

MEREDITH & COHEN, P. C.

ATTORNEYS AT LAW

22ND FLOOR-ARCHITECTS BUILDING
17TH & SANSOM STREETS
PHILADELPHIA, PA. 19103

(215) 564-5182
TELECOPIER (215) 569-0958

SUITE 300
101 TREMONT STREET
BOSTON, MA. 02108
(617) 451-0793

JOEL C. MEREDITH
BRUCE K. COHEN
STEVEN J. GREENFOGEL
*ALSO MEMBER MASS. BAR

July 20, 1984

J.M. Felton, Director
Division of Rules and Records
United States Nuclear
Regulatory Commission
Washington, DC 20555

FREEDOM OF INFORMATION
ACT REQUEST

FOIA-84-603
Rec'd 7-23-84

Re: Freedom of Information Act Request

Dear Mr. Felton:

Pursuant to 5 U.S.C. Section 552, we hereby request, on behalf of all plaintiffs in In Re Washington Public Power Supply System Securities Litigation (MDL No. 551, W.D.Wa.), an opportunity to inspect and/or copy records within your possession, custody or control, including without limitation, all documents, handwritten notes or typed memoranda which refer, relate to or incorporate the following:

- (1) Applications for Limited Work Authorizations by the Washington Public Power Supply System (hereinafter "the System") for its Project Numbers 1, 2, 3, 4 and/or 5.
- (2) Applications for Construction Permits by the System for its Project Numbers 1, 2, 3, 4 and/or 5.
- (3) Applications for extensions of the completion date of a Construction Permit by the System for its Project Numbers 1, 2, 3, 4 and/or 5.
- (4) Applications for a license by the System for its Project Numbers 1, 2, 3, 4 and/or 5.
- (5) To the extent not requested in sub-paragraphs 1-4 hereof, applications by the System for any other type of authorization, permit or license pursuant to 42 U.S.C. Sections 2232 or 2235.

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- (6) Communications between you or your personnel on the one hand and the System or those speaking on its behalf, (including but not limited to, attorneys, engineering, contracting and consulting firms), concerning adequacy and safety of design, engineering and/or construction of the System's Project Numbers 1, 2, 3, 4 and/or 5.
- (7) Communications between you or your personnel on the one hand and the System or those speaking on its behalf, (including but not limited to, attorneys, engineering, contracting and consulting firms), concerning changes in Nuclear Regulatory Commission rules, regulations or requirements.
- (8) All documents relied on or considered or filed of record in connection with any decision of the Nuclear Regulatory Commission, its Boards, Panels or other divisions of any type, (including but not limited to the Atomic Safety and Licensing Board and the Atomic Safety and Licensing Appeal Board), relating to the System's Project Numbers 1, 2, 3, 4 and/or 5.
- (9) Transcripts of any hearings held pursuant to 42 U.S.C. Section 2239 in connection with the System's Project Numbers 1, 2, 3, 4 and/or 5.
- (10) The ability of the System to finance its Project Numbers 1, 2, 3, 4 and/or 5.
- (11) The ability, willingness and/or authority of the Participants to have entered into and/or comply with the terms of the Participants Agreement providing security for the System's Project Numbers 4 and 5 Bonds.
- (12) The need for the System's Project Numbers 4 and 5, including consideration of any alternatives to their construction.

Pursuant to 5 U.S.C. Section 552(a)(6)(A), we hereby request that the NRC respond in writing to this request within ten (10) days after its receipt. We further request that, if you deny any portion of this request, you provide a detailed

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statement of the reasons for such denial and a description of all documents or portions of documents withheld.

The undersigned and other plaintiffs' counsel will be available to inspect and copy these documents promptly upon their production and will pay any reasonable costs associated therewith. Your attention to this request would be greatly appreciated.

Sincerely,

MEREDITH & COHEN, P.C.


By: Bruce K. Cohen

BKC/jr

cc: Paul M. Bernstein, Esquire
Melvyn I. Weiss, Esquire
James R. Irwin, Esquire
Michael Mines, Esquire
David Berger, Esquire
Mark C. Rutzick, Esquire
All Defendants' Lead and
Liaison Counsel