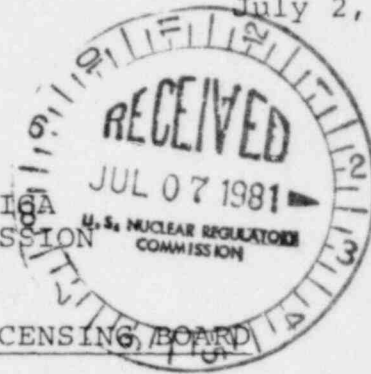
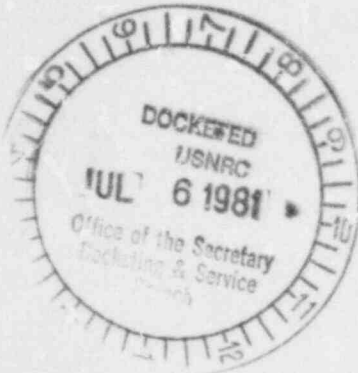


July 2, 1981



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
UNION ELECTRIC COMPANY	)	Docket No. STN 50-483 OL
	)	
(Callaway Plant, Unit 1)	)	

APPLICANT'S MOTION TO COMPEL  
DISCOVERY FROM JOINT INTERVENORS

Applicant UNION ELECTRIC COMPANY ("UNION ELECTRIC") moves this Board, pursuant to 10 C.F.R. §2.740(f), for an order compelling Joint Intervenor COALITION FOR THE ENVIRONMENT, ST. LOUIS REGION; MISSOURIANS FOR SAFE ENERGY; and the CRAWDAD ALLIANCE to respond fully to those interrogatories of Applicant to which Joint Intervenor have interposed an objection in Joint Intervenor's Objection No. 1, served on June 22, 1981.

As grounds for this motion, Applicant states that each of the interrogatories objected to by Joint Intervenor seeks information relevant to the subject matter involved in this proceeding and in particular seeks the identity and location of persons having knowledge of discoverable matter; and that the objections interposed to these interrogatories are without basis under the NRC Rules of Practice or the relevant decisional law.

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This motion is based upon the attached memorandum of points and authorities, and all other pleadings and papers on file in this proceeding.

Respectfully submitted,

CHAW, PITTMAN, POTTS & TROWBRIDGE

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Dated: July 2, 1981