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~~EXHIBIT 12/10/82~~
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OFFICE OF SECRETARY
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
PUGET SOUND POWER & LIGHT COMPANY,) Docket Nos. STN 50-522
et al.) STN 50-523
(Skagit/Hanford Nuclear Project)
_____) Date: September 1, 1982

APPLICANTS' FIRST SET OF INTERROGATORIES
TO THE COALITION FOR SAFE POWER

Applicants hereby serve their First Set of Interrogatories to the Coalition for Safe Power (CFSP) pursuant to 10 C.F.R. § 2.740b. Each interrogatory is to be answered fully in writing, under oath or affirmation, by an officer or agent of CPSP and is to include all pertinent information known to CPSP. Each answer should clearly indicate the interrogatory to which it is intended to be responsive.

Under NRC regulations (10 C.F.R. § 2.740(e)) parties are required to supplement responses to interrogatories under certain circumstances when new and/or different information becomes available. CFSP is obligated to comply with this requirement with respect to its answers to Applicants' First Set of Interrogatories.

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"CFSP" shall include all agents, employees, attorneys, investigators, and all other persons directly or indirectly subject to CFSP's control in any way. "You" and "yours" refers to CFSP.

"Documents" means all written or recorded material of any kind or character known to CFSP or in its possession, custody, or control, including, without limitation, letters, correspondence, telegrams, memoranda, notes, records, minutes, contracts, agreements, records or notation of telephone or personal conversations or conferences, inter-office communications, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, articles, treatises, teletype messages, invoices, tape recordings, computer printouts, and work-sheets.

When used with respect to a document, "identify" means, without limitation, to state its date, the type of document (e.g., letter, memorandum, telegram, chart, photograph, sound reproduction, etc.), the author and addressees, the present location and custodian, and a description of its contents.

When use with respect to a person, "identify" means, without limitation, to state his or her name, address and occupation.

If CFSP cannot answer any portion of any of the Interrogatories in full, after exercising due diligence to do so, so state, and answer to the extent possible, specifying the inability to answer the remainder and stating when CFSP expects to be able to answer the unanswered portions.

INTERROGATORIES

1. With respect to the CFSP contentions as phrased and admitted by the Licensing Board in its Memorandum and Order of July 6, 1982, in paragraphs III.1, 4, 14, 25, 26, 29, 30 and 35, identify all of CFSP's bases for each contention.

2. With respect to each basis identified in your answer to Interrogatory 1, state whether the basis is supported by:

- A. One or more documents.
- B. Any type of study, calculation, or analysis.
- C. Research.
- D. Conversations, consultations, correspondence, or any other type of communications with one or more individuals.

3. If your answer to Interrogatory 2 is one or more documents:

- A. Identify each such document.
- B. Identify the information in each document which supports the basis.
- C. Explain how such information provides support for the basis.

4. If your answer to Interrogatory 2 is any type of study, calculation, or analysis:

- A. Describe the nature of the study, calculation, or analysis and identify any documents which discuss or describe the study, calculation, or analysis.

B. When and where was the study, calculation or analysis performed?

C. Identify the person[s] who performed the study, calculation, or analysis.

D. Describe the results of each study, calculation, or analysis.

E. Explain how such study, calculation, or analysis provides support for the basis.

5. If your answer to Interrogatory 2 is research:

A. Describe all such research and indentify each document discussing or describing such research.

B. When and where was the research conducted?

C. Identify the person[s] who conducted the research.

D. Explain how such research provides support for the basis.

6. If your answer to Interrogatory 2 is conversations, consultations, correspondence, or any other type of communications with one or more individuals:

A. Identify each such individual.

B. State the educational and professional background of each such individual, including occupation and institutional affiliations.

C. Describe the nature of each communication with each such individual, when it occurred, and identify all other individuals involved.

D. Describe the information received from each such individual and explain how it provides support for the basis.

E. Identify each letter, memorandum, tape, note or other record related to each conversation, correspondence, or other communication with such individual.

7. Does CFSP intend to offer the testimony of any witnesses at the evidentiary hearings in this proceeding? If yes,

A. Identify each such witness.

B. State the educational and professional background of each such witness, including occupation and institutional affiliations.

C. Specify the subject matter, by contention and basis, upon which each such witness will testify.

8. Does CFSP intend to offer any documents for introduction into evidence at the evidentiary hearings in this proceeding? If yes,

A. Identify each such document.

B. Specify the subject matter, by contention and basis, to which each such document relates.

C. Identify the information in each such document which relates to the contention and basis.

D. Explain how the information identified in Interrogatory 8.C provides support for the contention and basis.

9. Does CFSP intend to offer any evidence in the evidentiary hearings in this proceeding which is not identified in your answer to Interrogatory 7.A or 8.A? If yes,

A. Identify the nature of each such evidence.

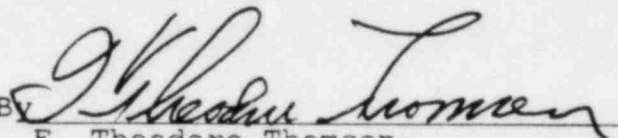
B. Specify the subject matter, by contention and basis, to which each such evidence relates.

C. Explain how such evidence provides support for the contention and basis.

DATED: September 1, 1982

Respectfully submitted,

PERKINS, COIE, STONE,
OLSEN & WILLIAMS


BY _____
F. Theodore Thomsen

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