

United States of America  
Nuclear Regulatory Commission

mdv

In the Matter of: )  
CONSUMERS POWER COMPANY, ) Doc. Nos. 50-329  
(Midland Plant, Units 1 and 2) ) 50-330  
Operating Licensing

Wendell H. Marshall's reply to first set of Interrogatories from Consumer's Power Company.

- a. There was an extensive hearing concerning bad quality control.
- b. I wish to state and place you on notice that I waive no rights of any kind or nature whatsoever. I also wish to place you on notice that I intend to cross examine and recross any and all witnesses, experts or otherwise, produced to testify regardless of who they are testifying for or against on any future hearings of the matter.

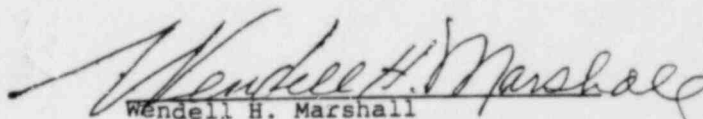
While at this time I am unaware that I will produce witnesses to rebut testimony given in the hearings I do not waive any rights to do so. When I know persons to be produced as witnesses upon behalf of myself and the Mapleton Intervenors I will place all interested parties on notice and produce the names and describe their qualifications as well as their expertise. At this time, I do not foreclose but keep my options open in this regard. At the same time I will assure you of proper time and notice that you should have to plead "surprise" outline as to the subjects they would address.

I intend to proceed and participate in future remedial soils hearings and further, like the fly on the bulldog's nose, great importance and significance is attached to the presently sinking Generator Building which is a safety-related building. I intend to participate to the fullest extent and bring about any and all types of inquisition that would offer a contribution to assist the deliberation of the A.S.L.B. Board to arrive at a proper determination in the disposition of this problem which threatens public health and safety to the citizenry in a 50-mile circumference from the vortex.

Moreover, I wish to reaffirm our interest in the failure of the applicants provision of Cooling Towers and, moreover, we wish to restate and confirm the applicants contention as stated under oath by Mr. Cook of Consumers Power Company personnel to the effect "that the prime contractor, Bectal Company, furnished the bodies" and that the Bectal Company supplied all of the construction know-how, and that, unlike Caesar's wife, they can do some wrong and that we stand agreed and that all of Ingersol Township, Midland Co., MI, as a matter of official record, stands agreed.

I have prepared these answers and this paper myself.

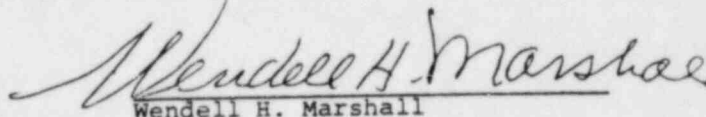
Signed,

  
Wendell H. Marshall

Pro Se

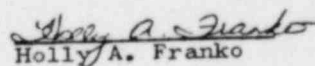
Certificate

Moreover that all members of the attached list have been furnished copies by being deposited personally by myself in the U.S. Mail, properly addressed and with sufficient postage.

  
Wendell H. Marshall

ATTACHED JURAT |

In and before me, a notary public of Midland County, Michigan, appeared Wendell H. Marshall; and in my presence affixed his signature to the foregoing certificate.

  
Holly A. Franko

My commission expires January 10, 1984.

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OFFICE OF SECRETARY  
CONSULTING & SERVICE  
BRANCH

I have seen most of the world and have been in its highest mountains. I have walked the valleys of all the continents and seen their wonders. Now and then I have come across a sanctuary equal to our best. But when a full accounting is made there is no continent on earth equal in natural wonders and glories to what we have here.

We must learn to love it and cherish it. We must put our arms around it and protect it as we would a fragile but precious child. Technology can destroy it. But it can also save it. Only we the people, not technology, have "values." Love, respect, admiration, tenderness—these must be our attitude toward this biosphere if it is not to meet the technological Armageddon.

—Justice William O. Douglas  
The New York Times  
July 1, 1973, § 4, p. 13

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