

~~EXHIBIT DUE EXPONENCY~~

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY
AND LICENSING BOARD

In the Matter of)
)
WASHINGTON PUBLIC POWER)
SUPPLY SYSTEM) Docket No. 50-460-CPA
)
(WPPSS Nuclear Project No. 1))

LICENSEE'S FIRST SET OF
INTERROGATORIES AND REQUESTS
TO PRODUCE TO INTERVENOR

Pursuant to 10 C.F.R. §§2.740b and 2.741, the Washington Public Power Supply System (Licensee) hereby serves Applicant's First Set of Interrogatories and Requests to produce upon the Coalition for Safe Power (intervenor).

Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to intervenor, its officers, directors or members as well as any pertinent information known to its employees, advisors, representatives or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of intervenor, its officers, directors or members as well as its employees, advisors, representatives or counsel. In answering each interrogatory and in responding to each request,

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recite the interrogatory or request preceding each answer or response. Also, identify the person providing each answer or response.

These interrogatories and requests shall be continuing in nature. Thus, any time intervenor obtains information which renders any previous response incorrect or indicates that a response was incorrect when made, intervenor should supplement its previous response to the appropriate interrogatory or request to produce. Intervenor should also supplement its response as necessary with respect to identification of each person expected to be called at the hearing as a witness, the subject matter of his or her testimony and the substance of that testimony. Licensee is particularly interested in the names and areas of expertise of intervenor witnesses, if any. Identification of such witnesses is necessary if Licensee is to be afforded adequate time to depose them. The term "documents" shall include any writings, drawings, graphs, charts, photographs and other data compilations from which information can be obtained. Licensee requests that at a date or dates to be agreed upon, intervenor make available for inspection and copying all documents subject to the requests set forth below.

REQUESTS FOR DOCUMENTS

Pursuant to 10 C.F.R. §2.741, Licensee requests intervenor by and through its representative or attorney to make available for inspection and copying at a time and location to be designated, any and all documents identified in the responses to the Licensee's interrogatories below including, but not limited to:

- (1) any written record of any oral communication between or among intervenor, its advisors, consultants, representative, and/or any other persons, including but not limited to the NRC Staff, the Licensee, and their advisors, consultants, agents, and/or any other persons; and
- (2) any documents, correspondence, letters, memoranda, notes, diagrams, reports, charts, photographs, or any other writing, including but not limited to work papers, prior drafts, and notes of meetings.

If intervenor maintains that some documents should not be made available for inspection, it should specify the documents and explain why such are not being made available. This requirement extends to any such documents, described above, in the possession of intervenor, its advisors, consultants, representatives, or attorney.

INTERROGATORIES

Pursuant to 10 C.F.R. §2.740b, the Licensee requests intervenor by and through its representative or attorney to answer separately and fully in writing, under oath or affirmation, by persons having knowledge of the information requested, the following interrogatories.

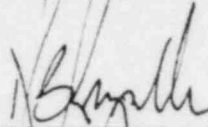
1. State the full name, address, occupation and employer of each person answering the interrogatories and designate the interrogatory or the part thereof he or she answered.
2. Identify each and every person you are considering calling as a witness in the event a hearing is held in this proceeding and with respect to each of these witnesses:
 - a. State the substance of the facts and opinions to which the witness is expected to testify;
 - b. Give a summary of the grounds for each opinion; and
 - c. Describe the witness's educational and professional background.
3. Is your contention based upon conversations, consultations, correspondence or any other type of communications with one or more individuals? If so,
 - a. Identify by name and address each of these individuals.
 - b. State the educational and professional background of each of these individuals, when each communication occurred, and identify all other individuals involved.
 - c. Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.
 - d. Describe the information received from such individuals and explain how it provides a basis for your contention.

- e. Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence or other communication with such individual.
4. Please identify and provide a copy of the current charter, bylaws, articles of incorporation and/or all other organic documents pursuant to which intervenor is organized.
 5. Have the documents identified and provided in interrogatory 4 amended and/or superceded any earlier charters, bylaws, articles of incorporation and/or organic documents pursuant to which intervenor was organized? If so:
 - a. Identify and provide each of these amended and superceded documents.
 - b. Explain why these documents were amended and/or superceded.
 - c. Identify and provide all documents in which the actions explained in interrogatory 5(b) are discussed.
 6. Explain the organizational goals of intervenor.
 7. What is the complete basis for your statement that Licensee's "decision in April, 1982 to 'defer' construction for two to five years, and subsequent cessation of construction at WNP-1 was dilatory."
 8. Please explain fully what you mean by the word "defer" as used in your contention.
 9. Please explain fully what you mean by the word "dilatory" as used in your contention.
 10. What is the basis for your response to interrogatories 8 and 9?
 11. Why do you contend that Licensee has failed to establish good cause for an extension of the WNP-1 construction permit?
 12. What are the reasons you believe Licensee offered to NRC in support of a showing of "good cause" as required by 10 C.F.R. §50.55(b)?

13. What is the basis for your response to interrogatory 12?
14. Do you contend that the reasons offered by Licensee to support a showing of good cause are factually incorrect?
15. What is the basis for your response to interrogatory 14?
16. Do you contend that the reasons offered by Licensee to support a showing of good cause are not in fact the reasons why Licensee has requested an extension of its construction permit?
17. If your response to interrogatory 16 is yes, why do you believe that Licensee has (a) sought an extension of its construction permit and (b) deferred construction at WNP-1?
18. What is the basis for your response to interrogatories 16 and 17?
19. What is the basis for your statement that the "modified request for extension of completion date to 1991 does not constitute a 'reasonable period' of time provided for in 10 C.F.R. 50.55(b)?"
20. Please explain fully what you mean by a "reasonable period of time" as used in your contention.
21. What factors do you contend should be considered when determining if a requested construction permit extension is for a "reasonable period of time"?
22. What do you contend would constitute a "reasonable period of time" in the case of WNP-1?

23. What is the basis for your response to interrogatories, 20, 21 and 22?

Respectfully submitted,



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Counsel for Licensee

May 3, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Licensee's First Set of Interrogatories and Requests to Produce to Intervenor" in the captioned matter were served upon the following persons by deposit in the United States mail, first class, postage prepaid this 3rd day of May, 1983:

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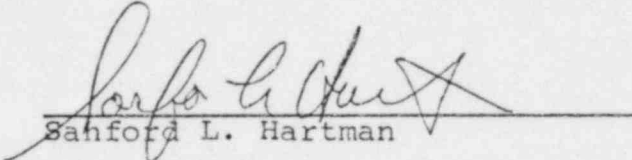
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