

12/15/81

RELATED CORRESPONDENCE

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12/15/81

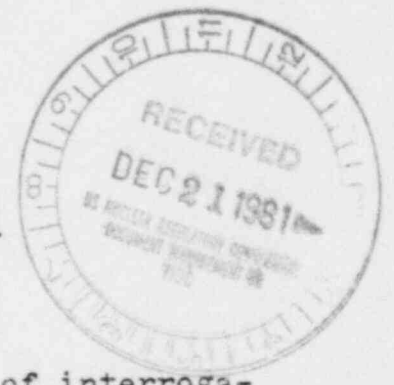
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'81 DEC 17 P2:03

OFFICE OF SECRETARY
OPERATING & SERVICE
BRANCH

IN THE MATTER OF)
ILLINOIS POWER COMPANY,)
SOYLAND COOPERATIVE, INC.)
and WESTERN ILLINOIS POWER)
COOPERATIVE, INC.)
(Operating licences for)
Clinton Power Station, Unit 1)

Docket No. 50-461 OL



RESPONSES OF INTERVENORS TO
APPLICANT'S SECOND SET OF INTERROGATORIES

A..General

1. The person signing the answers to the second set of interrogatories on behalf of intervenor is Charles Bacon.
2. Persons who participated in the preparation of these answers are: Charles Bacon, Paul Mueth, Jean Foy, Joanne Schwart, Susan Bruck. All of the above mentioned individuals contributed opinions in informal discussions. In addition, Mr. Mueth independently re-searched the answers to the interrogatories on contention #6.
3. To date, no agreement between intervenors and consultants has been reached either written or oral.
4. Intervenor objects to the kind of question presented in General Interrogatory number 4 on the grounds that it is irrelevant to the nature of these proceedings.

B. Contention No. 3

Interrogatories having to do with Nos. 3 and 10 will be answered by the Illinois State's Attorney General's Office.

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C. Contention No. 6

The only portion of contention 6 that has been affected by discovery at this point is that of the indication of relief valve status; the combination of monitoring discharge tube temperature and acoustic monitoring of relief valve provides a redundant, hence positive indication as required by the regulations. The document referred to in regard to this question is: Electric Power Research Institute TP-1313 Project 1246-1, Feb., 1980.

Documents assembled by IP in response to first round discovery by intervenor have not been provided to individuals of the Prairie Alliance. It is hoped that action upon the intervenor's motion to compel will rectify this situation.

D. Contention No. 9

Nothing new with respect to contention No. 9 has been discovered since documents were unavailable and applicant is now claiming proprietary rights on documents pertinent to contention No.9.

F. Contention No. 11

No new discovery has been made also as a result of the unavailability of documents pertinent to this contention.

Charles Bacon

A Representative of Prairie Alliance

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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

Executive Legal Director
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Philip L. Willman
Assistant Attorney General
Environmental Control Division
188 West Randolph Street
Suite 2315
Chicago, Illinois 60610

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

PLEASE TAKE NOTICE that I have filed with the Secretary of the United States Nuclear Regulatory Commission Prairie Alliance's responses to the Applicants Second Set of Interrogatories in the above captioned matter. A copy of this document is attached hereto and hereby served upon you.


A Representative of Prairie Alliance

CERTIFICATION OF SERVICE

I certify that I caused an original and two copies of the foregoing document to be served on the following:

Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Docketing and Servicing Branch .

and that I caused one copy of the foregoing document to be served upon each of the following:

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

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

Atomic Safety & Licensing
Appeal Board Panel
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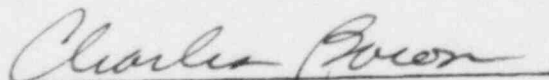
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in each case by deposit in the United States Mail, postage prepaid on the

15 day of Dec. 1981.



Charles Bacon
Representative for Prairie Alliance