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10/22/82

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'82 OCT 22 A10:36

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
REGULATORY & SERVICE  
BRANCH

In the Matter of )  
 )  
DUKE POWER COMPANY, et al. )  
 )  
(Catawba Nuclear Station, )  
Units 1 and 2) )

Docket Nos. 50-413  
50-414

APPLICANTS' MOTION FOR PROTECTIVE ORDER

Duke Power Company, et al. (Applicants), pursuant to 10 CFR 2.740(c), request the Atomic Safety and Licensing Board to issue an order to protect Applicants from being required to respond further to "Palmetto Alliance Third Set of Interrogatories and Requests to Produce," filed September 27, 1982.

Applicants have responded to Palmetto Alliance's Interrogatories by providing all information, not otherwise privileged, relevant to the subject matter of Palmetto Alliance's Contention No. 16. Palmetto Alliance's Interrogatories, however, are overly broad and seek, in numerous instances, information which either is privileged or is not relevant to the subject matter of the contentions. Applicants have set out in their Response to Palmetto Alliance's Interrogatories their objections to specific interrogatories and the grounds therefor, and incorporate such herein by reference.

On the grounds set forth in their objections, Applicants move this Licensing Board to issue an order which will protect them from being required to provide information in response

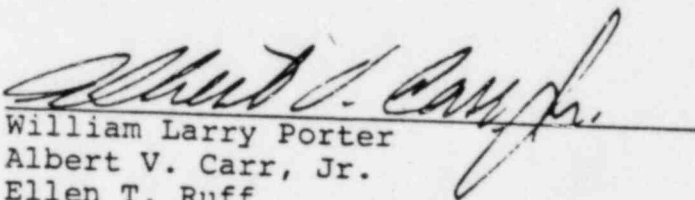
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to Palmetto Alliance's Interrogatories beyond that already furnished. For Applicants to provide such information would require them to divulge information which either is privileged or is not relevant to the subject matter of the contention. In any case, to produce such information would subject Applicants to annoyance, embarrassment, oppression, undue burden or expense.

Therefore, for the reasons set forth above, Applicants request this Licensing Board to issue an order which protects Applicants from providing any information beyond that already provided in "Applicants' Responses to 'Palmetto Alliance Third Set of Interrogatories and Requests to Produce.'"

Respectfully submitted,



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October 19, 1982

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '82 OCT 22 A10:36

OFFICE OF SECRETARY  
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In the Matter of )  
DUKE POWER COMPANY, et al. )  
(Catawba Nuclear Station, )  
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CERTIFICATE OF SERVICE

I hereby certify that copies of Applicants' Responses to "Palmetto Alliance Third Set of Interrogatories and Requests to Produce" and "Applicants' Motion for Protective Order" in the above-captioned matter, have been served upon the following by deposit in the United States mail this 19th day of October, 1982.

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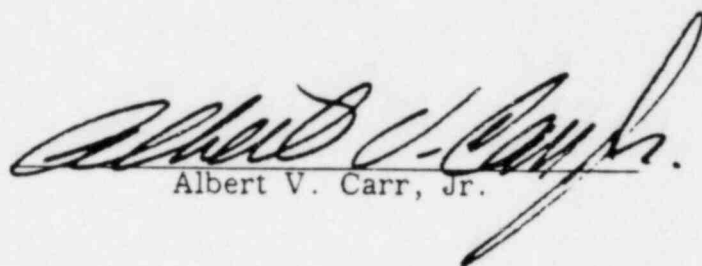
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