

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

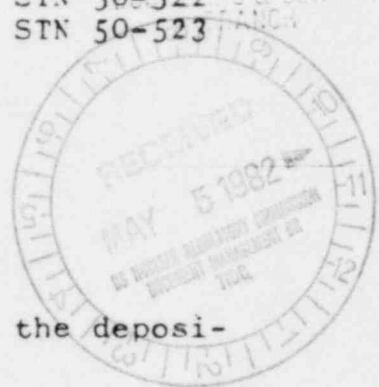
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'82 MAY -3 P4:00

In the Matter of)
FUGET SOUND POWER & LIGHT CO.)
et. al.)
(Skagit/Hanford Nuclear Project)
Units 1 and 2)

Docket Nos. STN 50-522
STN 50-523

RESPONSE TO NOTICE OF
TAKING DEPOSITION FOR M. TERRY DANA.



The Coalition for Safe Power hereby objects to the deposition of M. Terry Dana for the following reasons:

1. Discovery at this time is premature, see 10 CFR 2.751a;
2. Discovery does not relate to matters in controversy, see 10 CFR 2.740(b)(1);
3. Reasonable notice has not been given in writing. The Coalition received a copy of the "Notice of Taking of Deposition of M. Terry Dana" on April 28, 1982 and is expected to respond on the evening of May 4, 1982. See 10 CFR 2.740a(a); and
4. Applicant's wish to take the deposition of Coalition member M. Terry Dana amounts to harrassment and should not be allowed. See 10 CFR 2.740(c).

Coalition for Safe Power states further that it will move for a protective order regarding the discovery by deposition of M. Terry Dana, under 10 CFR 2.740(c) at the pre-hearing conference set for May 5, 1982.

Respectrully submitted,

Dated this day, the 28th
of April, 1982.

Sina Bell, Staff Intervenor
Coalition for Safe Power

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NUCLEAR REGULATORY COMMISSION

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In the Matter of)

TUCET SOUND POWER & LIGHT CO.
et. al.)

(Skagit/Hanford Nuclear Project
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Docket Nos. STN 50-522
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CERTIFICATE OF SERVICE

I hereby certify that Coalition for Safe Power's "RESPONSE TO NOTICE OF TAKING DEPOSITION FOR M. TERRY DANA" in the above-captioned proceeding has been served upon the persons show on the service list below by depositing copies thereof in the United States mail on April 28, 1982 with proper postage affixed for first class mail.

Judge John F. Wolf, Chairman
Atomic Safety and Licensing Board
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Secretary of the Commission
Docketing and Service Branch
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Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Dated this day, the 28th
of April, 1982.

Nina Bell
Nina Bell, Staff Intervenor
Coalition for Safe Power