

RELATED CORRESPONDENCE

April 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF THE
DOCKETING & SERVICE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
KANSAS GAS & ELECTRIC COMPANY <u>et al.</u>)	Docket No. STN 50-482
)	
(Wolf Creek Generating Station,)	
Unit No. 1))	

APPLICANTS' SECOND REQUEST
TO INTERVENOR CHRISTY
FOR THE PRODUCTION OF DOCUMENTS

This request for production of documents is filed pursuant to 10 C.F.R. § 2.741, which requires that Intervenor produce and either furnish copies of or permit Applicants to inspect and copy all documents responsive to the request and which are in the possession, custody or control of Intervenor. This request for production of documents is continuing in nature, like the accompanying "Applicants' Second Set of Interrogatories to Intervenor Christy," and Intervenor must produce immediately any additional documents they obtain which are responsive to the request for production.

Applicants request that Intervenor Wanda Christy respond in writing to the following request for production of documents and produce the original or best copy of each of the documents

requested below at the office of Richard Terrill, Esq., Kansas Gas and Electric Company, or at a place mutually convenient to the respective parties.

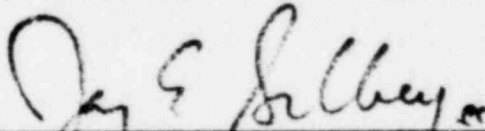
"Documents" means all writings and records of every type in the possession, control or custody of Intervenor, including but not limited to memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, speeches, articles, transcripts and all other records, written, electrical, mechanical or otherwise.

"Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody or control of Intervenor.

Applicants request that Intervenor produce each and every document identified or described in the answers to "Applicants' Second Set of Interrogatories to Intervenor Christy."

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By 

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Dated: April 1, 1982