

~~RELATED CORRESPONDENCE~~

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'82 SEP -1 A11:23

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	)	
	)	Docket Nos. 50-329-OM
CONSUMERS POWER COMPANY	)	50-330-OM
	)	50-329-OL
(Midland Plant Units 1 and 2)	)	50-330-OL

CONSUMERS POWER COMPANY'S FIRST  
SET OF INTERROGATORIES TO  
INTERVENOR BARBARA STAMIRIS

Pursuant to 10 CRF §2.740b and the Atomic Safety and Licensing Board's Prehearing Conference Order of August 14, 1982, Consumers Power Company ("Consumers Power") requests Intervenor Barbara Stamiris to answer separately and fully in writing under oath or affirmation, each of the following Interrogatories regarding contentions admitted at the pre-hearing conference, within 14 days of service.

INSTRUCTIONS AND DEFINITIONS

1. As used in these Interrogatories, whenever appropriate, the singular form of a word shall be interpreted as plural and the masculine gender shall be deemed to include the feminine.

2. As used in these Interrogatories, the term "and," as well as "or," shall be construed either disjunctively or conjunctively as necessary to bring within the

scope of these Interrogatories any information which might otherwise be construed to be outside their scope.

3. As used in these Interrogatories, the term "person" includes, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association, governmental body or agency.

4. As used in these Interrogatories, the term "identification" of a person or entity includes stating his, her, or its full name, his or her most recent home address and telephone number, his, her, or its most recent known business address and telephone number, his or her present position, and his, her, or its connection or association with any party to this proceeding.

5. If any of the information contained in the answers to these Interrogatories is not within the personal knowledge of the person signing the Interrogatory, so state and identify each person, document and communication on which he relies for the information contained in answers not solely based on his personal knowledge.

6. If you cannot answer any portion of the following Interrogatories in full, after exercising diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

7. If you claim privilege with respect to any information which is requested by these Interrogatories, specify the privilege claimed, the communication and/or answer as to which that claim is made, the parties to the communication, the topic discussed in the communication and the basis for your claim. . . .

#### INTERROGATORIES

1. With respect to each Contention advanced by Intervenor Barbara Stamiris which has been admitted by the Atomic Safety and Licensing Board in Prehearing Conference Order of August 14, 1982, in the above-captioned proceeding, subject to restatement, list the following:

- a. a concise statement of the facts supporting each Contention together with references to the specific sources and documents and portions thereof which have been or will be relied upon to establish such facts;
- b. the identity of each person expected to be called as a witness at the hearing;
- c. the subject matter on which each witness is expected to testify;
- d. the substance of each witness' testimony.

2. With respect to each witness identified in Intervenor's response to Interrogatory No. 1 above, identify each document which the witness will rely upon in whole or in part in the preparation of his testimony or in the development of his position.

3. With respect to each witness identified in

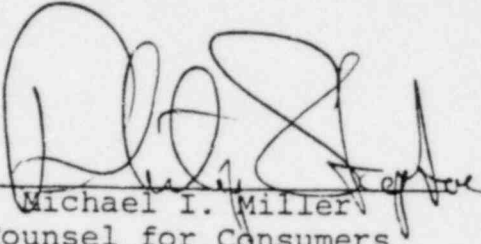
Intervenor's response to Interrogatory No. 1 above, identify the witness's qualifications to testify on the subject matter on which the witness will testify.

4. With respect to Contention 1.b., identify all inconsistencies and all reasons which Intervenor Stamaris believes support her contention that the NRC's economic cost benefit analysis underestimates decommissioning costs.

5. With respect to the first part of Intervenor's Contention 2 which the Licensing Board consolidated with Sinclair Contention 6, identify any and all examples of which Intervenor is aware, with the exceptions of Dartey and Howard, where Intervenor contends that disciplinary action resulted from QA/QC reporting. For each instance, identify the employee by name and address and state the date of the disciplinary action, the QA/QC problem which the employee sought to report, and the disciplinary action taken against the employee.

6. Identify all persons who participated in the preparation of the answers, or any portion thereof, to the Interrogatories.

We respectfully remind Intervenor Stamaris of her ongoing duty, under certain circumstances, to supplement responses to this discovery request in accordance with 10 C.F.R. §2.740(e).

  
~~Michael I. Miller~~ JMSM  
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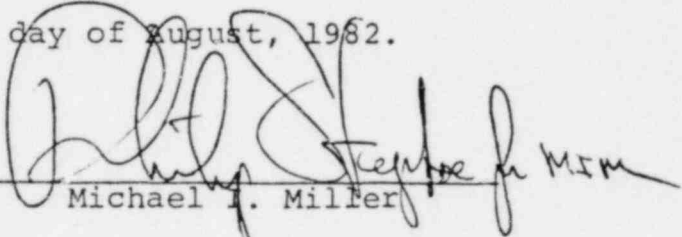
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CERTIFICATE OF SERVICE

I, Michael I. Miller, one of the attorneys for Consumers Power Company, hereby certify that a copy of "Consumers Power Company's First Set of Interrogatories to Intervenor Barbara Stamiris" was served upon all persons shown in the attached service list by deposit in the United States mail, first class, this 30th day of August, 1982.

  
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