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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	Docket No. 50-309-OLA
MAINE YANKEE ATOMIC POWER STATION,)	(To Increase and Modify
(Maine Yankee Atomic Power Company),)	Spent Fuel Pool Storage
Applicant.)	and Systems; Compaction)

SMP MOTION FOR MORE COMPLETE AND
MORE SPECIFIC DISCLOSURE BY APPLICANT

Pursuant to 10 CFR §2.730, Intervenor Sensible Maine Power, ("SMP"), moves this Board to order a more complete and more specific disclosure from Applicant upon its proposed d/r/c scheme.

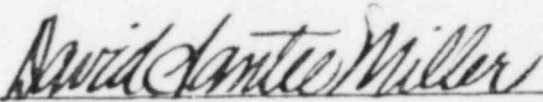
As grounds therefor SMP states:

1. As more particularly set forth below, nowhere in all its filings and submittals of the past three years has Applicant anywhere declared or described the means and methods by which it plans to pursue its proposed d/r/c scheme.
2. Such plain factual insufficiencies and omissions work several significant disadvantages upon these proceedings and all parties, including at least: (1) Unfairly burdening intervenors to "plead in a vacuum" relative to Applicant's proposed d/r/c scheme; (2) Working a denial of due process against intervenors on such basis; and (3) In all probability delaying and disrupting these proceedings by failing or refusing to disclose basic, necessary facts in a timely manner, requiring additional pleadings and amend-

ment of pleadings by intervenors, and further responsive pleadings by Applicant and Staff.

3. Thus the granting of this Motion would: (1) Protect the legal and due process rights of intervenors in and to a full, proper and timely disclosure of information upon Applicant's d/r/c scheme; (2) Promote and enhance the expeditious management and administrative efficiency of these proceedings; and (3) Promote and protect the recognized public interest of full, fair and open legal proceedings upon the truly unique and unprecedented application being pursued herein.

On the basis of the foregoing, for the reasons more particularly set forth below, and for such reasons as may be developed should oral argument be had in this matter, SMP respectfully urges that this Motion be granted.



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