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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PUGET SOUND POWER & LIGHT)	Docket Nos. 50-522
COMPANY, et al.,)	50-523
)	
(Skagit Nuclear Power Project)	
Units 1 and 2))	August 27, 1979
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APPLICANTS' RESPONSE TO INTERVENOR SCANP'S
INTERROGATORIES TO APPLICANT DATED AUGUST 21, 1979

On August 21, 1979, Intervenor SCANP served certain interrogatories and requests for production to Applicant Puget Sound Power & Light Company and its attorneys.

These interrogatories and requests seek information concerning plant water systems, including blow down flow, the circulating water system, and the make-up water system. Applicants' object to these interrogatories and requests on the ground that they are untimely. They were not served by the June 1, 1979 deadline for initial discovery requests that was fixed at the April 24, 1979 conference. Tr. 11, 940-949. Furthermore, if they relate to any matter in controversy in this proceeding, which Applicants deny, they could only relate to matters on which the record has been closed and on which proposed findings of fact are under preparation and soon to be submitted. They are thus untimely on this additional

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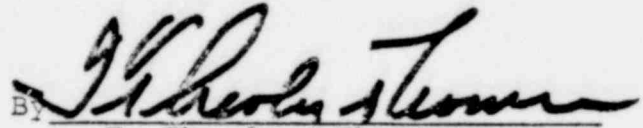
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ground. Finally, Applicants object to these interrogatories and requests on the additional ground that the information sought falls outside the permissible scope of discovery under 10 CFR 2.740(b) in that it does not relate to any matter in controversy in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence.

DATED: August 27, 1979

Respectfully submitted,

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BY F. Theodore Thomsen

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PUGET SOUND POWER & LIGHT COMPANY,)	DOCKET NOS.
et al.)	
)	50-522
(Skagit Nuclear Power Project,)	50-523
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_____)	

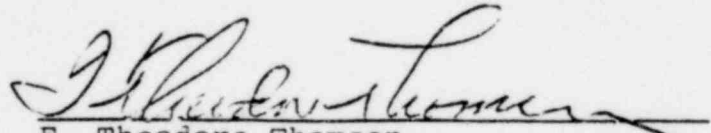
CERTIFICATE OF SERVICE

I hereby certify that the following:

Applicants' Response to Intervenor SCANP's
Interrogatories to Applicant dated August 21, 1979

in the above-captioned proceeding have been served upon the
persons shown on the attached list by depositing copies thereof
in the United States mail on August 28, 1979 with proper
postage affixed for first class mail.

DATED: August 28, 1979



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8/22/79

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