

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

NRC STAFF'S UPDATED ANSWERS TO NATURAL  
RESOURCES DEFENSE COUNCIL, INC. AND  
THE SIERRA CLUB REQUEST TO APPLICANTS  
AND STAFF FOR ADMISSIONS DATED AUGUST 17, 1976

Pursuant to the Licensing Board's Prehearing Conference Order of February 11, 1982, the Nuclear Regulatory Commission Staff (Staff) hereby updates its September 7, 1976 response to Intervenors' Natural Resources Defense Council, Inc., the Sierra Club Request to Applicants and Staff for Admissions filed on August 17, 1976. Attached hereto are the Staff's answers to NRDC's and the Sierra Club's Request for Admissions, together with the unexecuted affidavit of Mr. Homer Lowenberg. A copy of Mr. Lowenberg's signed and notarized affidavit will be filed shortly.

Respectfully submitted,



Bradley W. Jones  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 27 day of April, 1982

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NRC STAFF'S ANSWERS TO NRDC's AND  
THE SIERRA CLUB'S REQUEST FOR ADMISSIONS

The NRC Staff has determined that previous responses to request for admissions #1 through #10 concerning Contention 9 (renumbered as 6 in the April 14, 1982 Order Following Conference with Parties ) are still applicable and need no updating.

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Docket No. 50-537

AFFIDAVIT OF HOMER LOWENBERG

I, Homer Lowenberg, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Chief Engineer, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering the Requests for Admissions pertaining to Contention 9 (renumbered as 6) #1 through 10 and I hereby certify that the answers given are true to the best of my knowledge.

\_\_\_\_\_  
HOMER LOWENBERG

Subscribed and sworn to before me  
this        day of April, 1982.

\_\_\_\_\_  
Notary Public

My Commission expires: