

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

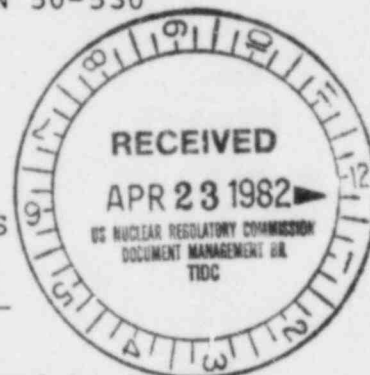
In the Matter of)

ARIZONA PUBLIC SERVICE)
COMPANY, et al.)

(Palo Verde Nuclear)
Generating Station,)
Units 1, 2 and 3))

Docket Nos. STN 50-528
STN 50-529
STN 50-530

JOINT APPLICANTS' RESPONSE TO INTERVENOR'S
MOTION FOR ORDER REQUIRING ADMISSION AND
PRODUCTION OF DOCUMENTS WITHIN TEN DAYS



On April 7, 1982, Joint Applicants received by hand delivery Intervenor Patricia Lee Hourihan's ("Intervenor") "Motion for Order Requiring Admission and Production of Documents Within Ten Days," dated April 7, 1982. Attached to Intervenor's motion is a document entitled "Arizona Nuclear Power Project, Palo Verde Nuclear Generating Station, Use of Effluent at Palo Verde," dated November 17, 1977 (hereinafter referred to as the "Effluent Document"). In her motion, Intervenor seeks an order requiring Joint Applicants to admit the genuineness of the Effluent Document, and to produce all engineering reports on which the following statement made at page 7 of the Effluent Document is based: "[I]n the average adverse summer months we expect our effluent requirements to peak at about 2600 A-F/unit."

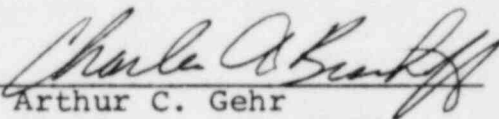
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Rather than await any Board order on Intervenor's motion, Joint Applicants offer in response the attached affidavit of E. E. Van Brunt, Jr. As set forth in Mr. Van Brunt's affidavit, the Effluent Document was prepared under his supervision and control during or about November, 1977. Mr. Van Brunt also describes in his affidavit the derivation of the effluent requirement figure of 2600 acre-feet per unit and explains that this figure was used by him for purposes of determining conservative contractual commitments. Finally, Mr. Van Brunt states that there are no "engineering reports" or other documents which provide a basis for the statement made respecting the figure of 2600 acre-feet per unit.

RESPECTFULLY SUBMITTED,

By



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Attorneys for Joint
Applicants

Dated: April 19, 1982