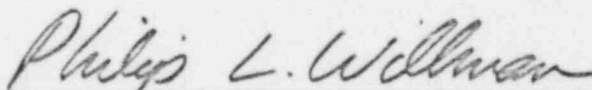
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CERTIFICATE OF SERVICE

I hereby certify that I served copies of the State of Illinois' Second Set of Interrogatories and Request for Production of Documents to Applicants on the persons on the attached Notice by causing them to be deposited in the United States mail, first class, postage prepaid, on this 16th day of November, 1981.

  
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PHILIP L. WILLMAN