

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

UNION ELECTRIC COMPANY)

(Callaway Plant, Unit 1))

Docket No STN 50-483

MOTION TO COMPEL DISCOVERY

The undersigned respectfully moves that the Board, by order, compel the State of Missouri and Callaway County to respond to discovery requests submitted to said entities, by the undersigned, on 16 June 1982.

DISCUSSION

Callaway County was authorized intervention status in the above captioned matter by Board order served 05 February 1981. The State of Missouri was granted the same status in said Board order of 05 February 1981. Mr. Reed initiated discovery against said entities under the provisions of 10 CFR, Part 2, Sections 2.740 and 2.741, in due form on 16 June 1982, indicating that responses were due by not later than 14 days after service.

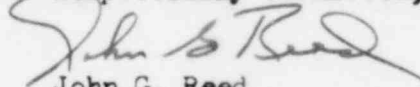
As of this date, neither entity has responded to such discovery nor have they indicated a need for additional time to complete such response.

Failure of the State of Missouri and Callaway County to expeditiously respond to said discovery requests poses an impediment to meeting Board schedules for discovery and can delay Mr. Reed's consolidation of evidence to support his contentions at the hearing scheduled on 11 October 1982.

SUMMARY

For the reasons identified above and in order to assist in the expediting of the scheduled hearing, Mr. Reed respectfully requests that the Presiding Judge of the Atomic Safety and Licensing Board issue such order as may be necessary to secure timely response from the State of Missouri and the County of Callaway to the discovery requests submitted by the undersigned. Additionally, it is requested that said responses be made available to Mr. Reed at least five days before the last day for filing discovery requests (see Board Order, dtd 09 June 1982). Said five days will permit perusal of responses and final interrogation needed to clear up questions relating to such responses. Or, in the alternative; it is requested that Mr. Reed be granted an extension of five days, after receipt of said responses, in order to initiate any final discovery needed to resolve such questions as may arise. Such extension to be applied to each set of responses received from the State of Missouri and/or the County of Callaway.

Respectfully submitted,




John G. Reed
Citizen of the United States
of America

Dated this 01st day
of July 1982, at
Kingdom City, MO.

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