

August 19, 1981

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

KANSAS GAS & ELECTRIC COMPANY et al.

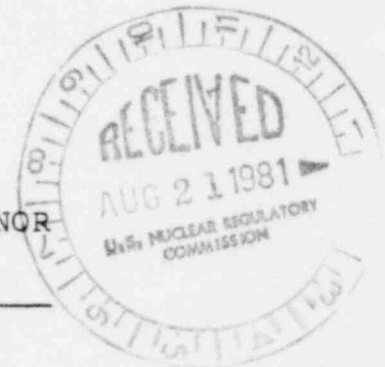
(Wolf Creek Generating Station,
Unit No. 1)

)
)
) Docket No. STN 50-482
)
)

APPLICANTS' FIRST REQUEST TO INTERVENOR
KANSANS FOR SENSIBLE ENERGY
FOR THE PRODUCTION OF DOCUMENTS

In accordance with the Licensing Board's July 15, 1981
"Order (Extension of Time)", and pursuant to 10 C.F.R. § 2.741,
Applicants request that Intervenor Kansans For Sensible Energy
("Intervenor") respond in writing to the following request for
production of documents and produce the original or best copy
of each of the documents requested below, on or before
September 24, 1981, at the office of Richard Terrill, Esq.,
Kansas Gas and Electric Company, or at a place mutually
convenient to the respective parties.

"Documents" means all writings and records of every type
in the possession, control or custody of Intervenor, including
but not limited to memoranda, correspondence, reports, surveys,
tabulations, charts, books, pamphlets, photographs, maps,



DS03
5
1/0

bulletins, minutes, notes, diaries, speeches, articles, transcripts and all other records, written, electrical, mechanical or otherwise.

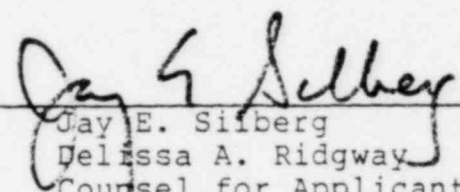
"Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody or control of Intervenor.

Applicants request that Intervenor produce each and every document identified or described in the answers to Applicants' First Set of Interrogatories to Intervenor Kansans For Sensible Energy.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By


Jay E. Silberg
Delissa A. Ridgway
Counsel for Applicants

1800 M Street, N.W.
Washington, D. C. 20036
(202) 822-1000

Dated: August 19, 1981