NATURAL RESOURCES DEFENSE COUNCIL, INC.
AND THE SIERRA CLUB THIRD

REQUEST TO STAFF FOR

PRODUCTION OF DOCUMENTS

Pursuant to 10 CFR § 2.741, and in accordance with the Board's Scheduling Order of August 31, 1982, Intervenors, Natural Resources Defense Council, Inc. and the Sierra Club, request that Staff provide at the Commission's office at 1717 "H" Street, N.W., Washington, D. C. copies of the following documents.

REQUEST FOR PRODUCTION OF DOCUMENTS

- 1. Croff, A. G. et al. 1980. ORIGEN2 A Revised and Updated

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- 2. U.S. Department of Energy (DOE). 1980a. Environmental
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 Hanford Site, Richland, Washington. DOE/EA-0116,
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- 3. U.S. Department of Energy (DOE). 1981a. Conceptual Design Report, Hot Experimental Facility. ORNL/CFRP-81/4, Washington, D. C.
- 4. U.S. Department of Energy (DOE). 1981b. FMEF Environmental
 Assessment Supplement for Secure Automated Fabrication (SAF).
 Washington, D. C.
- 5. U.S. Energy Research and Development Administration, Richland Operations Office (ERDA/RL). 1976. Mechanical Standard, High Efficiency Particulate Air Filters. HPS-151-M, Richland, Washington.
- 6. U.S. Nuclear Regulatory Commission (NRC). 1976b. <u>Draft</u>
 Supplement 1 to the Final Environmental Statement on Barnwell
 Nuclear Fuel Plant. NUREG-0082. Washington, D. C.
- 7. U.S. Nuclear Regulatory Commission (NRC). 1981b. Environmental Impact Appraisal of the Exxon Nuclear Company Nuclear Fuel Fabrication Plant. Docket No. 70-1257, Washington, D. C.
- 8. U.S. Nuclear Regulatory Commission (NRC). 1982a. An ORIGEN2
 Model and Results for the Clinch River Breeder Reactor.
 A. G. Croff and M.A. Bjerke. NUREG/CR-2762 (ORNL/NUREG-5884),
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- 9. U.S. Nuclear Regulatory Commission (NRC). 1982b. Environmental Impact Appraisal of the General Electric Nuclear Facility Nuclear Fuel Fabrication Plant, Wilmington, North Carolina. Docket No. 70-1113, Washington, D. C.
- 10. Comptroller General of the U.S., "Report to Congress," EMD-81-106, August 26, 1981.
- 11. Institute of Electrical and Electronic Engineers, Standard 279.
- 12. ---, NUREG-0440, Liquid Pathway Generic Study," February 1978.

- 13. Eastern Idaho Council on Industry and Energy, "The Idaho National Engineering Laboratory as a Site for a Large LMFBR," January, 1981.
- 14. ---, "Piqua Decommissioning Report," report prepared for AEC, AI/AEC 12832, January 1970.
- 15. ---, "Retirement of the Hallam Nuclear Power Facility, report prepared for AEC, AI/AEC 12709, May 15, 1970.
- 16. Exxon Nuclear Company, Inc., "Nuclear Fuel Recovery and Recycling Center Environmental Report," Vols I and II, USNRC Docket No. 50-564, December 16, 1976.
- 17. McClure, J.D., "The Probability of Spent Fuel Transportation Accidents," Sandia National Laboratories, SAND 80-1721, 1982.
- 18. Power Reactor Development Co., "Retirement of the Enrico Fermi Atomic Power Plant," report prepared for DOE, Supplement 1, October 1975.
- 19. ---, "LMFBR Conceptual Design Study, Final Report, Preliminary Environmental Review Summary," CDS-400-10, March 1981.
- 20. ---, "LMFBR Conceptual Design Study, Final Report, Site Evaluation Report," CDS-400-91, March 1981.
- 21. ---, NUREG-0255, "Underground Siting of Nuclear Power Plants,"
 August 1977.
- 22. ---, NUREG-0414, "Safeguarding Domestic Mixed Oxide Industry Against Hypothetical Subnational Adversary," May 1978.
- 23. ---, NUREG-0703, "Potential Threat to Licensed Nuclear Activities," July 1980.
- 24. ---, NUREG/CR-0130, "Technology, Safety, and Costs of Decommissioning a Reference PWR Power Station," June 1978; Addendum, August 1979.
- 25. U.S. Department of Energy (DOE). 1979-81. DOE Order 5630,
 Part 1 through 7, Office of Safeguards and Security,
 Washington, D. C.
- 26. U.S. Department of Energy (DOE) Orders 5631 and 5632.
- 27. U.S. Department of Energy (DOE) IMD 6102.
- 28. U.S. Department of Energy (DOE) Requirements for the Physical Protection of Highway Shipment of Irradiated Reactor Fuel.

- 29. McSweeney, T.I. et al, "Improved Material Accounting for Plutonium Processing Facilities and a V-235-HTGR Feed Fabrication Facility," BNWL-2098, 1975.
- 30. Ellis, J.H., "Development and Testing of a Near-Real-Time Accounting System for the Barnwell Reprocessing Facility,"

 Jour. INMM x, Proceedings Issue, 1981.
- 31. U.S. Department of Energy (DOE) Special Study, Report on Reactor Materials and Nuclear Explosives (DOE-DP-003).
- 32. U.S. Department of Energy (DOE) 1976 Threat Guidance.
- 33. Generic Adversary Characteristics Summary Report (NUREG-0459).
- 34. Insiders Study (NUREG-0703).
- 35. Risk Assessment Review Group Report. (NUREG/CR-0400, September 1978).
- 36. U.S. Nuclear Regulatory Commission (NRC) Annual Safeguards Report to Congress. FY 1981 and FY 1982.
- 37. Keisch and Fainberg, Differences in DOE and NRC Safeguards and Security Requirements and Their Potential Importance on Comparability of DOE and NRC Systems, March, 1981.
- 38. U.S. Nuclear Regulatory Commission (NRC) Security Agency Study (NURRG-0015).
- 39. Safeguards Summary Event List NUREG-0525 (Current).
- 40. U.S. General Accounting Office, Report concerning serious security problems at DOE nuclear weapons facilities. (cited in Washington Post, September 17, 1982, at Al, Al0).

Respectfully submitted,

Barbara A. Finamore

S. Jacob Scherr

1725 I Street, N.W., Suite 600

Washington, D. C. 20006

(202) 223-8210

Ellen R. Wess (BAF)

Harmon & Weiss

1725 I Street, N.W.

Washington, D. C. 20006

(202) 833-9070

Attorneys for Intervenors Natural Resources Defense Council, Inc. and Sierra Club

Dated: September 17, 1982

CERTIFICATE OF SERVICE

I hereby certify that copies of NATURAL RESOURCES DEPENSENG & SERVICE COUNCIL, INC., AND THE SIERRA CLUB TWENTY-SEVENTH SET OF INTERROGATORIES AND REQUEST TO PRODUCE TO STAFF and THIRD REQUEST TO STAFF FOR PRODUCTION OF DOCUMENTS were served by hand this 17th day of September 1982 upon:

Marshall E. Miller, Esq.
Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
4350 East West Highway, 4th floor
Bethesda, MD 20814

Gustave A. Linenberger Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission 4350 East West Highway, 4th floor Bethesda, MD 20814

Daniel Swanson, Esq.
Stuart Treby, Esq.
Bradley W. Jones, Esq.
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Maryland National Bank Building
7735 Old Georgetown Road
Bethesda, MD 20814

Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission 1717 H Street, NW, Room 1121 Washington, D.C. 20555

Atomic Safety & Licensing Board Panel U.S. Nuclear Regulatory Commission 1717 H Street, NW, Room 1121 Washington, D.C. 20555

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
1717 H Street, NW, Room 1121
Washington, D.C. 20555 (3 copies)

R. Tenney Johnson, Esq.
Leon Silverstrom, Esq.
Warren E. Bergholz, Jr., Esq.
Michael D. Oldak, Esq.
L. Dow Davis, Esq.
Office of General Counsel
U.S. Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

George L. Edgar, Esq.
Irvin N. Shapell, Esq.
Thomas A. Schmutz, Esq.
Gregg A. Day, Esq.
Frank K. Peterson, Esq.
Morgan, Lewis & Bockius
1800 M Street, NW
Washington, D.C. 20036

and by first class mail upon:

Dr. Cadet H. Hand, Jr., Director Bodega Marine Laboratory University of California P.O. Box 247 Bodega Bay, CA 94923

Herbert S. Sanger, Jr., Esq.
Lewis E. Wallace, Esq.
James F. Burger, Esq.
W. Walker LaRoche, Esq.
Edward J. Vigluicci, Esq.
Office of the General Counsel
Tennessee Valley Authority
400 Commerce Avenue
Knoxville, TN 37902

William M. Leech, Jr., Esq.,
Attorney General
William B. Hubbard, Esq.,
Chief Deputy Attorney General
Michael D. Pearigen, Esq.
State of Tennessee
Office of the Attorney General
450 James Robertson Parkway
Nashville, TN 37219

Lawson McGhee Public Library 500 West Church Street Knoxville, TN 37219 William E. Lantrip, Esq. City Attorney Municipal Building P.O. Box 1 Oak Ridge, TN 37830

Oak Ridge Public Library Civic Center Oak Ridge, TN 37820

Joe H. Walker 401 Roane Street Harriman, TN 37748

Commissioner James Cotham
Tennessee Department of Economic and
Community Development
Andrew Jackson Building, Suite 1007
Nashville, TN 32219

Barbara A. Finamore