

RELATED CORRESPONDENCE

DOCKETED

*82 001 19 P1:38

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • (517) 788-0550

TING & SERVICE

Dr Jerry Harbour Atomic Safety and Licensing Board Panel US Nuclear Regulatory Commission Washington DC 20555

Charles Bechhoefer, Esq Atomic Safety and Licensing Board Panel US Nuclear Regulatory Commission Washington DC 20555

Dr Fredrick P Cowan 6152 N Verde Trail, Apt Bl25 Boca Raton, Florida 33433

MIDLAND PROJECT MIDLAND DOCKET NO 50-329, 50-330
TESTIMONIES OF WC PARIS AND DR RD WOODS

Attached please find the testimony of William C Paris concerning the permanent dewatering system for the Midland site. Also attached is the testimony of Dr Richard D Woods concerning liquefaction potential at Midland.

The testimony of Dr Woods determines and describes areas of the site for which a dewatering system will operate to prevent possible lique-faction during a design basis safe shutdown earthquake. Mr Paris' testimony describes the design, construction, and operation of the system to dewater the areas identified in Dr Woods' testimony as potentially liquefiable.

Dr Woods has indicated that, because of the hospitalization of an associate, he will be available to testify only on Wednesday,

November 3, 1982, in the afternoon, and for a short time on the morning of Thursday, November 4, 1982. We request your consideration in trying to accommodate Dr Woods' schedule problems.

James E Brunner

Actorney for Consumers

Power Company

JEB/jsn

8210210481 821018 PDR ADOCK 05000329 T PDR D503

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

*82 OCT 19 P1:38

ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-329 OM In the Matter of 50-330 OM CONSUMERS POWER COMPANY Docket Nos. 50-329 OI 50-330 OL (Midland Plant, Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of the "Testimony of William C. Paris, Jr. on Behalf of the Applicant Regarding Permanent Dewatering System for the Midland Site" and "Testimony of Dr. Richard D. Woods on Behalf of the Applicant Regarding Liquefaction of Saturated Sand During an Earthquake at the Midland Site" in the abovecaptioned proceeding were served on the persons listed in the attached Service List either by deposit in the U.S. Mail, First Class, postage prepaid, or by Federal Express as indicated in the Service List, on the 18th day of October, 1982.

Rixford

Bechtel Associates Professional

Corporation

Sworn and Subscribed Before Me this 18 Day of October,

Washtenaw County, Michigan

My Commission Expires november 30, 1982

BEYERLY A. BROSS MOTARY PULL TO, WASSTERAY CO., MICH MI COPMISS ON FIREBES BOY. 30, 1982

OL-OM SERVICE LIST

Mr. Charles Bechhoefer, Esq.
Administrative Judge
Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

FEDERAL EXPRESS

Dr. Frederick P. Cowan Administrative Judge 6152 N. Verde Trail Apt. B-125 Boca Raton, FLA 33433

FEDERAL EXPRESS

Mr. Michael Miller, Esq. Isham, Lincoln & Beale 3 First National Plaza 52nd Floor Chicago, Ill. 60603 FEDERAL EXPRESS

Mr. D. F. Judd, Sr. Project Manager The Babcock & Wilcox Company P.O. Box 1260 Lynchburg, VA 24505

Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. William D. Paton, Esq. Counsel for NRC Staff U.S. Nuclear Regulatory Commission Washington, D. C. 20555 FEDERAL EXPRESS TO:
Maryland National Bank
Building
7735 Old Georgetown Road
Bethe da, Maryland
20814

Ms. Barbara Stamiris 5795 North River Road Route 3 Freeland, MI 48623 FEDERAL EXPRESS

Dr. Jerry Harbour U.S. Nuclear Regulatory Commission Atomic Safety and Licensing Board Panel Washington, D.C. 20555 FEDERAL EXPRESS

Mr. Frank J. Kelley, Esq. Attorney General of the State of Michigan

Mr. Stewart H. Freeman, Esq. Assistant Attorney General Environmental Protection Division 720 Law Building Lansing, Michigan 48913

Mr. Myron M. Cherry, Esq. One IBM Plaza Suite 4501 Chicago, IL 60611

Mr. Wendell H. Marshall RFD 10 Midland, Michigan 48640

Mr. John DeMeester Dow Chemical Building Michigan Division Midland, Michigan 48640

Ms. Mary Sinclair 5711 Summerset Street Midland, Michigan 48640

Mr. Steve Gadler 2120 Carter Avenue St. Paul, Minnesota 55108

Mr. Lee L. Bishop Harmon & Weiss 1725 "I" Street, NW #506 Washington, D. C. 20006

Mr. C. R. Stephens (3 copies)
Docketing and Service Section
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

FEDERAL EXPRESS

FEDERAL EXPRESS