

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of  
Wisconsin Electric Power Plant  
(Point Beach Nuclear Power Plant,  
Units 1 and 2)

Docket Nos.

50-266  
50-301

OCT 6 1978

Office of the Secretary  
Regulatory & Service  
Division

INTERROGATORIES PROPOUNDED TO THE  
NUCLEAR REGULATORY COMMISSION  
STAFF BY THE STATE OF WISCONSIN

Pursuant to 10 C.F.R. sec. 2.720(h)(2)(ii), the presiding officer is requested to order the Nuclear Regulatory Commission staff to answer the following interrogatories and serve the answers thereto upon Patrick Walsh, Assistant Attorney General, 114 East, State Capitol, Madison, Wisconsin 53702.

INSTRUCTIONS

1. Answer each interrogatory separately and fully in writing under oath, unless it is objected to, in which event the reasons for objection must be stated in lieu of answer.
2. An evasive or incomplete answer is deemed to be a failure to answer under sec. 804.12, Stats.
3. You are under a continuing duty to seasonably supplement your response with respect to any questions directly addressed to the identity and location of persons having knowledge of discoverable matters, and the identity of each person expected to be called as an expert witness at the hearing. Furthermore, you are also under a similar duty to correct any incorrect response when you later learn that it is incorrect.

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4. The following terms are defined as follows for the purpose of these interrogatories:

A. Whenever in these interrogatories a request is made to "list," "describe," and "identify" documents, those terms shall be interpreted as a request to supply as to each document the following information where such information is appropriate for each document.

(1) The type of document (e.g. letter, memorandum, report, study, etc.);

(2) The date of the document;

(3) The date on which the document or copy thereof came to the staff's attention;

(4) The name(s) of the signer(s) of the document, and the author(s) if different from the signer(s);

(5) The name(s), if any, of the person(s) to whom the document is addressed;

(6) The present whereabouts of the document or copy thereof and the name and address of the custodian thereof;

(7) Whether the document requested in these interrogatories was in existence or available to the state, but is no longer available or in existence;

(8) Whether the staff claims that the document is privileged or otherwise not subject to discovery;

(9) A brief summary of the subject matter of the document; and

(10) Whether the staff is willing to produce the document.

B. As used in these interrogatories, the term "document" is used in a comprehensive sense and includes, without limiting its generality of meaning, all written, typed, printed, recorded, transcribed or graphic materials, however, produced, copied or reproduced, of every kind and description.

C. Whenever in these interrogatories a request is made to "list," "state the name of," "name," or "identify" a person(s), state the name(s), last known address, and the position or relationship of such person(s) to the staff.

D. Whenever in these interrogatories a request is made to state any facts, bases and/or information, in addition to stating the requested facts, bases, and/or information, identify the natural person(s) most knowledgeable as to each such fact, basis and/or information and list all documents which relate to any such fact, basis and/or information.

#### INTERROGATORIES

1. Briefly state the staff's position as to the technical merit of each of the intervenor's admitted contentions in this proceeding.

2. For each answer to interrogatory #1 above, please state the witness and/or witnesses expected to testify at the hearing on behalf of the staff regarding the staff's position.

3. For each answer to interrogatory #1 above, please state the technical report and/or reports or other documents relied upon by the staff in formulating its position.

BRONSON C. LA FOLLETTE  
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