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File
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UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

In the Matter of)

CONSUMERS POWER COMPANY)

(Palisades Plant))

Docket No. 50-255

INTERVENORS' MOTION FOR PRODUCTION
BY THE REGULATORY STAFF OF POST
OPERATIONAL INSPECTION REPORTS

Intervenors move for the entry of an order requiring the Atomic Energy Commission Regulatory Staff to produce copies of the post-operational inspection reports for the following pressurized water reactor plants:

- A. Indian Point No. 1 (Docket No. 50-3) - August 1962 to present;
- B. Yankee Rowe (Docket No. 50-29) - July 1960 to present;
- C. San Onofre (Docket No. 50-206) - June 1967 to present;
- D. Connecticut Yankee (Docket No. 50-213) - August 1967 to present; and
- E. Ginna (Docket No. 50-244) - November 1969 to present.

In support of their motion Intervenors state that, at the request of the Board, representatives of Intervenors reviewed in Washington in the public records of the Commission the monthly and semi-annual operating reports made by representatives of the above plants and determined that these reports contain at least the following irregular procedures:

- 1. Discharge sampling systems were frequently frozen and inoperative.
- 2. Extremely large concentrations of radioactivity were released from the plants;
- 3. Licensees' own reports of radioactivity released were incomplete in that there was no breakdown into concentrations or designations of isotopes released; and

a review of what Intervenor have seen with respect to the above-mentioned plants, such inadequacy casts doubt upon the propriety of the Staff's acceptance of certain assertions by Applicant herein with respect to what will happen post-operationally as well as with respect to monitoring systems. Accordingly, the AEC Regulatory Staff's procedure with respect to post-operational compliance is relevant to Applicant's and Staff's showing herein and the above-mentioned reports bear heavily upon the credibility of statements with respect to the AEC Regulatory Staff's post-operational procedures and how they operate.

Respectfully submitted,

One of the Attorneys for Intervenor