

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CONSUMERS POWER COMPANY'S  
THIRD SET OF INTERROGATORIES  
TO INTERVENOR MARY SINCLAIR

Consumers Power Company ("Consumers"), by its attorneys and pursuant to 10 C.F.R. §2.740b, requests Intervenor Mary Sinclair to answer separately and fully under oath or upon affirmation, each of the following interrogatories within 14 days of service.

INSTRUCTIONS AND DEFINITIONS

1. As used in these Interrogatories, whenever appropriate, the singular form of a word shall be interpreted as plural and the masculine gender shall be deemed to include the feminine.

2. As used in these Interrogatories, the term "and," as well as "or," shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Interrogatories any information which might

otherwise be construed to be outside their scope.

3. As used in these Interrogatories, the term "person" includes, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association, governmental body or agency.

4. As used in these Interrogatories, the term "identification" of a person or entity includes stating his, her, or its full name, his or her most recent home address and telephone number, his, her, or its most recent known business address and telephone number, his or her present position, and his, her, or its connection or association with any party to this proceeding.

5. As used in these Interrogatories, the term "identification of a document" includes stating the type of document, date, author, addressee and recipients of all copies or in the alternative, providing a copy of, or making available for copying, each such document. The term "document" means:

the original, any copies when an original is unavailable and any non-identical copies (whether different from the original because of notes made on such copies or otherwise), regardless of origin or location, of any handwritten, typewritten, printed, recorded, transcribed, punched, taped, photocopied, photostatic, "telexed", filmed, microfilmed or otherwise prepared matter, however produced or reproduced. The term document shall include all writings, drawings, graphs, charts, photographs, phonographs and other data

compilations from which information can be obtained, translated, if necessary through detection devices into reasonably usable form.

6. In answering these Interrogatories, you shall furnish such information as is available to you. The term "you" shall include any agents, attorneys or representatives.

7. If any of the information contained in the answers to these Interrogatories is not within the personal knowledge of the person signing the Interrogatory, so state and identify each person, document and communication on which he relies for the information contained in answers not solely based on his personal knowledge.

8. If you cannot answer any portion of the following Interrogatories in full, after exercising diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

9. If you claim privilege with respect to any information which is requested by these Interrogatories, specify the privilege claimed, the communication and/or answer as to which that claim is made, the parties to the communication, the topic discussed in the communication and the basis for your claim.

INTERROGATORIES

15. With respect to Sinclair Contention 1, please state the following:

- a. a concise explanation of all facts concerning quality control and quality assurance at, within or by Zack Company which facts are relied upon in support of this Contention;
- b. a concise explanation of all facts concerning quality control and quality assurance at, within or by Bechtel Power Corporation which facts are relied upon in support of this Contention;
- c. a concise explanation of all facts concerning quality control and quality assurance at, within or by Consumers Power Company which facts are relied upon in support of this Contention;
- d. a concise explanation of all facts concerning quality control and quality assurance at, within or by MPQAD which facts are relied upon in support of this Contention;
- e. identify all persons having any information or knowledge of facts relied upon in support of this Contention; and
- f. identify all documents which, either in whole or in part, are relied upon in support of this Contention.

16. With respect to Sinclair Contention 8, please state the following:

- a. a concise explanation of all facts concerning quality control and quality assurance at, within or by Zack Company which facts are relied upon in support of this Contention;
- b. a concise explanation of all facts concerning quality control and quality assurance at, within or by Bechtel Power Corporation which facts are relied upon in support of this Contention;



- c. a concise explanation of all facts concerning quality control and quality assurance at, within or by Consumers Power Company which facts are relied upon in support of this Contention;
- d. a concise explanation of all facts concerning quality control and quality assurance at, within or by MPQAD which facts are relied upon in support of this Contention;
- e. identify all persons having any information or knowledge of facts relied upon in support of this Contention; and
- f. identify all documents which, either in whole or in part, are relied upon in support of this Contention.

17. With respect to Sinclair Contention 10,

please state the following:

- a. a concise explanation of all facts concerning quality control and quality assurance at, within or by Zack Company which facts are relied upon in support of this Contention;
- b. a concise explanation of all facts concerning quality control and quality assurance at, within or by Bechtel Power Corporation which facts are relied upon in support of this Contention;
- c. a concise explanation of all facts concerning quality control and quality assurance at, within or by Consumers Power Company which facts are relied upon in support of this Contention;
- d. a concise explanation of all facts concerning quality control and quality assurance at, within or by MPQAD which facts are relied upon in support of this Contention;
- e. identify all persons having any information or knowledge of facts relied upon in support of this Contention; and

- f. identify all documents which, either in whole or in part, are relied upon in support of this Contention.

18. With respect to Sinclair Contention 11,

please state the following:

- a. a concise explanation of all facts concerning quality control and quality assurance at, within or by Zack Company which facts are relied upon in support of this Contention;
- b. a concise explanation of all facts concerning quality control and quality assurance at, within or by Bechtel Power Corporation which facts are relied upon in support of this Contention;
- c. a concise explanation of all facts concerning quality control and quality assurance at, within or by Consumers Power Company which facts are relied upon in support of this Contention;
- d. a concise explanation of all facts concerning quality control and quality assurance at, within or by MPQAD which facts are relied upon in support of this Contention;
- e. identify all persons having any information or knowledge of facts relied upon in support of this Contention; and
- f. identify all documents which, either in whole or in part, are relied upon in support of this Contention.

19. With respect to Sinclair Contention 15,

please state the following:

- a. a concise explanation of all facts concerning quality control and quality assurance at, within or by Zack Company which facts are relied upon in support of this Contention;
- b. a concise explanation of all facts concerning quality control and quality assurance at,

within or by Bechtel Power Corporation which facts are relied upon in support of this Contention;

- c. a concise explanation of all facts concerning quality control and quality assurance at, within or by Consumers Power Company which facts are relied upon in support of this Contention;
- d. a concise explanation of all facts concerning quality control and quality assurance at, within or by MPQAD which facts are relied upon in support of this Contention;
- e. identify all persons having any information or knowledge of facts relied upon in support of this Contention; and
- f. identify all documents which, either in whole or in part, are relied upon in support of this Contention.

20. With respect to Sinclair Contention 16,

please state the following:

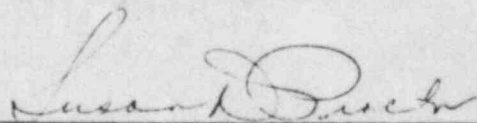
- a. a concise explanation of all facts concerning quality control and quality assurance at, within or by Zack Company which facts are relied upon in support of this Contention;
- b. a concise explanation of all facts concerning quality control and quality assurance at, within or by Bechtel Power Corporation which facts are relied upon in support of this Contention;
- c. a concise explanation of all facts concerning quality control and quality assurance at, within or by Consumers Power Company which facts are relied upon in support of this Contention;
- d. a concise explanation of all facts concerning quality control and quality assurance at, within or by MPQAD which facts are relied upon in support of this Contention;

- e. identify all persons having any information or knowledge of facts relied upon in support of this Contention; and
- f. identify all documents which, either in whole or in part, are relied upon in support of this Contention.

21. With respect to Sinclair Contention 17,  
please state the following:

- a. a concise explanation of all facts concerning quality control and quality assurance at, within or by Zack Company which facts are relied upon in support of this Contention;
- b. a concise explanation of all facts concerning quality control and quality assurance at, within or by Bechtel Power Corporation which facts are relied upon in support of this Contention;
- c. a concise explanation of all facts concerning quality control and quality assurance at, within or by Consumers Power Company which facts are relied upon in support of this Contention;
- d. a concise explanation of all facts concerning quality control and quality assurance at, within or by MPQAD which facts are relied upon in support of this Contention;
- e. identify all persons having any information or knowledge of facts relied upon in support of this Contention; and
- f. identify all documents which, either in whole or in part, are relied upon in support of this Contention.

CONSUMERS POWER COMPANY

By   
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CERTIFICATE OF SERVICE

I, SUSAN D. PEATRICK, one of the attorneys for Consumers Power Company, hereby certify that a copy of Consumers Power Company's Third Set Of Interrogatories To Intervenor Mary Sinclair was served upon all persons shown in the attached service list by deposit in the United States mail, first class, this 8th day of April, 1983.

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