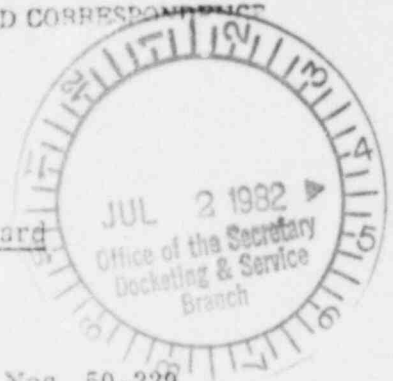


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board



In the Matter of: )

CONSUMERS POWER COMPANY, )

(Midland Plant, Units 1 and 2 )

Doc. Nos. 50-329

50-330

Operating License

MARY SINCLAIR'S REPLIES TO FIRST SET OF  
INTERROGATORIES FROM CONSUMERS POWER CO.

Contention 6

1. a. The extensive hearing record of the poor quality control at Midland and Palisades support this contention and those documents will be used.
- b. I have no witnesses, but I expect to rely on the witnesses that the Nuclear Regulatory Commission will call. I am sure the NRC will call upon competent witnesses for this contention since the NRC already has a \$4 billion law suit against it for failure to regulate adequately and assess the safety of the TMI-2 plant, and it will not want to risk this again at the Midland nuclear plant. In the event that I do raise funds for witnesses. I will choose well-qualified persons who will be able to address these issues in a competent way and make a significant contribution to the record.
- c. I do not expect to call Dr. Charles Anderson as an expert witness in the Operating License proceedings at this time. The extraordinary rudeness with which he was treated during the ACRS review in Midland was too stressful for both of us to be able to consider another encounter of this kind at this time. If matters change, I will advise the Applicant and the NRC.
- d., e. No witnesses are planned at this time.

In response to interrogatories 2 and 3 see d. and e. above.

Contention 7

I. a. Facts that support this contention include all the events that led to the show cause hearing on quality control (the first such hearing in the U.S.) in regard to the Midland nuclear plant ordered in December, 1973 and held in 1974. The key document for initiating this proceeding is the letter of Rosenthal, et al to L. Manning Muntzing, AEC Director of Licensing, November 26, 1973. Other documents are;

1. The record of the Applicant in the suspension proceedings as well as in the soil settlement hearings.
2. The memos indicating that the Applicant never could make their rad waste holding tanks work at Palisades but operated the plant anyway, and that they withheld that information from the NRC during many months but also, in fact, lied to the NRC (then AEC) about this matter, will be further documents relied upon for this contention. (Memos dated March 16, 1972; March 22, 1972; Letter to Mr. Boyce H. Grier, April 10, 1972; AEC, January January 26, 1976)

I. b. through e. Same as Contention 6.

Contention 24 - OL-OM Proceeding

Contention 27

I. a. Documents on emergency planning from FEMA; TMI Public Interest Resource Center, June, 1980; documents from state and local emergency planning teams; also from interrogatories.

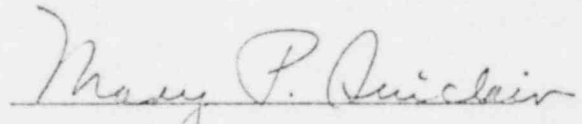
b. through e. Same as Contention 6.

Contention 28 through 57 - Facts are as stated in these contentions.

I. a. Documents - Draft copy of NUREG-0410; Black Fox Testimony; Final copy of NUREG-0410; all documents requested in interrogatories; all new information available through responsible current publications as identified through continuing research.

b. through e. Same as Contention 6.

4. I do not know their names or whether they work for Consumers Power Co. or Bechtel or other contractors. The Government Accountability Project matters have been handled by other people in the Lone Tree Council.
5. See No. 4.
6. I have prepared the answers to these interrogatories myself.

  
Mary Sinclair

cc: William Paton,  
Michael I. Miller, Ronald G. Zamaring, Alan S. Farnell  
Mr. Wendell Marshall  
Ms. Barbara Stamiris  
Secretary, U.S. Nuclear Regulatory Commission