

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board

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In the Matter of:)	
)	Docket Nos. 50-329
CONSUMERS POWER COMPANY)	50-330
)	
(Midland Plant, Units 1 and 2)	<u>Operating License</u>

M. SINCLAIR'S RESPONSE TO BOARD'S REQUEST
FOR REASONS FOR LATE FILING OF NEW CONTENTIONS

According to the Board's Order that resulted from the telephone conference on June 25, 1982, I am providing reasons for good cause for filing my new contentions late.

I am complying under protest because this is a needlessly burdensome Order since it is clear from my contentions that these matters concern new and significant information developed since the original contentions were filed on October 28, 1978.

Contentions 1 and 2 deal with recent decisions of the U.S. Court of Appeals, April 27, 1982, and May 14, 1982, respectively.

Contention 3 is based on information reported in Science April 9, 1982.

Contention 4 refers to testimony provided in August, 1981.

Contention 5 refers to licensing recommendations by Dr. S. Hanauer after the TMI-2 accident and not covered by Midland SER (NUREG-0793) May, 1982.

Contention 6 has been identified as a problem since TMI-2 accident of March 28, 1979.

Contention 7 refers to erroneous data base for cooling pond as provided in Midland DEIS issued March, 1982.

Contention 8 refers to deficiency in Midland SER (NUREG-0793), of May, 1982.

Contention 9 refers to new information since TMI-2, March 28, 1979.

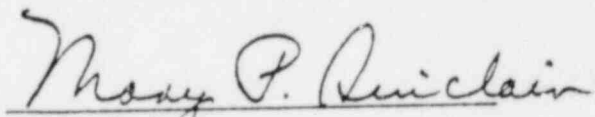
Contention 10 refers to information in Midland SER (NUREG-0793) of May, 1982.

Contention 11 refers to disclosures made in connection with licensing of the hazardous waste dump in July, 1981.

Contention 12 refers to information disclosed during hearings as described in Contention 11 and failure of NRC Staff and Applicant to deal with it in Midland SER (NUREG-0793) of May, 1982.

I also wish to give notice at this time that I will file further new contentions based on the disclosures of the June 21, 1982 meeting between Consumers Power Co. staff and Region III staff as well as the extensive documentation of quality control and safety problems which have been disclosed by workers at the Midland nuclear plant to the Government Accountability Project.

Respectfully submitted,


Mary Sinclair

cc: Charles Bechhoefer, Esq.
Mr. Ralph S. Decker
Dr. Frederick P. Cowan
Jerry Harbour, Esq.
Secretary, U.S. Nuclear Regulatory Commission
Michael I. Miller, Esq., Ronald G. Zamarin, Esq., Alan S. Farnell, Esq.
Mr. Wendell Marshall
Ms. Barbara Stamiris
William Paton, Esq.