

June 8, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:  
Marshall E. Miller, Chairman  
Gustave A. Linenberger, Jr.  
Dr. Cadet H. Hand, Jr.

DOCKETED  
1982 JUN 10 10:25

UNIT OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )  
)  
)

UNITED STATES DEPARTMENT OF ENERGY )  
PROJECT MANAGEMENT CORPORATION )  
TENNESSEE VALLEY AUTHORITY )

Docket No. 50-537

(Clinch River Breeder Reactor Plant) )  
)  
)

ERRATA TO INTERVENORS, NATURAL  
RESOURCES DEFENSE COUNCIL, INC. AND  
THE SIERRA CLUB, DISCOVERY DOCUMENTS  
FILED WITH STAFF ON JUNE 4, 1982

Intervenors, Natural Resources Defense Council, Inc. and  
the Sierra Club, hereby submit the following list of corrections  
to the indicated discovery documents filed with Staff on June 4,  
1982.

1. Natural Resources Defense Council, Inc. and the Sierra Club  
Twenty-Fifth Set of Interrogatories to Staff:
  - a. Question 39 - change "largest" to "most conservative."
  - b. Question 76 - insert "or in the water" after the phrase  
"in the air or on the ground."

2. Natural Resources Defense Council, Inc. and the Sierra Club

Tenth Request to Staff for Admissions:

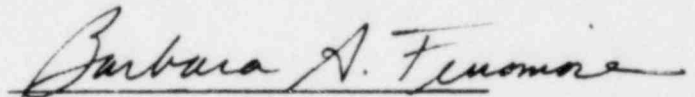
- a. Statement 23 - change "is have" to "has."
- b. Statement 40 - insert "human" before "lung."
- c. Statement 42 - insert "human" before "lung."
- d. Statement 44 - insert "human" before "lung."
- e. Statement 46 - insert "human" before "lung."

3. Natural Resources Defense Council, Inc. and the Sierra Club

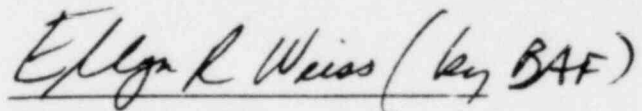
Request to Staff for Production of Documents:

- a. Request to Produce 8 - insert "Saudia and" before the phrase "Los Alamos National Laboratories" and before the phrase "Los Alamos National Laboratory."

Respectfully submitted,



Barbara A. Finamore  
S. Jacob Scherr  
1725 I Street, N.W., #600  
Washington, D.C. 20006  
(202) 223-8210



Ellyn R. Weiss  
Harmon & Weiss  
1725 I Street, N.W.  
Washington, D.C. 20006  
(202) 833-9070

Attorneys for Intervenors Natural  
Resources Defense Council and  
the Sierra Club

Dated: June 8, 1982

CERTIFICATE OF SERVICE

82 JUN 10 10:26

I hereby certify that copies of ERRATA TO INTERVENORS,  
NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB,  
DISCOVERY DOCUMENTS FILED WITH STAFF ON JUNE 4, 1982 were  
served this 8th day of June 1982 on the following:

Marshall E. Miller, Esquire  
Chairman  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
4350 East West Highway  
Bethesda, Maryland 20814  
(2 copies)

Mr. Gustave A. Linenberger  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
4350 East West Highway  
Bethesda, Maryland 20814

Daniel Swanson, Esquire  
Stuart Treby, Esquire  
Bradley W. Jones, Esquire  
Office Of Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Maryland National Bank Building  
7735 Old Georgetown Road  
Bethesda, Maryland 20814

Atomic Safety & Licensing Appeal Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety & Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing & Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
(3 copies)

R. Tenney Johnson, Esquire  
Leon Silverstrom, Esquire  
Warren E. Bergoholz, Jr., Esquire  
Michael D. Oldak, Esquire  
L. Dow Davis, Esquire  
Office of General Counsel  
U.S. Department of Energy  
1000 Independence Ave., S.W.  
Washington, D.C. 20585

George L. Edgar, Esquire  
Irvin N. Shapell, Esquire  
Thomas A. Schmutz, Esquire  
Gregg A. Day, Esquire  
Frank K. Peterson, Esquire  
Morgan, Lewis & Bockius  
1800 M Street, N.W.  
Washington, D.C. 20036

Dr. Cadet H. Hand, Jr.  
Director  
Bodega Marine Laboratory  
University of California  
P.O. Box 247  
Bodega Bay, California 94923

Herbert S. Sanger, Jr., Esquire  
Lewis E. Wallace, Esquire  
James F. Burger, Esquire  
W. Walker LaRoche, Esquire  
Edward J. Vigluicci, Esq.  
Office of the General Counsel  
Tennessee Valley Authority  
400 Commerce Avenue  
Knoxville, Tennessee 37902

William M. Leech, Jr., Esquire  
Attorney General  
William B. Hubbard, Esquire  
Chief Deputy Attorney General  
Lee Breckenridge, Esquire  
Assistant Attorney General  
State of Tennessee  
Office of the Attorney General  
450 James Robertson Parkway  
Nashville, Tennessee 37219

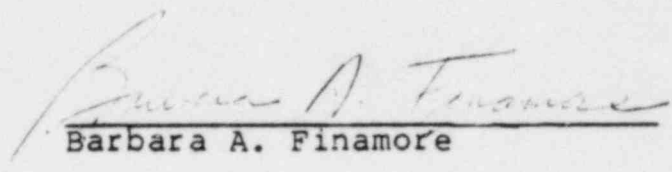
Lawson McGhee Public Library  
500 West Church Street  
Knoxville, Tennessee 37902

William E. Lantrip, Esquire  
City Attorney  
Municipal Building  
P.O. Box 1  
Oak Ridge, Tennessee 37830

Oak Ridge Public Library  
Civic Center  
Oak Ridge, Tennessee 37820

Mr. Joe H. Walker  
401 Roane Street  
Harriman, Tennessee 37748

Commissioner James Totham  
Tennessee Department of Economic  
and Community Development  
Andrew Jackson Building, Suite 1007  
Nashville, Tennessee 32219

  
Barbara A. Finamore