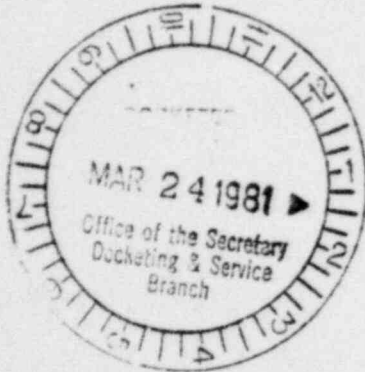


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March 20, 1981



William D. Paton, Esq.
Counsel for the NRC Staff
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Bill:

We have reviewed the NRC Staff's Answers to Interrogatories filed by Consumers Power Company. As you know, we have filed a motion to compel regarding the interrogatories the NRC Staff has refused to answer. We understand that the Staff is preparing a response to that motion and that the response will be filed April 1st, the day before the prehearing conference.

Our review of the Staff's answers reveals several answers that require clarification and/or additional response from the Staff. Rather than filing a motion or follow-up interrogatories with regard to those items, we have herewith set forth our concerns and request that you give us your response prior to the April 2nd prehearing conference.

Our first concern is the use of the word "primarily" at page 9, and "essentially" at pages 35, 38 and 42 of your answer. These words qualify the answers so as to not make them fully responsive to our interrogatories. We request an explanation of the degree of qualification and revision of the answers so that they are in fact responsive.

We note that the answer to interrogatory 11 states that because the Staff has not completed its review of information submitted by Consumers Power that it cannot answer the interrogatory. We request an answer to the interrogatory as soon as the review is completed, in any event, within a reasonable time prior to May 18th.

We also note that Table 8-1 contains responses for 50.54(f) requests 39-53 that state that the Staff's consideration of response adequacy is under review and that the necessity for Staff follow-up requests or communications to Consumers

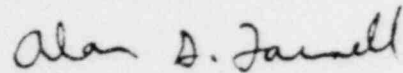
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Power has not been determined yet. We request that Table 8-1 and the other portions of the answer to interrogatory 8 be updated as soon as the review is completed, in any event, within a reasonable time prior to May 18th. We also request that you provide us with the same information with regard to our answers to your interrogatories.

Please call me if you have any questions. Otherwise, I shall expect your timely response.

Sincerely,



Alan S. Farnell

ASF:jp

cc: Midland OM/OL Service List