

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
LOUISIANA POWER & LIGHT CO. )  
(Waterford Steam Electric Station,) Docket 50-382  
Unit 3) )

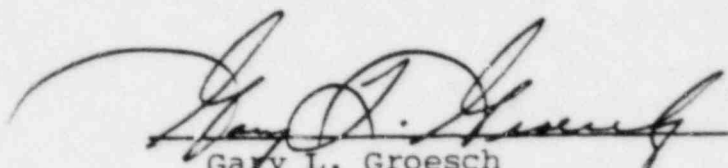
REQUEST FOR THE PRODUCTION AND COPYING OF DOCUMENTS

Now comes Joint Intervenors into court to request the following documents from Applicant, Staff, or FEMA:

- (1) all documents evaluating evacuation procedures or establishing schedules for such evaluation
- (2) all documents evaluating the siren warning system or establishing schedules for such evaluation
- (3) all documents pertaining to any and all teaching methods or sessions concerning evacuation procedures including names and curricula vita of those individuals doing the instruction.
- (4) all standard operating procedures and/or implementing procedures for removal of individuals during a nuclear accident including but not limited to the special categories of individuals named in Joint Intervenors contentions.
- (5) all documents relating to any agreements reached by Applicant with adjacent parishes for buses or other special vehicle transportation for categories of individuals named in Joint Intervenors contentions.
- (6) all documents relating to the installation or testing of communication equipment in the Waterford facility which would interface with any and all state or local agencies.
- (7) Joint Intervenors request any and all NRC documents relating to the Indian Point evacuation proceedings

With request #7 Joint Intervenors will show that a double standard is being applied to the Indian Point vis-a vis the Waterford 3 facility. The evacuation procedures around Indian Point are much stricter in protecting the citizens of New York and surrounding states than the same procedures protecting the citizens of Louisiana.

These documents should be delivered to the address of Joint Intervenors acting counsel within 15 days. Failure to receive these documents may prejudice Joint Intervenors in any subsequent proceedings.

A handwritten signature in cursive script, appearing to read "Gary L. Groesch". The signature is written in black ink and is positioned above the printed name.

Gary L. Groesch  
Joint Intervenors