

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)
The Cincinnati Gas & Electric)
Company, et al.) Docket No. 50-358
(Wm. H. Zimmer Nuclear Power Station)

MIAMI VALLEY POWER PROJECT'S OBJECTIONS
TO CERTAIN OF APPLICANTS' FIFTH SET OF
INTERROGATORIES AND MOTION FOR A PROTECTIVE ORDER

On April 20, 1979 Applicants filed its fifth set of interrogatories for MVPP. For reasons stated hereinafter, MVPP objects to Interrogatories 17 and 23. MVPP is responding to the remainder of the interrogatories. MVPP further moves for a protective order, pursuant to 10 C.F.R. section 2.740 (c), that the objectionable discovery not be had.

Interrogatory 17 is irrelevant to any of the issues at hand in these proceedings. No answer should be required.

Interrogatory 23 would require MVPP to provide information which it is impossible for it to obtain, namely numbers and locations of each seal that does not meet specifications. MVPP has information that the seals were improperly manufactured, it has no knowledge of the numbers or present location of the seals. It would be burdensome at least, if not impossible, without a detailed, on-site inspection for MVPP to answer interrogatory 23. No answer should be required.

For the foregoing reasons, the stated interrogatories are objectionable and MVPP's motion for a protective order should be granted.

Respectfully submitted,

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