

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

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Before Administrative Judges:
Marshall E. Miller, Chairman
Gustave A. Linenberger, Jr.
Dr. Cadet H. Hand, Jr.

In the Matter of)

UNITED STATES DEPARTMENT OF ENERGY)
PROJECT MANAGEMENT CORPORATION)
TENNESSEE VALLEY AUTHORITY)
(Clinch River Breeder Reactor Plant))

Docket No. 50-537

NATURAL RESOURCES DEFENSE COUNCIL, INC.
AND THE SIERRA CLUB FIRST
REQUEST TO STAFF FOR
PRODUCTION OF DOCUMENTS

Pursuant to 10 CFR § 2.741, and in accordance with the Board's Prehearing Conference Order of February 11, 1982, Intervenor, Natural Resources Defense Council, Inc. and the Sierra Club, request that Staff provide at the Commission's office at 1717 "H" Street, N.W., Washington, D.C. copies of the following documents.

General

1. Provide a complete current version of the General Design Criteria which Staff believes is applicable to

the CRBR, to the extent it differs from the criteria set forth in Appendix A to the 1977 Staff Site Suitability Report. Identify whether it reports Final or Draft Criteria.

2. Provide copies of all documents and other materials provided to Staff by Applicants, since April 23, 1977, relating to meetings held between Applicants and Staff to review and discuss Applicants' PSAR and other matters in the CRBR LWA and CP application. This request is a continuing one, and applies to all documents and materials provided at all such future meetings.^{1/}

Contention 8

1. Please produce all documents, all staff proposals, and all staff documents submitted to the Commission at the time the Commission was considering the present regulations under 10 CFR § 20.1(c) with regard to the ALARA requirement.

^{1/} Intervenors believe a formal request for production of such documents and materials is necessary since an informal request by Intervenors to Staff on March 10, 1982 for such documents and materials was categorically denied. Intervenors believe that such a denial is in contravention of the Board's directive during the February 9-10, 1982 Prehearing Conference that the parties cooperate informally to the greatest extent possible and make full use of information presented during the ongoing review meetings between Staff and Applicants.

2. Provide all written correspondence, prepared since April 23, 1977, between Staff and the Environmental Protection Agency that provides NRC Staff's opinion with regard to the establishment of new occupational dose limits as proposed in drafts and proposed rules by the EPA during the last four years.

Respectfully submitted,

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Dated: March 18, 1982
 Washington, D.C.