

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



In the Matter of )  
 )  
THE CINCINNATI GAS & ELECTRIC ) Docket No. 50-358  
COMPANY, et al. )  
 )  
(Wm. H. Zimmer Nuclear Station) )

APPLICANT'S SIXTH SET OF INTERROGATORIES TO  
MIAMI VALLEY POWER PROJECT

Pursuant to 10 C.F.R. §2.740b of the Nuclear Regulatory Commission's Rules of Practice, Applicant, The Cincinnati Gas & Electric Company, by its attorneys, hereby propounds the following interrogatories to intervenor, Miami Valley Power Project, to be answered fully in writing, under oath, within fifteen (15) days after service hereof in accordance with the following definitions and instructions:

Definitions and Instructions

1. For each interrogatory, please state the full name, address, occupation and employer of each person answering the interrogatory and designate the interrogatory or part thereof, he or she answered.

2. The following definitions shall apply:

(a) "Intervenor" or "Project" shall mean  
Miami Valley Power Project.

(b) "Person" shall mean an individual, person,

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corporation, proprietorship, partnership, or any other entity.

- (c) "Identification" or "identity," when referring to an individual, corporation, or other entity, shall mean that intervenor shall set forth the name, present or last known address, and if a corporation or other entity, its principal place of business or if an individual, his or her title or titles and by whom employed. Once an individual corporation, or other entity has been thus identified in answer to an interrogatory, it shall be sufficient thereafter when identifying that individual, corporation, or other entity to state merely his, her or its name.
- (d) "Description" or "describe" when referring to a document as hereinafter defined, shall mean that the intervenor shall set forth the author or originator, addressee(s), date, title and subject matter, the present custodian of any copy thereof and the last known address of each such custodian. In lieu of describing the document, intervenor may attach a copy thereof to its answers, indicating the question to which the attached document is intended to be responsive. If the information requested in this paragraph does not appear on the face.

of such attached document, then intervenor shall indicate that information for each document so attached.

- (e) "Document" shall mean any written, printed, typed or any other graphic matter of any kind or nature, and all mechanical and electronic sound recordings or transcripts thereof, in the possession, custody, or control of intervenor, or its officials, employees, or agents; it shall also mean all copies of documents by whatsoever means made.
- (f) "Date" shall mean exact day, month and year, if ascertainable, or, if not ascertainable, the best approximation (including the relationship to other events).
- (g) "Zimmer Station" shall mean the Wm. H. Zimmer Nuclear Power Station.

3. These interrogatories request all knowledge or information in intervenor's possession and/or knowledge and information in the possession of intervenor's agents, representatives, and, unless privileged, attorneys.

4. The following interrogatories apply to Contention 17 as admitted as an issue in controversy in this proceeding by the Atomic Safety and Licensing Board's "Memorandum and Order Admitting New Contentions" dated August 7, 1979.

### Interrogatories

1. Describe any document in the possession of the Project, its consultants or proposed witnesses related to Contention 17.

2. Identify which of the documents identified in response to Interrogatory 1 the Project will seek to introduce into evidence and which will be used during cross-examination of the Applicant's and Staff's witnesses.

3. Identify all individuals having expertise regarding Contention 17 that the Project has contacted either directly or indirectly or who has contacted the Project, directly or indirectly, regarding Contention 17 and give a summary of any information and/or opinion given by such individual with regard to the merits of the contention.

4. For each of the individuals identified in response to Interrogatory 3, state his home address, telephone number, present employer and address, his present occupation and position with his employer, and his education and training which give him expertise with regard to Contention 17. Identify all sections of the Zimmer application studied or read by each individual with regard to Contention 17.

5. Identify all witnesses to be offered by the Project, giving the information requested in Interrogatory 4 if not already provided, and summarize the testimony to be presented by each witness.

6. For each individual identified in response to Contention 3 and each member of the Project, its agents or

anyone providing assistance to it, identify all individuals employed by the Applicant, its contractors and agents and the NRC Staff, including the Office of Inspection and Enforcement, with whom contact was made by the Project or any individual identified in response to Interrogatory 3 or 5 regarding Contention 17. Give the dates and circumstances of each of the contacts and provide the information requested by Interrogatory 3 for each individual contacted. Summarize the substance of each contact with regard to information or opinions given or received relating to Contention 17.

7. Specify the dates of employment of Mr. Robert Hofstadter with Underwriters Laboratory, his responsibilities during the period of his employment, his participation in testing involving fire protection of cable trays in nuclear facilities. List his educational background and previous and subsequent employment. Specify which sections of the Zimmer application Mr. Hofstadter has read or studied.

8. Identify the individual or individuals who gave Mr. Hofstadter or the Project the directly or indirectly any material "in confidence." Provide his name, address, telephone number and his present employer and address. Identify all such material given to Mr. Hofstadter or the Project, either directly or indirectly. Identify why the individual or individuals thought any material given to Mr. Hofstadter was "confidential" or would be "suppressed" in any way.



9. In order to prevent undue repetition, Applicant hereby incorporates by reference all interrogatories contained in "NRC Staff Interrogatories to Robert Hofstadter, 312 Lee Street, Evanston, Illinois 60262 Regarding Miami Valley Power Project Contention Number 17" dated August 16, 1979 and "NRC Staff Interrogatories to Miami Valley Power Project Regarding Contention Number 17" dated August 27, 1979. It is a sufficient response to enclose a copy of the answers to these interrogatories as sent to the Staff with the required oath or affirmation.

Respectfully submitted,

CONNER, MOORE & CORBER



Mark J. Wetterhahn  
Counsel for the Applicants

August 24, 1979

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NUCLEAR REGULATORY COMMISSION

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Station) )

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Sixth Set of Interrogatories to Miami Valley Power Project," dated August 24, 1979, in the captioned matter, were served upon the following by deposit in the United States mail this 24th day of August, 1979:

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