

ISHAM, LINCOLN & BEALE
COUNSELORS AT LAW

1120 CONNECTICUT AVENUE, N.W.
SUITE 325
WASHINGTON, D. C. 20006
TELEPHONE 202-833-9730

RELATED CORRESPONDENCE

DOCKET NUMBER
PROD. & UTIL. FAC.

50-155

September 10, 1980

CHICAGO OFFICE
ONE FIRST NATIONAL PLAZA
FORTY-SECOND FLOOR
CHICAGO, ILLINOIS 60603
TELEPHONE 312-558-7500
TELEX 2-5288



William S. Jordan, III, Esquire
Harmon & Weiss
1725 I Street, N.W.
Suite 506
Washington, D.C. 20006

Re: In the Matter of Consumers Power Company (Big Rock
Point Nuclear Power Plant) Docket No. 50-155

Dear Bill:

I am enclosing Consumers Power Company's response to Interrogatory 3-5 together with the documents indicated to be enclosed. This answer completes the Company's response to your First Set of Interrogatories. We are working to complete our response to your Second Set ASAP.

We have not answered the questions posed in paragraph (g) and the first sentence of paragraph (f). The first sentence of paragraph (f) asks for too much. A detailed description of the manufacturing process of each component of the fuel pool liner from the "raw materials to the completed product" seems to me to be oppressive. Moreover, I fail to see any materiality of the mining and milling processes for the stainless steel and other raw materials needed to fabricate the liner with the issues in this case. The same sort of comments are generally applicable to paragraph (g).

If I have misinterpreted the meaning of these paragraphs, or if you wish to be more specific, please call and we can discuss matters. However, I trust that the wealth of information provided with this response will satisfy your needs.

8009150 339

G

You requested in the interrogatories that we answer each question in four parts, the third of which was:

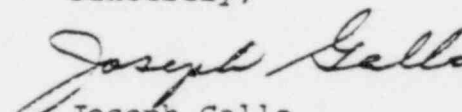
- C. Identify and provide all documents and studies, and the particular parts thereof, examined but not relied upon by the Licensee, which pertain to the subject matter in question.

We have interpreted this request as meaning those documents and studies examined by Licensee in preparing responses to these interrogatories. This interpretation is consistent with item B which requests that the studies and documents relied upon as a basis for the answer be identified and provided.

Please correct an error in our response to Interrogatory 3-6 which was sent to you on August 22, 1980. Page 41 of that submission states that three documents would be provided ASAP under separate cover. In fact, these documents were enclosed with the rest of the documents as a part of our response of August 22. I apologize for any inconvenience.

Please call if you have any questions.

Sincerely,


Joseph Gallo

JG/kar
Enclosures