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Ms. Elizabeth S. Bowers, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555


Re: In the Matter of Duke
Power Company (Perkins
Nuclear Station, Units
1, 2 and 3)

Dear Chairman Bowers:

I am enclosing with this letter the Request for Admissions and Request for Production of Documents and Interrogatories in regard to the above-entitled matter. Also, this letter is to state that intervenors have not had sufficient time to analyze the generic safety issues in detail but takes the position that additional discovery and hearings and the development of information on such a vital matter would be in the interest of the intervenors and the public and the applicant. The Staff's doubts about this record lead the intervenors to believe that the Staff's case on the generic safety issues is probably not adequate under the Appeal Board criterion.

Your attention is appreciated.

Very truly yours,


William G. Pfefferkorn

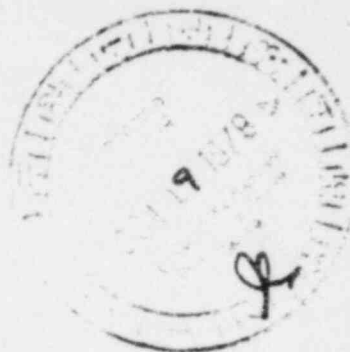
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Enclosure

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)	
)	
DUKE POWER COMPANY)	Docket Nos. STN 50-488
)	STN 50-489
(Perkins Nuclear Station)	STN 50-490
Units 1, 2 and 3))	

REQUEST FOR ADMISSIONS AND REQUEST
FOR PRODUCTION OF DOCUMENTS AND
INTERROGATORIES

NOW COME the intervenors and hereby make the following requests for admissions and production of documents and interrogatories:

1. Intervenors request applicant to admit, deny, partially admit or partially deny the following

a. That in the proceeding entitled Appalachian and Duke Company, et al. v. Russel Train, Administrator of EPA, 9 ERC 1045, decided in the Fourth Circuit Court of Appeals on July 16, 1976, that the plaintiffs in said action, which included applicant, alleged and argued to the Court that:

i. FWPCA's purpose is to protect the "integrity of the Nation's waters." Measures that waste water demonstrably defeat that objective. Accordingly, the Act's test obligates the Administrator to give "due regard" to steps "necessary to conserve" our waters for all beneficial uses and specifically to consider "effective utilization and conservation of fresh water" when evaluating methods for control