

6-16-75

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

ARIZONA PUBLIC SERVICE  
COMPANY, et al.

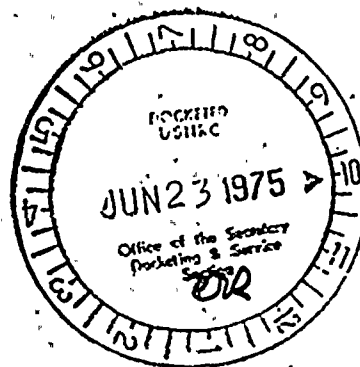
(Palo Verde Nuclear Generating  
Station, Units 1, 2 and 3)

Docket Nos. STN 50-528  
50-529  
50-530

INTERROGATORIES

TO: Applicant, ARIZONA PUBLIC SERVICE COMPANY, and its attorneys,  
SNELL & WILMER, Arthur Gehr and Bruce Norton.

Under authority of 19 CFR § 2.750, 10 CFR 2, App. A  
and the Federal Rules of Civil Procedure, Intervenor ARIZONA  
CLEAN ENERGY COALITION, hereby demand that Applicant Arizona  
Public Service Company (hereinafter APS) or their attorney  
answer in writing and under oath and within thirty (30) days  
from receipt hereof, the following interrogatories:





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NOTICE OF SERVICE OF INTERROGATORIES

Intervenor hereby give notice that non-uniform in-  
terrogatories nos. 1-9 have been served on Applicant APS this  
16th day of June, 1975.

ARIZONA PUBLIC LAW ADVOCATES

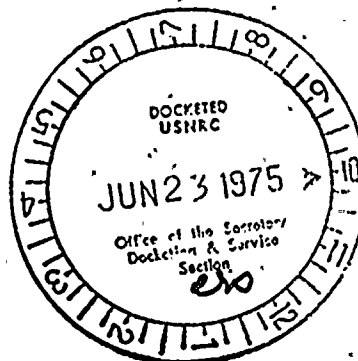
by Barbara E. Fisher  
BARBARA E. FISHER  
201 North Stone Avenue, Suite 210  
Tucson, Arizona 85701  
Attorney for Intervenor

COPY OF the foregoing  
mailed this 16th day of  
June, 1975, to:

Frederic S. Gray  
Thomas M. Bruen  
U. S. Nuclear Regulatory Commission  
Office of Staff Counsel  
Washington, D.C. 20555

Andrew W. Bettwy  
Assistant Attorney General  
1700 West Washington  
Phoenix, Arizona 85007

Carmine F. Cardamone, Jr.  
1415 North Third Avenue  
Tucson, Arizona 85705

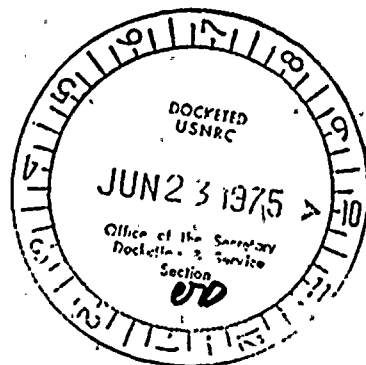




Bruce Norton, Esq.  
Arthur Gehr, Esq.  
SNELL & WILMER  
3100 Valley Center  
Phoenix, Arizona 85073

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

1. State fully and in detail a complete description of the financing method for the construction and operation of the PVNGS.
  
2. State fully and in detail the projected impact on rate payers of the ANPP for each of the participants in the project assuming output capacity percentages of 30, 40, 50, 60 and 70.
  
3. State fully and in detail the impact on the need-for-power analysis of the recent conservation effect noted in TG&E's sales figures over the last 3 years. Update the need-for-power analysis based on the most recent sales figures for all participants.
  
4. State fully and in detail all plans for security to prevent theft of radioactive material associated with ANPP.





5. State fully and in detail the effect upon the financial viability of the ANPP should the bond ratings for any of the participants decline.
6. State fully and in detail all comparisons of radioactive hazards between fossil fuel and nuclear plants. Include data from the three Four Corners coal plants.
7. State fully and in detail the management structure of the ANPP. State fully and in detail the relationship of APS to the other participants vis-a-vis the management and operation of ANPP.
8. State fully and in detail the extent of authority of any governmental body other than NRC has over any aspect of the ANPP. Include all relevant Federal, State and local governmental units in California, Arizona and New Mexico. State fully and in detail what the relationship is between NRC and other Federal, state and local governmental units.



9. State fully and in detail all plans, considerations and projections for contingency power generation in event that NRC rejects the application for the ANPP.

