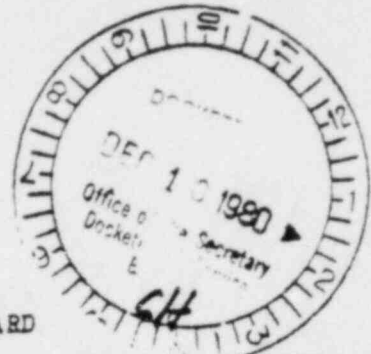


RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
CONSUMERS POWER COMPANY
(Midland Plant Units 1 & 2)



Docket Nos. 50-329 OM
50-330 OM
50-329 OL
50-330 OL

INTERVENOR REQUESTS OF CONSUMERS POWER COMPANY 12/4/80

INSTRUCTIONS AND DEFINITIONS

1. Information sought herein shall include information within the knowledge or control of any agents, employees, or independent contractors of Consumers Power Company.
2. Documents shall include reports, studies, notes, worksheets, meeting reports or summaries, correspondence, telecons, or other communications.
3. Soil settlement matters shall include all actions, plans, remediation, or issues related in any way directly or indirectly to soil settlement.

DOCUMENT REQUESTS

In accordance with 10 CFR 2.741 Intervenor Barbara Stamiris requests of Consumers Power Company the following documents:

1. MCAR 24 Interim Report 1 of 50-55e (Sept. 22 1978); that portion which was deleted at the time because it contained premature discussion of possible corrective action options.
2. Any cost or schedule impact data or projections made since those submitted in response to 50-54f questions 21 and 22 regarding soil settlement matters.
3. All discussions concerning and leading up to Consumer Power Company's decision to appeal the NRC requests for additional borings.

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4. Any discussions or considerations of possible lawsuits involving soil settlement matters.

5. Discussions of all options ever considered (whether formal or informal tentative or complete) for correction of the Administration Building settlement.

INTERROGATORIES

In accordance with 10 CFR 2740b Intervenor Barbara Stamiris serves the following interrogatories on Consumers Power Company:

1. a) What is the role of a consultant in soil settlement matters?
b) Who makes the final decisions on action responses? (Please include all levels of input in this decision making process.)
2. a) Did your consultants ever differ in their recommendations on soil settlement matters (including tentative stages) ?
b) If the answer to 2a is yes, what were these differences and how were they resolved?
3. a) What, if any, original recommendations of consultants (whether informal or formal, tentative or complete) were later changed or not followed?
b) Explain the reasons for such changes or departures (excepting the change from grouting to permanent dewatering).
c) What was the decision making process for each of such changes or departures?
4. a) Was ERC geotechnical staff input sought in any way prior to the decision to preload stated in the Nov. 7 1978 Bechtel-Consumers Power Company meeting (50-54f Vol.3 section 12) regarding soil settlement matters?
b) If the answer to 4a is yes, describe their input.

- c) If the answer to 4a is no, give the reasons for that decision and how that decision was made.
- d) Was such input(4a) ever suggested by anyone? If so, by whom was it made, when was it made, and how was it responded to?

PERTAINING TO DOCUMENT REQUESTS

In accordance with 10 CFR 2.741(e) I would ask that these documents be made available to me at my home with appropriate provisions, or that they be made available at Consumers Power Company Midland offices, with the provision that I be allowed to use the xerox machine there to copy documents for study at home. I would be happy to discuss any other possible arrangements.
(517-695-5604)

Respectfully Submitted,

Barbara Stamiris

Barbara Stamiris

5795 N. River

Freeland, Michigan 48623

Copies sent in accordance with

10 CFR 2.740b to:

Secretary US Nuclear Regulatory Commission

Atomic Safety and Licensing Board Chairman Beehoffer

Counsel for US Nuclear Regulatory Commission, Wm. Paton

Counsel for Consumers Power Company, Michael Miller, Isham Lincoln & Beale