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USNRCUNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSIONNOV 17 P1:46  
OFFICE OF SECRETARY  
ADMINISTRATIVE & SERVICE  
BRANCHIN THE MATTER OF )  
ILLINOIS POWER COMPANY, )  
SOYLAND POWER COOPERATIVE, INC. )  
and WESTERN ILLINOIS POWER )  
COOPERATIVE, INC. )Docket Nos. 50-461 OL  
50-462 OL(Operating Licenses for Clinton  
Power Station, Units 1 and 2)SECOND SET OF INTERROGATORIES  
BY APPLICANTS TO INTERVENOR

Illinois Power Company ("Illinois Power"), Soyland Power Cooperative, Inc., and Western Illinois Power Cooperative, Inc. (collectively "Applicants"), by their attorneys, pursuant to Section 2.740b of the Rules of Practice of the Nuclear Regulatory Commission, propound the following interrogatories to the Intervenor to be answered fully and separately in writing and under oath, the answers to be served upon Applicants within four weeks after receipt hereof, but not later than December 15, 1981.

## I. Definitions

1. "Identification" or "identify", when referring to a document, shall mean to set forth the authors or originators, addressee(s), date, title, and a brief description of the form of the document (e.g. letter, memorandum, tape recording, etc.) and of its subject matter, and the present custodian of the original and of any copies thereof, and the current or last known address of each such custodian. Alternatively, identification may be made by production of such documents for inspection and copying.

2. "Identification" or "identify", when referring to communication other than a document, shall mean to set forth the form of the

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communication (e.g. face to face meeting, telephone conversation, radio, etc.) by whom and to whom each such communication was made, the date it was made, the place at which it was made, the substance thereof, and to identify each of the persons party to, or present during, any part of the communication, to state where each participant in the communication was located at the time of the communication, and to state what was said in the communication by each participant therein.

3. "Identification" or "identify", when referring to a person or individual, shall mean to set forth the full name, present or last known residence address and telephone number of such person, the present or last known business address and telephone number of such person, employer and job title of the individual, and relationship to the Intervenor.

4. "Identification" or "identify", when referring to a corporation or other business entity shall mean to set forth its complete name and principal place of business.

5. "Document" shall mean documents and other tangible things and shall include without limitation, any written, printed, typed, or other graphic matter of any kind or nature, including all originals and non identical copies, together with all mechanical and electronic sound recordings (tape, disc, belt or any other type) or transcripts of such recordings, any letters, correspondence, memoranda, minutes, meeting schedules, attendance list, notes, telegrams (TWX, Telex, Cablegrams, Mailgrams or other types), pamphlets, publications, books, photographs, reports, charts, papers, and any other writings, printed and/or typewritten matter, including drafts, together with all copies of said documents by whatever means

made, produced or reproduced, known to, or in the custody, care, possession or under the control of, any officer, director, consultant, member, agent, attorney, or representative of the Intervenor. However, identification of duplicate copies of the same document is requested only if the original or copies contain some material, handwritten or otherwise, that is not on the other copies of the original.

6. "Second Special Prehearing Conference Order" shall mean that Second Special Prehearing Conference Order entered on May 29, 1981 by the Atomic Safety and Licensing Board of the Nuclear Regulatory Commission, In the Matter of Illinois Power Company, et al., Docket Nos. 50-461 OL and 50-462 OL.

7. "Intervenor" shall mean that party, the Prairie Alliance, granted leave to intervene in this proceeding according to the Second Special Prehearing Conference Order.

8. "Person" or "individual" shall mean any natural person, corporation, partnership, agency, association or other entity, and includes the plural.

9. "And" or "or" shall be construed conjunctively and disjunctively so as to require the broadest possible answers to any particular interrogatory.

10. "Contention" followed by numerical identification shall mean that contention correspondingly numbered and set forth in Appendix A to the Second Special Prehearing Conference Order.

## II. Claim of Privilege

If Intervenor refuses to answer any interrogatory or part thereof on claim of attorney-client privilege, attorney work product, or any other alleged privilege, Intervenor shall identify, to the extent consistent with its claim, the document or communication claimed to be privileged and state why the document or communication is privileged. If the privilege claimed is the attorney-client privilege, identify the attorney, the client, and all persons to whom the substance of the document or communication is known. If the privilege claimed is work product, identify the attorney who performed the work.

## III. Duty to Supplement and Amend

A. Pursuant to Section 2.740(e)(1) of the Rules of Practice of the Nuclear Regulatory Commission, Intervenor, with respect to its Answers to Applicants' First Set of Interrogatories which were served upon Applicants on August 1, 1981, is under a duty seasonably to supplement its response to any question directly addressing:

- (i) the identity and location of persons having knowledge of discoverable matters; and
- (ii) the identity of each person expected to be called as an expert witness at the hearing, the subject matter on which he is expected to testify, and the substance of his testimony.

B. Pursuant to Section 2.740(e)(2) of the Rules of Practice of the Nuclear Regulatory Commission, Intervenor, with respect to its Answers to Applicants' First Set of Interrogatories which were served upon Applicants on August 1, 1981, is under a duty seasonably to amend a prior response if it obtains information upon the basis of which:

- (i) it knows that the response was incorrect when made;  
or
- (ii) it knows that the response though correct when made is no longer true and the circumstances are such that a failure to amend the response is in substance a knowing concealment.

#### IV. Interrogatories

##### A. General

1. Identify the person or persons signing the answers to these interrogatories on behalf of the Intervenor.
2. Identify every person who participated in any way in the preparation of any answer or partial answer to each interrogatory set forth below and identify the substance of each person's participation.
3. Identify all persons ("Consultants") with whom Intervenor has consulted, contracted, or in any other way reached agreement to provide any kind of assistance to Intervenor in the operating license proceedings for the Clinton Power Station.
4. For each consultant identified in response to Interrogatory No. 3, as well as for Gregory C. Minor and MHB Technical Association, provide the following information:
  - a. Identify each agreement, written or oral, between Intervenor and the consultant and describe fully the terms of each such agreement.
  - b. Describe fully the assistance which the consultant has rendered Intervenor to date and the assistance which Intervenor anticipates the consultant will provide in the future.

- c. Identify all documents and communications which Intervenor has furnished to or received from any consultant identified in response to Interrogatory No. 3.
  - d. Describe fully each fee arrangement between Intervenor and any consultant, including the consultant's hourly or per diem charge, total fees paid to date, and total fees expected to be paid in the future.
- 5. For each interrogatory answered below, identify all documents and communications upon which Intervenor has relied in any way in providing the answer to such interrogatory.

B. Contention No. 3

- 6. Identify by page numbers or paragraph numbers each portion of each exhibit, transcript, pleading, brief and other document associated with Illinois Commerce Commission Proceedings Nos. 79-0071, 80-0544, and 80-0365 which allegedly establishes facts which support the allegations made in Contention No. 3.
- 7. With respect to Intervenor's answer to Interrogatory No. 19 of Applicant's First Set of Interrogatories identify specifically the "numerous representations by Applicant to and findings by, the Illinois Commerce Commission to the effect that Applicant's present and forecasted financial condition is deteriorating...."
- 8. With respect to Intervenor's answer to Interrogatory No. 19 of Applicant's First Set of Interrogatories, identify any information which has become available through the discovery process which supports the allegations made in Contention 3.

C. Contention No. 6

9. Explain fully in what ways the discovery conducted by Intervenor has changed, supplemented, or reinforced Intervenor's specific allegations made in Contention No. 6 and identify each document and communication discovered which has changed, supplemented or reinforced such specific allegation. This Interrogatory should be specifically answered for subparts (a)-(j) of Contention No. 6.
10. In view of Intervenor's statement in its Answer to Interrogatory No. 24 of Applicants' First Set of Interrogatories that its answer is incomplete as further information was forthcoming by the discovery process, Intervenor should revise its answer to Interrogatory No. 24 in light of any new information made available through its review of documents produced by Applicants.

D. Contention No. 9

11. With respect to Intervenor's answer to Interrogatory No. 35 of Applicants' First Set of Interrogatories, explain fully in what ways the discovery conducted by Intervenor has changed, supplemented or reinforced Intervenor's specific allegations made in Contention No. 9 and identify each document and communication discovered which has changed, supplemented, or reinforced such specific allegations.
12. With respect to Intervenor's answer to Interrogatory No. 35 of Applicants' First Set of Interrogatories, identify any other documents than the ones listed in that answer upon which Intervenor intends to rely to show that the effects of low-level radiation are much more significant than had previously been thought.

E. Contention No. 10

13. With respect to Intervenor's answer to Interrogatory Number 5 under Contention No. 10 of Applicant's First Set of Interrogatories, identify by document, page number, paragraph number, and section number, any further documentation received as a result of discovery, which supports the specific allegations made in Contention No. 10.

F. Contention No. 11

14. With respect to Intervenor's answer to Interrogatory Number 40 of Applicant's First Set of Interrogatories, identify by document, page number, paragraph number, and section number, any further information received through the discovery process which supports the specific allegations made in Contention No. 11.

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