

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

UNION ELECTRIC COMPANY)

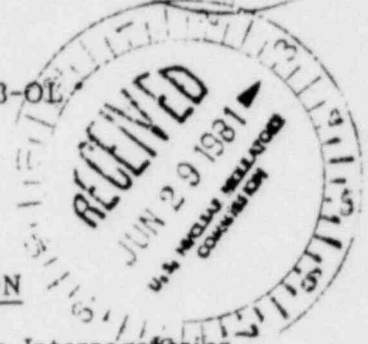
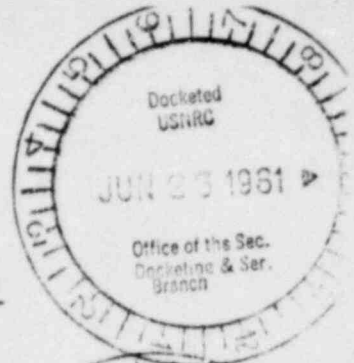
(Callaway Plant, Unit 1))

Docket No. STN 50-483-OL

JOINT INTERVENORS' OBJECTIONS TO
INTERROGATORIES AND REQUESTS FOR PRODUCTION

Joint Intervenors make the following objections to Applicant's Interrogatories and Requests for Document Production (Set No. 1) on both Contentions 1 and 2, and NRC Staff Interrogatories and Request for Production of Documents.

1. Joint Intervenors object to identifying persons known to us to have first hand knowledge of the basis for our contentions and persons who participate in providing answers to interrogatories. Applicant and the NRC Staff seek not only to know who our witnesses will be at the hearings in this matter, but also the names of all persons with whom Joint Intervenors have consulted in framing our contentions and answering interrogatories. See, e.g., Applicant's Interrogatories on Contention No. 1, 1A-1, 1A-6(c), General Interrogatory A; Applicant's Interrogatories on Contention No. 2, p. 2 (first paragraph), A-1(c); NRC Staff Interrogatories 1(h)(a) and (b), 13. Joint Intervenors recognize the need of the Applicant and Staff to know who our witnesses will be and we fully intend to supply that information in due course when that has been determined. However, the Applicant and Staff can have no legitimate need to know the identity of other persons, not witnesses, who have assisted and are assisting Joint Intervenors in this matter. That information is not relevant, and to identify such persons will only expose them to possible reprisals for their activities in support of Joint Intervenors. Joint Intervenors must, therefore, object to identifying such persons in order to protect them from adverse employment actions in their present and prospective positions, and other possible reprisals.



810680 0314

6

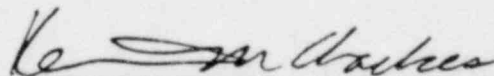
DS03
s
1/0

Under the Federal Rules of Civil Procedure, upon which the NRC's discovery rules are modelled, only the names of experts who are expected to testify at trial and those who have been retained or specially employed are discoverable. The identity of experts who have been consulted informally in anticipation of trial is not discoverable.

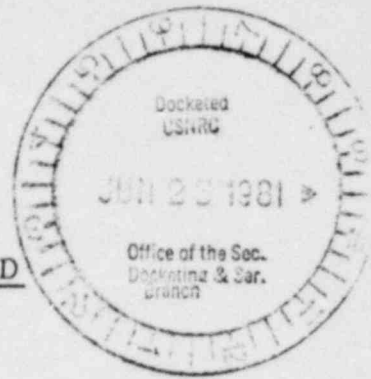
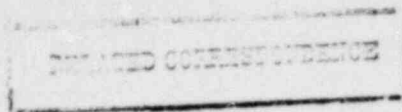
2. Joint Intervenors object to Applicant's request for identification and production of correspondence and written records of telephone conversations or meetings between Kay Drey and any employee of the NRC. See, e.g., Applicant's Interrogatories on Contention No. 1, 1A-16. The grounds for this objection are simply that Kay Drey is not a party to this proceeding and her correspondence and records are not in the custody and control of Joint Intervenors.

Respectfully submitted,

CHACKES AND HOARE



Kenneth M. Chackes
Attorneys for Joint Intervenors
314 North Broadway
St. Louis, MO 63102
314/241-7961



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

UNION ELECTRIC COMPANY)

(Callaway Plant, Unit 1))

) Docket No. STN 50-483-OL
)
)

CERTIFICATE OF SERVICE

I hereby certify that copies of Joint Intervenor's Objections to Interrogatories and Requests for Production have been served on the following by deposit in the United States mail this 22 day of June, 1981.

James P. Gleason, Esq., Chairman
Atomic Safety and Licensing Board
513 Gilmoure Drive
Silver Spring, MD 20901

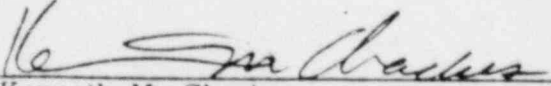
Mr. Glenn O. Bright
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry R. Kline
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas A. Baxter, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

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

Roy P. Lessy, Jr., Esq.
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555


Kenneth M. Chackes
CHACKES AND HOARE