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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
NRC

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
ARIZONA PUBLIC SERVICE )  
COMPANY, ET AL. )  
(Palo Verde Nuclear Generating )  
Station, Units 2 and 3) )

Docket Nos. STN 50-529  
STN 50-530

NRC STAFF'S THIRD SET OF INTERROGATORIES TO  
WEST VALLEY AGRICULTURAL PROTECTION COUNCIL, INC.

In accordance with 10 C.F.R. Sections 2.740, 2.740b and 2.741, the Staff hereby serves West Valley Agricultural Protection Council, Inc., (West Valley) with Staff's Third Set of Interrogatories.

INSTRUCTIONS

1. Each interrogatory shall be answered separately and fully in writing under oath or affirmation, and shall include all pertinent information available to West Valley, its officers, directors, members, employees, advisors, or counsel.

2. Give the name, address, occupation and employer of the person or persons answering each interrogatory and identify the portions of each interrogatory he answers.

3. As used herein the term "documents" shall mean all writings and records of every type in the possession, control or custody of West Valley, its directors, attorneys, members, employees or agents,

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including, but not limited to, memoranda, correspondence, reports, surveys, evaluations, charts, books, minutes, notes, agenda, diaries, logs, transcripts, microfilm, accounting statements, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical or otherwise. "Documents" shall also mean copies of documents, even though the originals are not in the possession, custody or control of West Valley, its members, or consultants.

4. For all references to documents requested in these interrogatories, identify such documents by author, title, date of publication and publisher if the reference is published; and if it is not published, identify the document by the author, title, the date it was written, the qualification of the author relevant to this proceeding, and where a copy of the document may be obtained.

5. In your answer, rep at each interrogatory set forth herein and then set forth an answer thereto separately and fully. As to any interrogatory, section or subsection of said interrogatory that you refuse to answer or which is objected to for any reasons, separately state the grounds for any such refusal. Where a complete answer to a particular interrogatory, section or subsection of said interrogatory is not possible, such interrogatory, section or subsection of said interrogatory should be answered to the extent possible and a statement made indicating the reason for the partial answer.

6. If the answer to any interrogatory is based upon conversations, consultations, correspondence or any other type of communications with one or more individuals (a) identify each such individual by name and address, (b) state the educational and profes-

sional background of each such individual, (c) describe the information received from such individual and its relation to your direct answer, (d) identify each writing or record related to each such conversation, consultation, correspondence or other communication with such individual.

7. If differing or supplemental information or documents are later obtained by West Valley after answering these interrogatories, these interrogatory responses should be updated and the new information or documents promptly supplied.

#### INTERROGATORIES

##### INTERROGATORY 1

Identify all documents that West Valley intends to use to support its remaining contentions in this proceeding and that may be offered as exhibits or referred to during cross examination.

##### INTERROGATORY 2

a) Identify all persons West Valley intends to call as a witness in this proceeding and fully describe the subject matter of his testimony and the factual basis thereof.

b) Provide the address and education and professional qualifications of any persons named in response to interrogatory 2(a).

INTERROGATORY 3

a) List any crops which West Valley contends should have been, but has failed to be, included in the August 1984 study prepared by the University of Arizona entitled "An Assessment of Salt Drift on the Productivity of Agricultural Crops in the Vicinity of the Palo Verde Nuclear Generating Station" (hereinafter referred to as University of Arizona Study).

b) Provide West Valley's basis for contending that these additional crops, identified in response to interrogatory 3(a) above, should have been included in the University of Arizona Study.

c) State whether these additional crops have been grown in the past within a ten mile radius of the Palo Verde facility. For each crop grown within a ten mile radius, identify: (1) each year it was grown; (2) the approximate location where it was grown during each of these years; and (3) the number of acres that was grown for this crop for each of these years.

INTERROGATORY 4

List all conclusions in the University of Arizona Study with which West Valley disagrees, and fully set out the basis of West Valley's disagreement.

INTERROGATORY 5

In view of the University of Arizona Study's conclusions, fully set out any corrective action west Valley contends should be taken to alleviate the effects of salt deposition caused by the Palo Verde nuclear facility.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of )  
ARIZONA PUBLIC SERVICE ) Docket Nos. STN 50-529  
COMPANY, ET AL. ) STN 50-530  
(Palo Verde Nuclear Generating )  
Station, Units 2 and 3) )

CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF'S THIRD SET OF INTERROGATORIES TO WEST VALLEY AGRICULTURAL PROTECTION COUNCIL, INC. in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 26th day of October, 1984:

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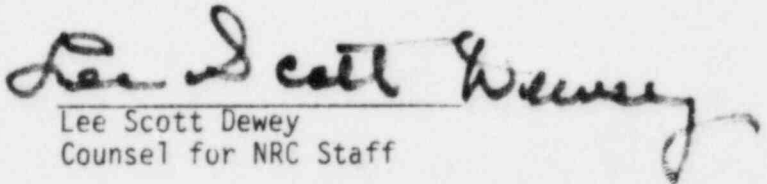
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