

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

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

APPLICATION FOR ISSUANCE OF SUBPOENA

Pursuant to Section 21720 of the Commission's regulations,  
Intervenor Patricia Lee Hourihan applies to the Atomic Safety  
and Licensing Board for the issuance of a Civil Subpoena to:

Edwin K. Swanson  
Director, Ambient Water Quality Unit  
Arizona Department of Health Services  
1740 West Adams  
Phoenix, Arizona 85007

for the purpose of requiring the ahovenamed individual to  
appear at the hearing scheduled to commence in this matter  
on June 22, 1982. A copy of the proposed Subpoena is  
attached.

Mr. Swanson, as Director of the Ambient Water Quality  
Unit has been designated to testify for the Department of  
Health Services about groundwater pollution, and the  
matters contained in his prefiled testimony. However,  
the Department has requested that this Board issue a subpoena  
for his appearance.

For this reason, Intervenor now applies for a subpoena to compel Mr. Swanson's appearance and testimony on the matters contained in Intervenor's prefiled testimony.

WHEREFORE Intervenor respectfully requests that the Chairman of the Licensing Board issue a Civil Subpoena in the form attached hereto directing Mr. Swanson to appear and give testimony when called by Intervenor, at the hearing beginning June 22, 1982.

Respectfully submitted,

*Lynne Bernabei / SQ*  
Lynne Bernabei  
Harmon & Weiss  
1725 I Street, N.W.  
Suite 506  
Washington, D.C. 20006  
(202) 833-9070

DATED: June 21, 1982

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NUCLEAR REGULATORY COMMISSION  
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_____	)	

SUBPOENA

THE NUCLEAR REGULATORY COMMISSION AND ROBERT M. LAZO, CHAIRMAN, ATOMIC SAFETY AND LICENSING BOARD, TO: Edwin K. Swanson, Director, Ambient Water Quality Unit, Arizona Department of Health Services, 1740 West Adams, Phoenix, Arizona 85007:

YOU ARE HEREBY COMMANDED to appear at the hearing to begin on June 22, 1982, at 9:30 a.m. at the Federal Building, 230 N. First Avenue, Phoenix, Arizona 85025, to testify in the abovcaptioned matter or behalf of Intervenor Patricia Lee Hourihan, and to attend the hearing until discharged.

You have been subpoenaed by Intervenor Patricia Lee Hourihan.

Pursuant to the Commission's regulations at 10 CFR §2.720(f), on motion made by you promptly, and in any event before 9:30 a.m., June 22, 1982, and on notice to attorney for Intervenor, 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 \_\_\_ day of June, 1982.

ATOMIC SAFETY AND LICENSING BOARD

BY: \_\_\_\_\_  
Robert M. Lazo, Chairman