

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)
ILLINOIS POWER COMPANY,)
SOYLAND POWER COOPERATIVE, INC.) Docket No. 50-461 OL
and WESTERN ILLINOIS POWER)
COOPERATIVE, INC.)
(Operating License for Clinton)
Power Station, Unit 1))

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

Illinois Power Company ("Illinois Power" or "the Company" or "IP"), on behalf of itself, Soyland Power Cooperative, Inc., and Western Illinois Power Cooperative, Inc. (collectively "Applicants"), responds as follows to the State of Illinois' ("the State") Second Request for Production of Documents by Applicants:

- [1. All documents IP has itemized in each answer to Illinois' second set of interrogatories.]

ANSWER: Any document in Applicants' possession, custody, or control itemized in an answer to an interrogatory to which no objection is made will be available for inspection at the offices of Illinois Power.

- [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.]

OBJECTION: Illinois Power objects to Document Request Nos. 2 and 3 on the grounds that the documents requested were produced in the first round of discovery in response to Interrogatory No. 46.d of the State's First Set of Interrogatories and in response to the State's First Request for Production of Documents.

- [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.]

OBJECTION: Illinois Power objects to Document Request Nos. 4 through 8 on the grounds that the documents requested were provided in response to Interrogatory No. 4 of the State's First Set of Interrogatories and in response to the State's First Request for the Production of Documents.

[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.]

OBJECTION: Illinois Power objects to Document Request No. 9 on the grounds that:

(1) many of the documents requested were provided in response to Interrogatory Nos. 4 and 5 of the State's First Set of Interrogatories and in response to the State's First Request for the Production of Documents, and

(2) the production of other documents requested is beyond the scope of second round discovery since these documents are not necessary for the clarification of any response to first round discovery requests.

[10. A memorandum from BA Resident Engineer to BA Senior Piping Engineer on employment policy dated February 17, 1981.]

OBJECTION: Illinois Power objects to Document Request No. 10 on the grounds that the document requested was provided in response to Interrogatory No. 5 of the State's First Set of Interrogatories and in response to the State's First Request for the Production of Documents.

[11. A report by Theodore Barry and Associates, comparing CPS-1 construction cost overruns and delays to the nuclear industry.]

OBJECTION: Illinois Power objects to Document Request No. 11 on the grounds that all documents relating to matters raised in the request were provided in response to Interrogatory No. 5 of the State's First Set of Interrogatories

and in response to the State's First Request for Production of Documents. These documents are part of the public record in Illinois Power's 1979 rate case, Illinois Commerce Commission Docket No. 79-0071.


- [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.]

OBJECTION: Illinois Power objects to Document Request Nos. 12 through 17 on the grounds that:

(1) many of the documents requested were provided in response to Interrogatory Nos. 4 and 5 of the State's First Set of Interrogatories and in response to the State's First Request for Production of Documents, and

(2) the production of other documents requested is beyond the scope of second round discovery since these

documents are not necessary for the clarification of any response to first round discovery requests.



One of the Attorneys for Applicants

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Dated: December 15, 1981

CERTIFICATE OF SERVICE

I hereby certify that the original of each of the foregoing documents was served upon the following:

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

that three conformed copies of each of the foregoing documents were filed with the following:

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

and that one copy of each of the foregoing documents was served upon each of the following:

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.
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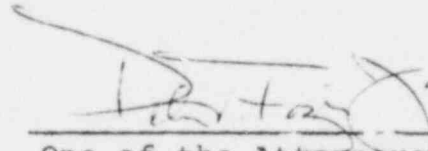
Dr. Oscar H. Paris
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Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
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in each case by deposit in the United States Mail, postage
prepaid on December 15, 1981.



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NOTICE

To:

Hugh K. Clark, Esq., Chairman
P. O. Box 127A
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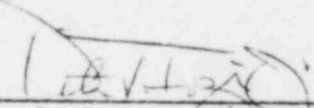
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PLEASE TAKE NOTICE that I have today served upon Philip L. Willman, Assistant Attorney General, Environmental Control Division, 188 West Randolph Street, Suite 2315, Chicago, Illinois 60610, and have filed with the Secretary of the United States Nuclear Regulatory Commission RESPONSE OF ILLINOIS POWER TO THE STATE OF ILLINOIS' SECOND SET OF INTERROGATORIES TO APPLICANTS and RESPONSE OF ILLINOIS POWER TO THE STATE OF ILLINOIS' SECOND REQUEST BY APPLICANTS FOR PRODUCTION OF DOCUMENTS in the above captioned matter. A copy of these documents is attached hereto and hereby served upon you.



One of the Attorneys for
Applicants

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