

# Natural Resources Defense Council, Inc.

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July 28, 1982

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Morgan, Lewis & Bockius  
1800 M Street, N.W.  
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DOCKET NUMBER 50-537  
PROD. & UTIL. FAC.

Dear George:

This letter is to confirm our conversations of July 15 and July 28, 1982 concerning Intervenor's June 28, 1982 Motion to Compel Discovery on Interrogatory #27 of Intervenor's Nineteenth Set of Interrogatories (dated June 4, 1982). The Board denied this motion June 30, 1982 because the parties had not conferred directly before the motion was filed. However, the denial was "without prejudice to filing a motion that complies with prior discovery orders." Order at 2.

I conferred with you on July 15, 1982 to determine whether Applicants would provide a complete and direct answer to Interrogatory #27. We agreed that the term "probabilistic analyses of CRBRP accident risks and/or consequences" used in that interrogatory refers to any quantitative probabilistic or quantitative reliability data of CRBRP accident risks and/or consequences. You indicated that you would confer with Applicants and let me know whether Applicants would provide a complete and direct answer to Interrogatory #27.

When two weeks went by without an answer, I called you again on July 28, 1982. You stated that Applicants would supplement Interrogatory #27 within this week or next. You said that the supplementary answer would state that, given the definition of Interrogatory #27 agreed to by the parties on July 15, 1982, Applicants had not yet determined what probabilistic analyses they intended to rely upon during the LWA-1 proceeding. I noted that it should be possible to provide a supplementary answer sooner than next week if the answer stated only that Applicants had not yet made the requested determination. You said that an earlier response was not possible. You also stated that it will

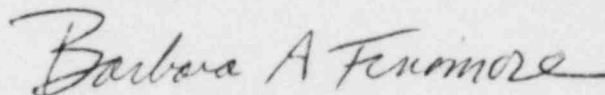
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George L. Edgar, Esq.  
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be several weeks before applicants will be able to determine which CRBR probabilistic risk analysis they intend to rely upon during the LWA-1 hearings.

Sincerely,

A handwritten signature in cursive script that reads "Barbara A. Finamore". The signature is written in dark ink and is positioned above the printed name and title.

Barbara A. Finamore  
Counsel for Intervenors  
Natural Resources Defense  
Council, Inc. and the  
Sierra Club

cc: Service List