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A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

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September 3, 1982

Peter Anderson
Wisconsin Environmental Decade, Inc.
114 North Carroll Street, Suite 208
Madison, Wisconsin 53703

Re: Wisconsin Electric Power Company
Point Beach Nuclear Plant, Units 1
and 2, Docket Nos. 50-266 and 50-301,
Operating License Amendment Proceeding

Dear Mr. Anderson:

This is to further clarify our agreement with respect to Licensee's July 22 discovery requests, which is generally commemorated in your August 16 letter to me. (Though your letter speaks only of "interrogatories," our August 16 agreement encompassed all of Licensee's July 22 discovery requests -- both interrogatories and requests for the production of documents.)

As you note in the last paragraph of your letter, Decade will respond to the July 22 discovery requests should it decide to attempt to offer into the record any information received from sleeving demonstration program workers after August 16, 1982. However, our August 16 agreement did not in any way modify the scope of the July 22 discovery requests. As we discussed in our August 16 telephone conversation, the July 22 discovery requests are not limited to "channel head workers," but rather extend to, e.g., all "persons on the list of sleeving demonstration program workers served on Decade by Licensee * * *." See Request For Production of Documents, No. 1. Thus, the revived discovery requests would not be limited to information received "from the channel head workers,"

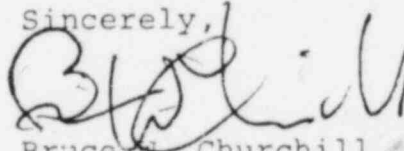
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Peter Anderson
September 3, 1982
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as the last sentence of your letter suggests. Similarly, pursuant to our agreement, Decade's response to revived discovery requests would not be limited to information received "as of this date [August 16, 1982]," as the last sentence of your letter suggests. Rather, should Decade decide to attempt to offer some of the subject information into the record, Decade would provide to Licensee all information responsive to the discovery requests, without regard to the date on which Decade acquired the information. As we discussed, Licensee would need all such information to enable it to place in context any information Decade might attempt to offer into the record.

Finally, Decade will immediately advise counsel for Licensee should Decade receive any subject information which it intends to attempt to offer into the record, to permit Licensee to promptly revive its discovery requests. However, as we discussed, Licensee does not by the August 16 agreement waive any arguments it may have with respect to Decade's timeliness in developing the subject information.

Sincerely,



Bruce W. Churchill
Delissa A. Ridgway

Counsel for Licensee

cc: Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
WISCONSIN ELECTRIC POWER COMPANY)	Docket Nos. 50-266
)	50-301
(Point Beach Nuclear Plant,)	(OL Amendment)
Units 1 and 2))	

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