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OFFICE OF SECRETARY  
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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. 50-482  
 )  
(Wolf Creek Generating Station, )  
Unit No. 1 )

APPLICANTS' RENEWED MOTION TO COMPEL ANSWERS  
OF INTERVENORS CHRISTY AND SALAVA TO INTERROGATORIES

"Applicants' Motion To Compel Answers of Intervenor Christy To Applicants' Interrogatories" and "Applicants' Motion To Compel Answers of Intervenor Salava To Applicants' Interrogatories" were filed on October 8, 1981. The "Answer of Intervenors, Christy and Salava, To Motion To Compel Answers To Interrogatories" was filed October 23, 1981.<sup>\*/</sup> Subsequently, the Board directed the parties to attempt to resolve their discovery disputes informally.

Counsel for Applicants and counsel for Ms. Christy and Ms. Salava have discussed the matter, but agree that Board action will be necessary for the disposition of Applicants' motions, to the extent that those motions seek to compel responses to interrogatories on emergency planning issues. Counsel for Ms. Christy and Ms. Salava has agreed, in a telehphone conversation with counsel

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<sup>\*/</sup> One of Intervenors' main arguments is that they should not be required to respond to discovery requests on their emergency planning contentions until the emergency plans have been formally adopted by the respective governmental bodies. Applicants disagree with the merits of Intervenors' position. See Applicants' Motions, at 2-3. However, Intervenors' concern with respect to the Coffey County plan has been rendered moot. The Coffey County Commissioners recently approved the county plan; an updated copy of that document is being provided to counsel for Intervenors under separate cover.

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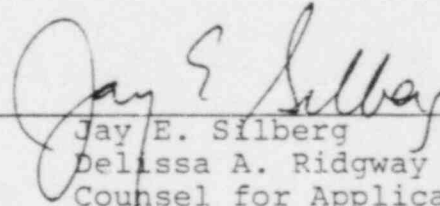
for Applicants, to respond to Applicants' interrogatories on financial qualifications. Therefore, the Board need not now reach Applicants' requests for orders compelling the responses of Ms. Christy and Ms. Salava to Interrogatories FQ-1 through FQ-23.

Accordingly, Applicants renew their motions for orders compelling Ms. Christy and Ms. Salava to respond fully to Applicants' Interrogatories EP-4, EP-5, EP-7, EP-8, EP-9, EP-11, EP-12, EP-15 and EP-16, and Interrogatory EP/FQ.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By

  
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Dated: December 15, 1981

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing  
"Applicants' Renewed Motion To Compel Answers Of Intervenors  
Christy And Salava To Interrogatories" were served, by deposit  
in the U.S. Mail, first class, postage prepaid, to all those on  
the attached service list this 15th day of December, 1981.

  
\_\_\_\_\_  
Delissa A. Ridgway

Dated: December 15, 1981

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