

RELATED CORRESPONDENCE

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

02 APR 19 1982

*camp*

In the Matter of	)	
	)	
ARIZONA PUBLIC SERVICE	)	
COMPANY, et al.	)	Docket Nos. STN 50-528
	)	STN 50-529
(Palo Verde Nuclear	)	STN 50-530
Generating Station,	)	
Units 1, 2 and 3)	)	
	)	

SUBPOENA DUCES TECUM (CIVIL)

THE NUCLEAR REGULATORY COMMISSION AND ROBERT M. LAZO, CHAIRMAN,  
ATOMIC SAFETY AND LICENSING BOARD, TO: Patricia Lee Hourihan,  
6413 S. 26th Street, Phoenix, Arizona 85040.

YOU ARE HEREBY COMMANDED to appear and give your  
deposition upon oral examination in the above-captioned matter  
before an officer authorized to administer oaths on Monday,  
April 19, 1982, at 9:00 o'clock a.m., in the law offices of  
Snell & Wilmer, 3100 Valley Bank Center, Phoenix, Arizona 85073.

YOU ARE ALSO COMMANDED TO bring with you and produce  
any and all documents, within your possession, custody or  
control, regarding the below-listed subjects, other than those  
documents (1) produced by you pursuant to Joint Applicants' First  
Set of Interrogatories and Requests for Production of Documents  
to Intervenor, dated May 22, 1981, or (2) attached to any plead-  
ings filed by you in this proceeding and served on Joint Applicants.  
Documents regarding the following subjects must be produced:

1. Contention No. 5.
2. Allegations made by you during the telephone conference call on April 6, 1982, respecting construction deficiencies related to electrical work at Palo Verde Nuclear Generating Station.

For purposes of this Subpoena, "all documents" is used in its customary broad sense to mean all writings of any kind, including the originals and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, including without limitation, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, notations of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, telefax, invoices, worksheets, all drafts, alterations, modifications, changes and amendments of any of the foregoing, graphic or oral records or representations of any kind (including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotapes, recordings, motion pictures), and any electronic, mechanical, or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings, and computer memories).

You have been subpoenaed by Arizona Public Service Company, Salt River Project Agricultural Improvement and Power District, Southern California Edison Company, El Paso Electric Company, and Public Service Company of New Mexico, Joint Applicants in the above-captioned matter.

Pursuant to the Commission's regulations at 10 CFR §2.720(f), on motion by you made promptly, and in any event at or before 9:00 o'clock a.m. on April 19, 1982, and on notice to attorneys for Joint Applicants, the Chairman of the Atomic Safety and Licensing Board or, if he is unavailable, the Commission may (1) quash or modify the Subpoena if it is unreasonable or requires evidence not relevant to any matter in issue, or (2) condition denial of the motion on just and reasonable terms.

YOU ARE HEREBY NOTIFIED THAT ANY FAILURE TO OBEY THIS SUBPOENA MAY BE DEEMED A CONTEMPT AND APPROPRIATE SANCTIONS MAY BE ORDERED.

DATED THIS 12 day of April, 1982.

ATOMIC SAFETY AND LICENSING BOARD

By Robert M. Lazo  
Robert M. Lazo  
Chairman

In the

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

Cause Number:

STN 50-528; STN 50-529; STN 50-530

In the Matter of

ARIZONA PUBLIC SERVICE COMPANY, et al.

(Palo Verde Nuclear Generating Station,  
Units 1, 2 and 3)

82) Affiant of Service  
of Process by a  
Private Person

State of Arizona  
County of Maricopa

ss: The Affiant, being sworn, states: I am fully qualified to serve process in this cause, having been so appointed by the Court, that (s)he received the following judicial documents from the following attorney(s) in the following manner:

Subpoena Duces Tecum (Civil)  
April 13, 1982  
Snelland Wilmer (Bischoff)  
11111 004

Documents Received  
Date Received  
Received From

That I personally served the same on those named hereafter at the time, place and in the manner indicated and/or pursuant to Rule 4d1, A.R.S. Rules of Civil Procedure, copy(ies) was/were left at the defendant(s) usual place of abode with a person of suitable age and discretion who resides therein at the defendant(s) usual place of abode.

If the named defendant(s) was/were named as a partner in a partnership he/she/they was/were served both individually and as a partner in said partnership.

That if the defendant(s) so named was/were a corporation, that the person served as stated below is an officer, general managing agent, director or statutory agent of said corporation(s).

UPON: PATRICIA LEE HOURIHAN, in person, by leaving one copy with her, while at 6413 South 26th Street, Phoenix, Arizona, on April 13, 1982, at the hour of 2:20 p.m., of said day.

Female, cau., 28 years, blonde hair, very bad acne, 5'4", 135 lbs.,

Set for April 19, 1982/9:00 A.M.

That service in each instance consisted of leaving with the party(s) named a true copy(ies) of the above described judicial document(s).

SUBSCRIBED AND SWORN TO BEFORE ME ON  
April 13, 1982

s/

Linda Sutton  
AFFIANT

s/ Gloria T. Galindo  
NOTARY PUBLIC

MY COMMISSION EXPIRES January 1, 1985

1	5.50	Service
9	11.25	Miles
		Miles
		Miles
	3.00	Notary Fee & Surcharge
		Fees Paid
	19.75	TOTAL

MICHAEL J. FLEMING  
PRIVATE PROCESS SERVICE

SATEWIDE SERVICE

P O BOX 3882

PHOENIX, ARIZONA 85030  
253 1155

P O BOX 50163  
TUCSON, ARIZONA 85703  
791 3443

P O BOX 449, MUNDY PARK  
FLAGSTAFF, ARIZONA 86017  
779 2943 - After Hours, 286-9157

P O BOX 2368  
PRESCOTT, ARIZONA 86302  
778 4812

P O BOX 1526  
FLORENCE, ARIZONA 85232  
868 4128