

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

SECRET

IN THE MATTER OF)
ILLINOIS POWER COMPANY,)
SOYLAND POWER COOPERATIVE,)
INC. and WESTERN ILLINOIS)
POWER COOPERATIVE, INC.,)
(Operating License for)
Clinton Power Station,)
Unit 1))

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Docket No. 50-461 OL



ILLINOIS' INITIAL RESPONSE TO
APPLICANTS' MOTION FOR A PROTECTIVE ORDER

The State of Illinois (Illinois) by Tyrone C. Fahner, Attorney General of the State of Illinois, hereby makes its initial response to the Applicants' Motion For a Protective Order, filed April 22, 1982. In support hereof, Illinois states as follows:

1. Applicants' Motion For a Protective Order concerns documents relating to Illinois Power's "Quality Report System" described in the Answer to Interrogatory No. 24 of the Supplemental Response of Illinois Power to the State of Illinois' Second Set of Interrogatories, dated March 16, 1982.

2. Pursuant to statements made on the record by counsel for Applicants at the second special prehearing conference held May 4, 1982 in Champaign and discussions had thereafter between counsel for Applicants and for Illinois, those named parties wish to explore the possibility of reaching an agreement on the question of disclosure and the conditions thereof. Within two weeks of the date of this response, these parties plan

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to meet and attempt to work out a disclosure agreement.

3. Given such events, Illinois requests that the Board defer its ruling on Applicants' Motion, until and unless the parties are unable to resolve voluntarily this disclosure question. Should the parties fail to resolve this matter, counsel for Illinois will so advise the Board and will contemporaneously file its substantive response to Applicants' Motion.

WHEREFORE, Illinois prays that the Board defer its ruling on Applicants' Motion for a Protective Order, until such time as it is notified of the parties' inability to otherwise resolve the matter and Illinois has filed its substantive response.

Respectfully submitted,

TYRONE C. FAHNER
ATTORNEY GENERAL
STATE OF ILLINOIS

BY:

Reed W. Neuman
Reed W. Neuman
Assistant Attorney General
Environmental Control Division
Southern Region

500 South Second St.
Springfield, IL 62706
(217) 782-9031

DATED: May 6, 1982

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N O T I C E

TO: 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.
Washington, D.C. 20059

Dr. Oscar H. Paris
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

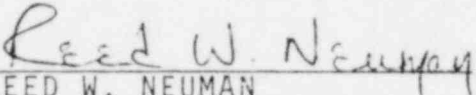
Sheldon Zabel
Schiff, Hardin & Waite
7200 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606

Jan L. Kodner
Tutt and Kodner
173 W. Madison St.
Suite 1004
Chicago, Illinois 60602

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

PLEASE TAKE NOTICE that I have today mailed for filing with the Secretary, United States Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Chief Docketing and Service Section, one original and two conformed copies of Illinois' Initial Response to Applicants' Motion for a Protective Order. A copy of this document is attached and served upon you.


REED W. NEUMAN
Assistant Attorney General
Environmental Control Division
Southern Region

500 South Second St.
Springfield, IL 62706
(217) 782-9031

DATED: May 6, 1982

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CERTIFICATE OF SERVICE

I hereby certify that I served copies of Illinois' Initial Response to Applicants' Motion for a Protective Order on the persons listed on the attached Notice by causing same to be deposited in the United States Mail, first class, postage prepaid, on this 6th day of May, 1982.

Reed W. Neuman
REED W. NEUMAN