

March 30, 1982

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Washington, D.C. 20036

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Council, Inc.
1725 Eye Street, N.W.
Suite 506
Washington, D.C. 20006

In the Matter of
UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGER CORPORATION
TENNESSEE VALLEY AUTHORITY
(Clinch River Breeder Reactor Plant)
Docket No. 50-537



Dear Eldon and Barbara:

In accordance with the Board's February 11, 1982 Prehearing Conference Order, the Staff has been reviewing the discovery requests served against it by NRDC prior to the suspension of this proceeding in 1977. As a first step toward providing current responses to that discovery, the Staff has classified the prior discovery into three categories: 1) first, those interrogatory and admission responses which are still applicable and need no updating; 2) those responses which will require a relatively minor update; and 3) those responses which require a substantial amount of effort to update, plus those interrogatory sets which were not responded to prior to the suspension of the proceeding in 1977. This discovery, of course, is limited to those interrogatories and requests for admissions that are still viable, i.e. they were not thrown out by the Board in an order prior to April, 1977.

Those responses which the Staff has placed in the first category are indicated below. The responses to the second and third categories will be provided in mid and late April, respectively. The information provided in this letter represents input from most of the Staff working on this proceeding. However, because of hearings and other travel, etc., I was unable to receive a breakdown of discovery responses from everyone involved in the updating process. Additional information will be provided as soon as it is available.

The following NRDC interrogatories and requests for admissions do not, in the Staff's view, need further updating by the Staff:

DESIGNATED ORIGINAL

Certified By

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1587
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8204010253 820330
PDR ADOCK 05000537
G PDR

Interrogatories:

Set 2: Question I(A)6, I(A)9, I(A)10, I(A)11, and I(A)15;
Question I(B)1, I(B)2, I(B)3, I(B)4, I(B)5, I(B)6, I(B)8, I(B)9,
I(B)10, I(B)11, I(B)12, I(B)13, and I(B)15; Question I(C)15.

Set 3: Question I(A)(1-15); Question I(B)(1-6), Question I(B)(8-15).

Set 7: Question I(B)(1-3), I(B)(5-15); Question III(5).

Set 8: Question I(1-4).

Set 9: Questions 3, 4 and 9.

Set 13: Question 2(a-b); Question 3(a-b); Question 5(a-d);
Question 6(a-c); Question 8(a-b); Question 10(a-b); Question 13(a-b);
Question 14; Question 16; Question 18; Question 21; Question 22;
Question 25(a-r); Question 26; Question 27(a-b); Question 28;
Question 29; Question 30; Question 33; Question 34; Question 36;
Question 37(d); Question 38; Question 39; Question 41; Question 42;
Question 45; Question 46; Question 48; Question 49 and Question 53.

Set 14: Question I(1-4); Question II(1,2); Question III(1-3);
Question V(2); Question V(3); Question VIII and Question IX(1-5).

Set 15: Question (1).

Set 16: Question (3-4).

Set 17: Question 4; Question 8; Question 9; Question 10; and
Question 11.

Admissions

8-13-76 Contention 2: 1a, 1b, 1c, 1d, 2, 3, 4, 5.

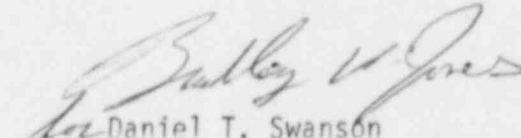
8-17-76 Admission No.: 1-10.

9-30-76 Admission No.: 2-13, 15-20, 22 (all), and 23.

1-18-77 Contention 2: 81-95.

The Staff would reserve the right to update these responses should it receive relevant new information which requires such a change.

Sincerely,


Daniel T. Swanson
Counsel for NRC Staff

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