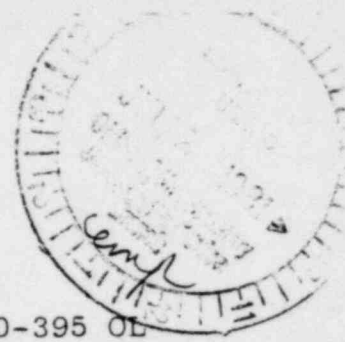


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF:

South Carolina Electric and
Gas Company

(Virgil C. Summer Nuclear
Station, Unit 1)

DOCKET NO. 50-395 OL

NOTICE OF MOTION AND
MOTION TO QUASH SUBPOENA

TO: BRETT BURSEY, Intervenor-applicant:

YOU WILL PLEASE TAKE NOTICE that pursuant to 10 C.F.R. 2.720(f), the South Carolina Department of Social Services on behalf of its Commissioner, Virgil L. Conrad, does hereby move to have quashed the within Subpoena (see the attached) issued by the Honorable Herbert Grossman, Administrative Judge, on the following grounds:

The Subpoena is unreasonable because (1) it is unduly vexatious in that it requires the attendance of the agency's chief executive officer thereby inhibiting the most effective and efficient operation of the agency at a most critical period in its fiscal year, namely, the state appropriations bill preparation period; (2) it requires the attendance of an officer who is not the most highly knowledgeable in the agency about the role of the agency in the development of radiological accident emergency response plans.

In the alternative to complete and total quashal, the movant would seek from this Honorable Tribunal a modification of the said Subpoena to allow the substitution of Mr. William S. Comer

for the said Commissioner Virgil L. Conrad on the basis that William Comer is the most knowledgeable employee in the agency with regard to radiological accident emergency plans.

SOUTH CAROLINA DEPARTMENT OF
SOCIAL SERVICES
OFFICE OF THE GENERAL COUNSEL

BY: Reddick A. Bowman, Jr.
Reddick A. Bowman, Jr.
Assistant General Counsel

Columbia, South Carolina

June 25th, 1981.