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March 22, 1983

Ms. Barbara Stamiris
5794 North River
Route 3
Freeland, Michigan 48623

DOCKET NUMBER
PROD. & UTIL. FAC.

50-329/380
04/02

Ms. Mary Sinclair
5711 Summerset Street
Midland, Michigan 48640

Dear Ms. Stamiris & Ms. Sinclair:

The purpose of this letter is to summarize our meeting during a recess in the hearings on March 9, 1983, subsequent telephone conversations, and your letters regarding your requests for informal discovery on matters to be covered in the April hearings. The scope of the requests set forth in this letter will govern Consumers Power Company's response to your request.

The scope of documents which Ms. Sinclair requests to have produced via the informal discovery process is:

key documents (if any), including correspondence, communications, memoranda or minutes of meetings, created during the time period from mid-October through December, 1982, leading up to the decision in early December to stop work on the plant, which documents would set forth reasons for the decision to halt construction on certain parts of the plant and lay off a number of workers.

No agreement was reached which would preclude further discovery requests or follow up requests.

Ms. Stamiris requests background documents relating to the Construction Completion Program (CCP), the Independent Audit Reviews and the Quality Improvement Program. With respect to the Construction Completion Program (CCP), Ms. Stamiris requests:

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1. Consumers Power Company's internal meeting notes or meeting summaries.
2. Bechtel internal meeting notes or meeting summaries.
3. Internal documents, including drafts, regarding the procedural implementation, scope and purpose of the CCP as it developed prior to December 2, 1982.
4. Meeting notes or other documents relating to the presentation of the CCP Plan to the NRC Staff and relating to preparation for such presentations, including but not limited to copies of slides for such presentations.
5. Internal documents regarding implementation, scope and purpose of the CCP as it has evolved since December 2, 1982.

With respect to the Independent Audit Reviews, Ms. Stamiris requests:

All documents relating to independent audit reviews containing information on (1) scope of work, (2) criteria by which independent reviewers are selected, (3) criteria for performance of work, or (4) criteria for reporting of reviews.

In the initial discussion, Ms. Stamiris tentatively agreed with the Company's proposal that the foregoing requests should be contrued not to require divulging portions of contracts setting forth proprietary or purely commercial information. However, in a later discussion, she stated her view that such matters would be covered by her already existing stipulation regarding proprietary matters. The Company agreed to review that stipulation to ascertain whether it agreed with Ms. Stamiris as to the coverage of that stipulation. That review is underway.

With respect to the INPO evaluation, Ms. Stamiris requests:

A copy of the evaluation report and all preliminary internal reports or documents presented to Consumers Power Company in connection with the INPO review.

With respect to the Quality Improvement Program Ms. Stamiris requests:

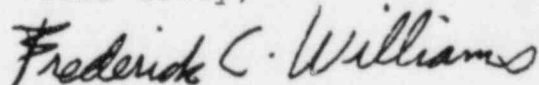
All documents which include answers to when, how, by whom, and for what purpose the QIP was instituted and implemented.

For this category of documents, an interrogatory-type answer would be acceptable to the extent that such questions are not answered by existing documents.

Ms. Stamiris indicated that her agreement to the text of the foregoing requests was not to be construed as an agreement precluding her from making further requests on other subjects such as the diesel generator building inspection and the Company's response thereto.

In response to the request for these categories of information, I indicated that Consumers Power Company would make a search of the files to determine what documents do in fact exist, would determine which documents the Company would be willing to provide, and would respond with a decision as to what documents Consumers would make available promptly and in any event not later than the date of resumption of the hearings, March 29, 1983.

Yours truly,

A handwritten signature in cursive script that reads "Frederick C. Williams".

Frederick C. Williams

FCW/tjh

cc: Service List