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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

In the Matter of)	ASLBP Nos. 78-389-03 OL
)	80-429-02 SP
CONSUMERS POWER COMPANY)	
)	Docket Nos. 50-329 OL
(Midland Plant, Units 1 and 2))	50-330 OL
)	50-329 OM
)	50-330 OM

INTERVENOR BARBARA STAMIRIS' REQUEST FOR PRODUCTION
OF DOCUMENTS TO THE NUCLEAR REGULATORY COMMISSION STAFF

TO: Nuclear Regulatory Commission Staff

Intervenor Barbara Stamiris, pursuant to the Atomic Safety and Licensing Board's Order of April 6, 1983, hereby requests the Nuclear Regulatory Commission ("Commission" or "NRC") Staff to produce and make available for inspection and/or copying each document in the possession or custody of the NRC Staff or subject to the control of the NRC Staff, its agents, or its attorneys, as requested below.

DEFINITIONS

As used herein, and unless the context otherwise requires, the terms:

(a) The Nuclear Regulatory Commission or "NRC" shall mean the Nuclear Regulatory Commission, its branches, departments, offices, sections, subdivisions, its present and former commissioners, administrators, management, employees, agents, representatives, consultants or officials, or their agents, attorneys, or representatives.

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(b) "Document" shall mean every writing of every type or description, and every other instrument or device by which, through which, or on which information has been recorded and/or preserved, including but not limited to memoranda, notes, letters, drawings, files, graphs, charts, photographs, slide presentations, handwritten notes, logs, ledgers, studies, data sheets, appointment calendars, telephone messages, voice recordings and other data compilations or other media on which or through which information of any type is transmitted, recorded or preserved.

(c) "Communication" shall mean communication, discussion, conversation, letter, memorandum, telephone call, message or direction whether written or oral, or whether in person, by telephone, or by mail.

DOCUMENTS TO BE PRODUCED

1. Any and all documents relating in any way to the special inspection conducted by the Office of Special Cases, Midland Section, concerning the diesel generator building at the Midland nuclear power plant, NRC Inspection and Enforcement Report Nos. 50-329/82-22 and 50-330/82-22, and any other investigation of systems which affect in any way the diesel generator building, including but not limited to ongoing NRC investigations. For any such ongoing NRC investigation, describe the nature and scope of the investigation.

2. Any and all documents relating in any way to communications between Region III and any other office, or branch of the NRC, or between offices, branches or divisions of the NRC, concerning (a) the reports mentioned in Document Request No. 1 above, or (b) the investigations listed in Document Request No. 1 above.

3. Any and all documents prepared by Region III in the 1980 to 1983 period which relate in any way to comparisons of the Midland nuclear power plant to other nuclear plants in terms of the following:

- (a) the number of noncompliances found by the NRC;
- (b) the number of 50.55e reports filed by Consumers Power Company ("CPC"); and
- (c) the overall rating of the Midland plant as compared to other plants in Region III and other plants under construction in the United States.

4. Any and all documents, including any technical analyses performed by or submitted to the NRC, relating to:

- (a) the NRC decision to allow underpinning work to commence in December 1982 at the Midland plant;
- (b) the NRC decision in February 1983 to allow underpinning work to be done under safety-related structures at the Midland plant; and
- (c) the NRC consideration and assessment of F.I.V.P. jacking and cracking for the period January 1983 to the present.

5. Any and all documents relating in any way to independent audits at Midland; the NRC's review acceptance criteria for these audits; and NRC actions taken in response to these audits.

6. Any and all documents relating to the special investigation initiated by the Spessard memorandum of April 19, 1982, and to issues discussed in that memorandum.

7. Any and all documents relating to the March 1982 SALP Report, and the NRC's decision to postpone the SALP Report scheduled for the Spring of 1983. If no written documents exist regarding the

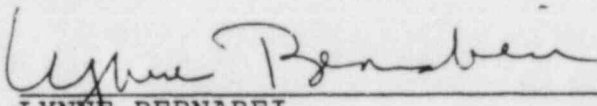
NRC's decision to postpone the 1983 SALP Report, explain the position, reasoning and recommendations of each of the following persons respecting the NRC's decision to postpone the SALP Report:

- (a) Wayne Shaffer;
- (b) Robert Warnick; and
- (c) James Keppler.

8. Confirm in writing the NRC Staff's previous representations that no documents exist which relate in any way to:

- (a) the NRC Staff's differing opinions on the enforcement action to be taken in response to the NRC Inspection and Enforcement Report Nos. 50-329/82-22 and 50-330/82-22; and
- (b) the May, August and September 1982 stop-work orders issued by CPC and the CPC decisions to lift these stop-work orders.

Respectfully submitted,



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Attorney for Intervenor Barbara Stamiris

DATED: April 7, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of:)	Docket Nos. 50-329-OL
)	50-330-OL
CONSUMERS POWER COMPANY)	50-329-OM
)	50-330-OM
(Midland Plant, Units 1 and 2))	
)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Intervenor
Barbara Stamiris' Request for Production of Documents to the
Nuclear Regulatory Commission Staff were
mailed, proper postage prepaid, this 7th day of April, 1983, to:

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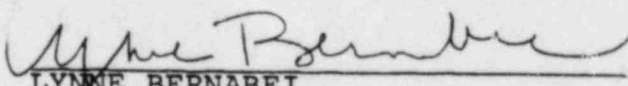
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*Delivered through NRC internal mail.