

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
DUKE POWER COMPANY, et al.
(Catawba Nuclear Station,
Units 1 and 2)

Docket Nos. 50-413
50-414

May 25, 1983



PALMETTO ALLIANCE MOTION TO ESTABLISH DISCOVERY SCHEDULE
ON ITS QUALITY ASSURANCE CONTENTION 6

Pursuant to 10CFR Section 2.740(b)(1) and the Board's direction of May 13, 1983, Palmetto Alliance hereby moves for an Order establishing a Discovery Schedule, as hereafter set forth as Attachment 1, with respect to its Quality Assurance Contention 6. This relief by way of the extension of discovery on this contention is sought in order that Palmetto Alliance may have access to relevant, material evidence bearing on significant Quality Assurance program breakdowns at Catawba not yet available to it, in order that it may prepare for the fair and expeditious hearing of this matter and on the basis of good cause as is shown below.

Direct evidence from numerous Catawba Quality Control inspectors of systematic quality assurance deficiencies including falsification of documents, harrassment, intimidation and a "whitewash" investigation by Duke Power Company, all known to the Nuclear Regulatory Commission Staff, has come to the attention of

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Palmetto Alliance only in mid-April 1983. See, NRC Staff Second Supplemental Response to Palmetto Alliance First Interrogatories and Production Requests on Contentions 6 and 7 (re: General Interrogatory 4), April 8, 1983, transmitting the Memorandum of P.K. Van Doorn, Senior Resident Inspector, Catawba to Carl E. Alderson, Director, Enforcement and Investigation Staff, dated 3/15/82, Attachment 3; "handwritten notes from QC and QA Inspectors which set forth their specific problems and concerns." Item 10 of Attachment 1 to April 12, 1983, Duke Power Company letter; Attachment 4; and 26 April 1982 Management Analysis Company (MAC) Report 1 Attachment 6. As late as May 19, 1983 (one day prior to the scheduled May 20, 1983, close of discovery on this contention and at the commencement of a Palmetto Alliance deposition of Inspector Van Doorn), the NRC Staff produced some 97 "additional documents" comprising several hundred pages, identified in the course of a "partial response" to a Freedom of Information Act request regarding Catawba inspector allegations filed by the Government Accountability Project. See, May 19, 1983, letters of George Johnson, Esq., to counsel for Palmetto Alliance and of J. M. Felton, NRC to Billy P. Garde, Government Accountability Project, Attachment 11. Included in these "additional documents" was a notice of significant licensee meeting between Duke and the Region II NRC Staff conducted May 25, 1982, on the QC allegations significantly not circulated to this Board or the parties until now; and; an undated Memo from Inspector Van Doorn to Vorse of the Office of Investigation detailing Van Doorn's conclusions that falsification of

documents, harassment and intimidation of QC inspectors had occurred at Catawba. Attachments 7 and 5 respectively. Palmetto Alliance is informed that the NRC Office of Inspector and Auditor has initiated an investigation of the Staff handling of the Catawba inspector allegations. See, May 15, 1983, Charlotte Observer, "NRC Unit Examines Probe," Attachment 10.

In its February 2, 1983, Memorandum and Order establishing the present schedule in this proceeding, the Board observed:

"Generally speaking, Licensing Boards determine scheduling matters on the basis of representations of counsel about projected completion dates, availability of necessary information, and adequate opportunities for a fair and thorough hearing."

Order, at p. 8. The Board also observed that additional discovery time "could be obtained upon a showing of good cause." Order, at p. 10.

Rule 26(f), Federal Rules of Civil Procedure, provides guidance for the convening of a discovery conference in order to establish a discovery plan and schedule, upon motion of counsel setting forth:

- (1) A statement of the issues as they then appear;
- (2) A proposed plan and schedule for discovery;
- (3) Any limitations proposed to be placed on discovery;
- (4) Any other proposed orders with respect to discovery; and
- (5) A statement showing that the attorney making the Motion has made a reasonable effort to reach agreement with opposing attorneys on the matters set forth in the Motion.

With the provisions of Rule 26(f) as a guide, Palmetto will endeavor to organize its showing in support of this Motion.

CONTENTION 6: QUALITY ASSURANCE AT CATAWBA

As originally plead in its December 1981 Supplement to its Petition to Intervene, Palmetto Alliance Contention 6 read as follows:

6. Substandard workmanship and poor quality control strongly suggest that actual plant construction is substantially below NRC standards in many safety related areas. Applicants have failed to provide a Quality Assurance program which meets the requirements of 10CFR Part 50, APP. B., and no reasonable assurance exists that the plant can operate without endangering the health and safety of the public. The Commission has noted that 'The regulated industry . . . bears the primary responsibility for the proper construction and safe operation of licensed nuclear facilities.' Federal Tort Claim of General Public Utilities Corp., et al, CLI 81-10, 13 NRC 773, 775-776 (1981). The NRC's Systematic Assessment of Licensee Performance Review Group found the Catawba facility 'Below Average' among power reactor facilities under construction particularly 'in the areas of Quality Assurance including management and training.' NUREG, 0834, NRC Licensee Assessments, August 1981, p. B-1. A number of former Duke Power Company construction workers, including a certified Quality Control Inspector, have complained of systematic deficiencies in plant construction and company pressure to improve faulty workmanship.

In its December 1 Memorandum and Order the Licensing Board recast and admitted Palmetto Contention 6, observing:

Much of Palmetto 6, which is concerned with substandard workmanship and poor quality control,

lacks sufficient specificity. The last sentence, however, concerns alleged 'corner cutting' and does supply a sufficient basis for a contention. We recast the contention that we now accept to read as follows:

"Because of systematic deficiencies in plant construction and company pressure to approve faulty workmanship, no reasonable assurance exists that the plant can operate without endangering the health and safety of the public."

"The thrust of this contention is primarily toward alleged company attitudes and practices; proof of this contention, presumably involving specific instances of misfeasance need not be adduced at this stage."

Id., at p. 5.

Board Chairman Kelley observed at the January 12, 1982, Pre-hearing Conference that in order to prove a case on Contention 6 Palmetto Alliance must "get . . . more specific about quality assurance . . . that is substandard" TR, 119. As acknowledged in its Responses to Applicant's initial discovery and on the record at the first pre-hearing conference, the "former Duke Power Company employees" referred to in the body of the contention are Nolan R. Hoopingarner, II, and William R. McAfee. Mr. Hoopingarner observed substandard work and poor quality control, and experienced retaliation for making complaints to the NRC and others. Mr. McAfee, the former certified electrical Quality Control Inspector, observed substandard work and poor quality control, and experienced pressure to approve faulty work.

As further basis for its original contention, Palmetto Alliance cited the SALP 1 Report, NUREG 0834 rating of Catawba among some of the most notorious "Below Average" nuclear plants under

construction, most with widely known quality assurance breakdowns: Marble Hill, Midland, South Texas, Washington Nuclear Project 2, Watts Bar, and Zimmer. Id. App. B.

The SALP Board criticized Catawba for "weaknesses in the area of quality assurance" and "numerous items of non-compliance involving failure to follow procedures for activities involving welding, concrete placement, design, quality control inspections, records control, and electrical equipment installation." NUREG 0834, Appendix B-1.

Only by use of the tools of discovery could Palmetto probe beyond the information directly known to it upon which its contention was based, investigate the breadth of these documented problems at Catawba, and seek to prove its case.

DISCOVERY ON PALMETTO'S QUALITY ASSURANCE CONTENTION 6

Palmetto Alliance served its "First Set of Interrogatories and Request to Produce" on Applicants April 20, 1982, seeking, inter alia, the basis for the "Below Average" SALP 1 rating, Interrogatory 26; identification of documents reflecting QC Inspector disputes with supervision, Interrogatory 23; and worker complaints of substandard workmanship and pressure to perform or approve faulty workmanship, Interrogatory 25. Upon the Motion of the applicants, the Board suspended discovery on Contention 6 by Order of May 25, 1982, pending appeal by Applicants and Staff of the March 5, 1982, Board Order admitting contentions. On December 1, 1982, the Board admitted Contention 6, as recast, and

lifted the stay on discovery. Applicants first discovery response, "Applicants Responses to Palmetto Alliance First Set of Interrogatories and Request to Produce," was not served until December 31, 1982. This response contained virtually no substantive information, but did identify some documents, but with the following caveat: "Applicants do not now represent that this list is complete." Applicants Response at page 41.

On May 7, 1982, the NRC Staff responded in opposition to Palmetto's Motion to Require Staff Answers and objected to Palmetto Alliance Discovery on Contention 6. No answers whatsoever were provided by the NRC Staff at that time.

By Order of February 9, 1983, the Board granted Palmetto Alliance's Motion to Compel, in part, and Applicants filed their Supplemental Responses on February 28, 1983, containing the first substantive description of Quality Control Inspector disputes and complaints, Id. at pages 29-43. The first documents reflecting this information were made available at Palmetto Alliance's March 14, 1983, trip to Applicant's Charlotte, N.C., offices.

Meanwhile, on February 17, 1983, the NRC Staff filed its first substantive answers to Palmetto discovery on this contention in its "NRC Staff Supplemental Response to Palmetto Alliance Interrogatories and Production Requests on Contentions 6 and 7." There at p. 2, the NRC Staff explains that it is voluntarily responding (or objecting) to only those interrogatories where, in its judgment, "had there been a proper showing under Section 2.720(h)(2)(ii), the Staff could have been required to respond." Regarding Contention 6 answers and objections to Interrogatories

3, 4, 8, 10, 11, 15, 26 and 27 are provided. No answers or objections were provided to Interrogatories 23 and 25. While some documents are identified in response to specific interrogatories, the Staff's response remains incomplete: "The Staff is attempting to identify other responsive communications not identified in these earlier submittals, and intends to supplement this response," Id. at p. 5.

On March 25, 1983, Applicants filed their Responses to "Palmetto Alliance Follow-up Interrogatories and Request to Produce" regarding Contention 6 which had been served on March 16, 1983. In this Response, at p. 22, Applicants responded to Follow-Up Interrogatory 9 seeking identification of documents regarding the Catawba Welding Inspector Task Force:

Documents responsive to this interrogatory will be identified and made available for inspection and copying by March 30, 1983.

Id. By letter of April 7, 1983, Applicants transmitted the identified documents responsive to this interrogatory, however "the descriptive index for these documents has not been completed. The Index will be sent to you when complete." Id.

On April 8, 1983, the NRC Staff served its "Second Supplemental Response to Palmetto Alliance First Interrogatories and Production Request on Contentions 6 and 7 (re: General Interrogatory 4)." The Staff describes this response as identifying "communications, which relate to the Staff's investigation of allegations by certain Duke Power Company

Quality Control Inspectors." However, the Staff withholds and deletes significant information which it characterizes as "directly identifying certain confidential informants to the Staff, or providing portions of communications which would identify such informants." The Staff asserts that "since all the relevant information, save the identity of the confidential informants is available (assertedly from Applicant's responses), there is no need for Palmetto to obtain the information from the Staff." Id. at p. 3. It is this April 8, 1983, Staff response which includes the March 15, 1982, Van Doorn memo reflecting direct Staff knowledge of allegations of harrassment, falsification, significant violations of the Q.A. Program, and inspector concerns that Duke would attempt to "whitewash" the welding inspector technical concerns. See, Attachment 3. But for the claim of privilege, to protect the identity of confidential informants (to which counsel for Palmetto Alliance expressed no objection as a matter of principle, see Certification of Counsel attached to April 8, 1983, response, supra), the NRC Staff expressed no reservation whatever regarding the completeness of its Second Supplemental Response.

By telephone conversation of March 9th or 10th with Applicant's counsel, counsel for Palmetto Alliance had questioned the completeness of Applicant's Supplemental Response of February 28, 1983, to the critical original interrogatories 23 and 25. That Supplemental Response contained apparently significant limiting language:

The following documents relate to 1) disagreements , disputes, or differences of opinion between quality assurance inspectors and their supervisors or Duke Power management within the scope of interrogatory 23 which have not been resolved as between the supervisor and the inspector, Emphasis added.

Id. at p. 29.

By letter of April 12, 1983, counsel for Applicants responded:

"In an earlier conversation (on March 9 or 10) you had raised questions with regard to our response of February 28, 1983, to those interrogatories. In accordance with our discussions, we agreed to broaden our search for documents responsive to your request. That was done, and the widened search has recently been completed. It included, among other things, our meeting with QA employees at Catawba. As we discussed, the documents were available for inspection March 30. However, the identification of those documents has only recently been completed. That identification is Attachments 2, 3 and 4 to this letter."

Id. at p. 2.

Attachments 2, 3 and 4 represent 86 separately identified documents, comprising several hundred pages of material.

By letter of April 14, 1983, Applicant's counsel, Mr. Gibson, identifies further documents responsive to interrogatories on Contention 6 regarding a May 25, 1982, meeting between Duke Power Company and the NRC Staff regarding the Catawba Welding Inspector Investigation:

The 'NRC Staff Second Supplemental Response to Palmetto Allitance First Interrogatories and Production Request on Contention 6 and 7 (re: General Interrogatory 4)' produces documents from a May 25, 1982, presentation by Duke to NRC concerning resolution of inspector concerns. Upon receipt of this Staff response, we requested all documents pertaining to the May 25 presentation. .

. . . The documents are identified on Attachment A to this letter.

Id.

By oversight of counsel, this letter was sent only to Charleston, S.C., and not to the Palmetto Alliance's Columbia office where this counsel has been engaged in work on this proceeding, and to which all correspondence has been customarily addressed. It was not until two weeks later, then, that Palmetto actually received Applicant's April 14, 1983, correspondence. At counsel's request, on April 28, 1983, those identified documents were transmitted by Applicants under cover letter of April 29, 1983. Among significant new documents reflecting the Duke and NRC "resolution" of the welding inspector allegations was a December 20, 1982, file memo of Duke's corporate QA manager, G. W. Grier, reflecting his meeting of that date with NRC Resident Inspector, Kim Van Doorn, and attaching Inspector Van Doorn's "notes of Van Doorn interviews with Catawba inspectors," See Attachment 8. Upon inquiry by Palmetto Alliance, counsel for the NRC Staff explained the omission of these Van Doorn notes from the Staff's document identification as an "oversight." He asserted that he was unaware of the existence of such notes, but that their transmittal to Duke Power Company in December 1982 was not inconsistent with the NRC Staff's claim of confidential source privilege (as asserted in the April 8, 1983, Second Supplemental Response) notwithstanding the notes reflection of substantive concerns and identification of the number of persons expressing these concerns.

In mid-March 1983, it came to the attention of Palmetto Alliance that Applicant Duke Power Company had directed written communication to former Catawba workers, which, in our judgment sought to discourage and "chill" cooperation by these workers with Palmetto Alliance and the NRC in investigating potential quality assurance problems at the facility. Former QC Inspector and Palmetto Alliance member, William R. McAfee, informed counsel for Palmetto Alliance that he had received such communication. At the Board's direction, in a May 18, 1983, conference call, Applicants provided, by letter of March 22, 1983, a report describing their communication with present and former Catawba workers. The written communication warns the recipients that they may be contacted by Palmetto Alliance and explicitly identifies Messrs. Hoopingarner and McAfee as former Duke employees, Palmetto Alliance members, and potential witnesses in the proceeding.

At about the same time Applicants sought Board limitations on Palmetto's ability to communicate with present and former Catawba workers. In order to respond to these Duke's effort to discourage worker cooperation and Palmetto access to potential witnesses, Palmetto Alliance requested the advice and assistance of the Government Accountability Project of the Washington-based Institute for Policy Studies, a project which had established a favorable reputation for supporting "whistle blowers" at such nuclear construction projects as Zimmer and Midland. Upon learning of the evidence of quality assurance breakdowns at Catawba, the Government Accountability Project agreed to assist

and Staff of Palmetto Alliance St investigation of Catawba worker concerns and adequacy of NRC efforts in response.

On April 20 and 21, 1983, Government Accountability Project (GAP) Citizens Clinic Director, Billie Garde, and Staff Associate, Jennifer Phillips, met with Palmetto members in York and Charlotte and announced the beginning of their investigative effort. On May 4-6, Palmetto Alliance counsel met with GAP staff in Washington, D.C., to work on a review of Duke and NRC Catawba construction documents. On Friday May 6, 1983, GAP and Palmetto representatives met with Washington counsel for Applicants and with counsel for NRC Staff to discuss the Catawba investigation and a negotiated extension of discovery on Palmetto Contention 6. While these discussions were fruitful, no agreement was reached.

In response to the Board direction and approval of Palmetto depositions to be recorded by non-stenographic means, Palmetto initiated discussions leading to agreement and stipulation with both Applicants and NRC Staff for the taking of depositions during the weeks of May 9 and 16--with discovery to close as previously scheduled, Friday, May 20, 1983. Applicants and NRC Staffs agreement to make available individuals identified by each party as most knowledgeable with respect to the subject of each Palmetto contention are reflected in letters of May 5 and May 11, 1983, respectively, which have been circulated to the parties. Ultimately depositions were taken by Palmetto Alliance of eight (8) Duke Power witnesses and two (2) NRC Staff (Inspectors Bryant and Van Doorn) at Duke's Charlotte, N.C., Offices; and by

Applicants and Staff of Palmetto Alliance members Hoopingarner and McAfee, in protracted sessions extending past midnight on May 19 and 20. As Palmetto informed the Board in the conference call of May 13, 1983, it recognized the inability to adequately conclude review of the complex and rapidly developing evidence on its quality assurance contention 6; and, therefore, elected to defer its earlier noted depositions of construction/quality assurance personnel and to seek this relief from the Board.

In sum, Palmetto Alliance believes that it has demonstrated due diligence in pursuing, to the best of its ability with limited time, resources, and expertise, this complex and fast unraveling issue of serious quality assurance deficiencies at Catauba. Full and complete development of these issues for efficient consideration at hearing and fair appraisal by Palmetto of evidence supporting its claims and its adversaries' defenses requires the relief sought.

PALMETTO ALLIANCE PROPOSED PLAN AND SCHEDULE FOR DISCOVERY
ON ITS QUALITY ASSURANCE CONTENTION 6

As reflected in the proposed schedule shown at Attachment 1, Palmetto Alliance proposes that its Quality Assurance Contention 6 be scheduled for hearing to commence December 5, 1983. Such hearing would follow hearings now set to commence October 4, 1983, on Contention 6, 7, 8, 16, 27 and 44, as well as CMEC Contentions 1-4. As anticipated by the Board, hearings on yet to

be filed emergency planning contentions could well be deferred for hearing "separately later on." Board Order of February 2, 1983, at p. 9.

It is Palmetto's belief that the present schedule can accommodate hearing on these Quality Assurance issues beginning December 5, 1983, as herein proposed. To reach that December 5 date for commencement of hearings, Palmetto Alliance proposes that discovery on Contention 6 be scheduled for conclusion by October 14, 1983. Motions for Summary Disposition, if appropriate and forthcoming, could be required by October 24, 1983. Responses would follow by two weeks on November 7, 1983; rulings could be expected November 18; and prefiled testimony due November 25, 1983.

Palmetto Alliance submits that the absence of any contentions regarding the safety evaluation report (SER) and the now limited environmental contentions provide significant additional flexibility to the February 2, 1983, schedule. Palmetto submits that the nature of the quality assurance issue and the magnitude of the factual material to be digested and analyzed dictates Board adoption of the discovery deadline proposed.

The Manual for Complex Litigation utilized in the Federal courts provides valuable guidance for coping with the discovery task presented by this quality assurance contention. There discovery is cast in a first and second "wave", with the "second wave" representing "discovery on the merits:"

The first wave of discovery should be designed to disclose as far as possible (a) the names and

locations of witnesses whose written interrogatories or depositions upon oral interrogatories may be sought on the merits; (b) the existence, location, and custodian(s) of documents and other physical evidence, the production of which may be sought on the merits; and (c) information concerning the transactions upon which the claims for relief are based.

Section 1.50 Scheduling of Requests for First Wave of Discovery, Manual for Complex Litigation.

Palmetto submits that this guidance well reflects the posture of discovery now faced by this intervenor with respect to its quality assurance contention. We have indeed identified the witnesses whose depositions on the merits need be taken (a number probably in excess of 60 individuals according to counsel for Applicants. See ,May 5, 1983, letter regarding depositions). While the completeness of Applicants' and Staff's document identification and production remains significantly in doubt in light of the most recent flood of releases, this "first wave" has clearly identified a vast range of documentary evidence yet to be thoroughly analyzed. Finally, it is only now that information regarding the "transactions" material to Palmetto's quality assurance claim has been adduced. Pursuit of discovery on these transactions on the merits yet remains to be accomplished.

As the Affidavit of Billie Garde, Attachment 2, reflects, the discovery plan ahead includes significant documentary analysis as well as the critical field work with present and former Catawba workers only now beginning. As indicated, the present extent of chill on worker cooperation produced by Duke Power Company's conduct is yet to be determined.

PALMETTO SETTLEMENT EFFORTS

Counsel for Palmetto Alliance has sought through discussions with counsel for Applicants Duke Power Company and the NRC Staff to reach agreement on extending discovery on Palmetto Alliance Contention 6. As described above, counsel for Palmetto Alliance and representatives of the Government Accountability Project met with counsel for Applicants and NRC Staff in Washington, D.C., Friday, May 6, 1983. Counsel for Applicants represented that they had anticipated Palmetto's request to extend discovery on this contention and that discussion among Applicants' counsel had taken place on the subject. Applicants' counsel represented that a 60-day extension of the contention 6 discovery deadline appeared reasonable. However, Applicants insisted that the agreement to such an extension must be founded upon agreement by Palmetto to waive the pursuit of any claims arising after such date. Applicants' counsel represented that its interest was in "getting all the cards on the table" on this issue such that all the facts could be presented at trial. Counsel for the NRC Staff stated that Staff policy dictated agreement with Applicants' scheduling position, and that any extension acceptable to Applicants would be agreed to by NRC Staff. Palmetto Alliance and GAP, of course, explained that they would be obligated to respond to any evidence which came to its attention even after the end of formal discovery.

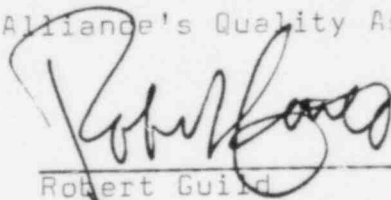
At the conclusion of the last deposition at about 12:30 a.m.

Saturday, May 21, 1983, counsel for Applicants initiated a further discussion with counsel for Palmetto on the subject of an agreed extension of time for discovery on Contention 6. Counsel for Applicants suggested an interest in pursuing settlement of the other Palmetto contentions in consideration of an agreement to extend discovery on Contention 6 as well to pursue anticipated emergency planning issues. Palmetto Alliance suggested willingness to pursue specific proposals for agreement on other Palmetto contentions, for example, a specific agreement as to placement of real-time monitors around the Catawba site. Applicants' counsel, in subsequent conversation, has declined to further pursue such discussion.

Palmetto Alliance remains willing to further pursue agreement with opposing counsel with respect to a proposed plan and schedule for discovery on its quality assurance Contention 6.

CONCLUSION

For the foregoing reasons; and on the basis of good cause shown, Palmetto Alliance respectfully requests the Board enter an Order providing for adoption of the discovery schedule herein proposed for Palmetto Alliance's Quality Assurance Contention 6.



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Counsel for Palmetto Alliance

ATTACHMENTS

1. Proposed schedule for Palmetto Alliance Contention 6.
2. Affidavit of Billie Pirner Garde--under separate cover.
3. 3/15/82 Memorandum, P.K. Van Doorn to Alderson.
4. "Hand written notes from QC and QA Inspectors which set forth their "specific problems and concerns." Item 10 of Attachment 1 to April 12, 1983, Duke Power Company letter.
5. May or June 1982 (undated) P.K. Van Doorn Memorandum to Vorse.
6. 26 April 1982 Management Assistance Company (MAC) Report.
7. Notice of Significant Licensee Meeting.
8. Grier Memorandum to File with Van Doorn Notes from Interviews, dated 12/20/82.
9. 2/1/83 Van Doorn Memorandum, closing file.
10. 5/15/83 The Charlotte Observer.
11. 5/19/83 Letters, George Johnson, Esq. to R. Guild and Felton to B. Garde, re: FOIA.

Attachment 1.

PROPOSED SCHEDULE FOR PALMETTO ALLIANCE CONTENTION 6

Discovery ends on Contention 6	October 14, 1983
Motions for Summary Disposition on Contention 6	October 24, 1983
Responses to Motions for Summary Disposition 7, 1983	November
Board Ruling on Motions for Summary Dispositions	November 18, 1983
Prefiled Testimony on Contention 6	November 25, 1983
Hearings Commence on Contention 6	December 5, 1983

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NUCLEAR REGULATORY COMMISSION

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DUKE POWER COMPANY, et al.)
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(Catawba Nuclear Station,)
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Docket Nos. 50-413
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May 25 , 1983

CERTIFICATE OF SERVICE

I hereby certify that copies of Palmetto Alliance Motion to
Establish Discovery Schedule on Its Quality Assurance Contention 6

in the above captioned matters, have been served upon the follow-
ing by depositing same in the United States mail, postage prepaid,
on this 25th day of May , 1983.

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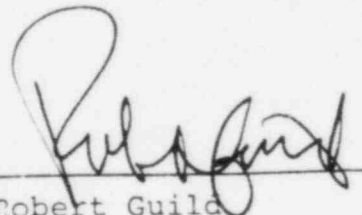
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