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June 3, 1982

Ms. Barbara A. Finamore, Esq.  
Natural Resources Defense  
Council, Inc., Suite 600  
1725 Eye Street, N.W.  
Washington, D. C. 20006

50-537

Re: CRBRP Discovery

Dear Barbara:

In response to our discussion on June 1, we are willing to undertake the following in order to complete discovery in the CRBRP proceedings:

1. In response to my inquiries of May 18th, 25th, and 27th, you asked whether June 24 would be an acceptable date for Dr. Cochran's inspection in Oak Ridge of the documents in response to Set 18, I, 19-20 and VI, 23-25. Although this date falls outside the close of discovery, and we obviously do not waive any rights to insist that additional follow-up document requests will be improper, we are willing to make the accommodation. Dick Baker (615/576-6456) at the CRBRP Project Office will be the point of contact. He will arrange office space, and duplicating services as requested on a cost-reimbursable basis. Dr. Cochran should contact Dick directly for final arrangements and assistance.
2. You asked whether the deposition of Applicants' witnesses previously agreed upon for June 16th (see my letter of May 28) could be left open so that any overflow could be held over until June 21. You also indicated that the persons identified in the health effects (contention 11) and decommissioning (contention 8) subject areas would not be deposed, and subject to confirmation by Mr. Greenberg, the persons in the safeguards area would probably not be deposed. You indicated that you would advise me concerning the latter. In any event, this means that you probably wish to depose persons in three subject areas (contentions 1, 2 and 3; contentions 5 and 7 [site and alternatives]; and contention 6 [fuel cycle]; and at most four areas (if safeguards is included)). We do not wish

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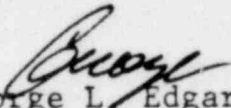
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Natural Resources Defense Council  
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to extend to the 21st. Discovery will be closed, and we would have to fly additional people back into Washington at no small expense to the Project. We are willing to make Mr. Anderson (design alternatives) available at some convenient date after the 16th, and we are also willing to work late on the 16th in order to give you a full opportunity for the deposition. I presume that you will give us a similar accommodation on Dr. Cochran's June 14 deposition.

I will expect to see you on the 14th at 9:00 a.m. in our office, and at the same time on the 16th in the Westinghouse Bethesda office.

Very truly yours,

  
George L. Edgar

cc: Service List

GLE:lpg

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of  
UNITED STATES DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION  
TENNESSEE VALLEY AUTHORITY  
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

CERTIFICATE OF SERVICE

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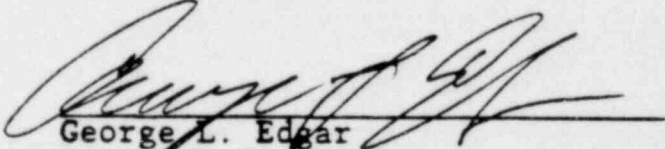
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DATED: June 3, 1982

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