

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)	
ARIZONA PUBLIC SERVICE COMPANY, et al.)	Docket No. STN 50-528
)	STN 50-529
(Palo Verde Nuclear Generating)	STN 50-530
Station, Units 1, 2 and 3))	

MOTION TO QUASH SUBPOENA

Pursuant to Section 2.720 of the Commission's regulations, William Paul Robinson, through Intervenor's attorney, respectfully moves to quash the subpoena served upon him on May 20, 1982, to appear for a deposition on May 24, 1982, to give testimony and produce documents on the following grounds:

1. Mr. Robinson is scheduled to testify at a hearing to be held by a committee of the legislature of the Commonwealth of Virginia on Monday, May 24, 1982, in Santa Fe, New Mexico. Therefore he will not and cannot be in Albuquerque on that day. Mr. Robinson, an expert on uranium exploration and development, has been scheduled to testify at this hearing for about two months.

2. Mr. Robinson, because of this prior engagement, will not be able to come to Phoenix, Arizona, until Tuesday, May 25, or Wednesday, May 26, 1982.

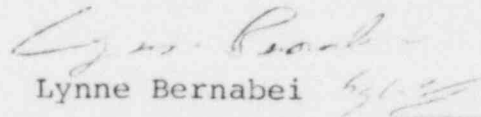
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3. Intervenor's counsel was not informed of Applicants' application for a subpoena until after issuance of the subpoena. During prior conversations with Applicants' counsel, Intervenor's counsel has said she will not oppose a deposition of Mr. Robinson after Tuesday, May 25, and that she will consent to a recess of the hearing to enable Applicants an opportunity for this deposition.

For the foregoing reasons, William Paul Robinson respectfully moves to quash the subpoena issued against him to appear and give testimony.

Respectfully submitted,


Lynne Bernabei

Dated: May 24, 1982

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION
TO QUASH SUBPOENA has been delivered on the following by
placement in the U.S. mail, postage prepaid, this 21st day
of May, 1982.

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Washington, D.C. 20555

Chairman, Maricopa County
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Atomic Safety and Licensing Board
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Washington, D.C. 20555

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