

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)

DUKE POWER COMPANY, et al.)

(Catawba Nuclear Station,)
Units 1 and 2)

Docket Nos. 50-413
50-414

PALMETTO ALLIANCE MOTION TO REQUIRE
STAFF ANSWERS TO INTERROGATORIES

Pursuant to 10 CFR Section 2.720(h)(2)(ii), Intervenor Palmetto Alliance herewith files the attached Third Set of Interrogatories and Requests to Produce with the Licensing Board which are served on the Applicants and Commission Staff including the Executive Director for Operation.

Intervenor requests that the Commission Staff voluntarily answer the interrogatories and serve upon Intervenor copies of the documents of which production is sought.

If such voluntary responses by Staff are refused, Palmetto Alliance moves for an order directing the Staff to answer on the grounds that answers to these interrogatories are necessary to a proper decision in this proceeding and that, in some part not now fully known to Intervenor, answers to the interrogatories are not reasonably obtainable from any other source.

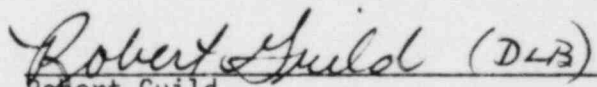
Palmetto Alliance further requests that the Board direct or "urge", as appropriate, the Staff to make "as much effort as possible...to assist the intervenors in obtaining the relevant information they seek to develop their positions to the fullest possible extent," as approved by the Appeal Board in Pennsylvania Power and Light Company, et al., (Susquehanna Steam Electric

Station, Units 1 and 2), ALAB-613, 12 NRC 317 at 336 (1980), to include such measures as "lending documents and transcripts to intervenor's representatives, giving them extra copies unneeded by staff, and setting up an additional local Public Document Room...where the...representatives reside - some 100 miles distant from the plant site." Id.

In support of this Motion and Request Palmetto Alliance asserts that it is a not-for-profit membership organization with extremely limited financial resources, that it cannot afford to purchase the transcript of this proceeding or to travel to the NRC Public Document Room in Washington, D.C., to inspect Commission documents, that its representatives reside and work some 75 miles from the facility, in Columbia, South Carolina and that inspection of documents and research in the local Public Document Room in Rock Hill presents a significant hardship on this Intervenor. Intervenor is informed that the only documents which will be available in the newly established "mini" document room in Columbia will be Applicant's FSAR, ER and Application.

WHEREFORE, Palmetto Alliance respectfully requests that the Staff voluntarily respond to this discovery or that the Board direct Staff response and urge assistance as herein described, and that the Board grant such further relief as is just and reasonable.

September 27, 1982


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