

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

WASHINGTON PUBLIC POWER SUPPLY SYSTEM )  
et. al. )

Docket No. 50-460 CPA

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(WPPSS Nuclear Project No. 1) )

COALITION FOR SAFE POWER FIRST SET OF INTERROGATORIES  
TO APPLICANT DATED APRIL 14, 1983

The Coalition for Safe Power hereby serves its First Set of Interrogatories on the Washington Public Power Supply System (WPPSS) pursuant to 10 CFR 2.740b and 2.741. Each interrogatory is to be answered fully in writing, under oath or affirmation, by an officer or agent of WPPSS and is to include all pertinent information known to WPPSS. Each answer should clearly indicate the interrogatory to which it is intended to be responsive.

"WPPSS" shall include all agents, employees, attorneys, investigators and all other persons directly or indirectly subject to WPPSS's control in any way.

"Documents" means all written or recorded material of any kind or character known to WPPSS or in its possession, custody or control including, without limitation, letters, correspondence, telegrams, memoranda, notes, recorded minutes, contracts, agreements, records or notation of telephone or personal conversations or conferences, inter-office communications, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, articles, treatises, teletype messages, invoices, tape recordings, computer printouts and worksheets.

If WPPSS cannot answer any portion of the interrogatories in full, after exercising due diligence to do so, so state and answer to the extent possible, specifying the inability to answer the remainder

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and stating when expects to be able to answer the unanswered portions.

Interrogatory 1: Supply copies of "Net Billing Agreements" executed between WPPSS and the Bonneville Power Administration and "Participants".

Interrogatory 2: Supply copies of the "Exchange Agreement" executed between WPPSS, Bonneville Power Administration and the "Companies".

Interrogatory 3: Provide all documents used to support the statement made by Applicant that "the BPA recommendation concerning construction deferral at WNP-1 significantly affects the ability of the Applicant to raise capital needed for continued construction of WNP-1".

Interrogatory 4: What was the date of the last issuance of bonds for WNP-1? Had WPPSS intended to issue bonds for WNP-1 prior to the BPA recommendation? If yes, supply the date and all documents which show that such a bond sale would have been possible or impossible.

Interrogatory 5: Provide the last date WPPSS issued bonds for any of its projects and identify the project.

Interrogatory 6: Provide all documents exchanged between WPPSS, "Participants" and "Companies" concerning the delaying of WNP-1 construction.

Interrogatory 7: Provide minutes of all meetings of the WPPSS Executive Board at which the delay of WNP-1 was discussed.

Interrogatory 8: Provide all documents generated internally by WPPSS concerning the delay of WNP-1.

Interrogatory 9: Provide documents related to all options considered by WPPSS for WNP-1 between April 23 and 29, 1982.

Interrogatory 10: Explain what caused the delay by WPPSS in making an amendment to its Construction Permit Extension request to the NRC. Provide all documents generated internally by WPPSS related to this action.

Dated: 4/14/83

Signed:

Eugene Rosolie  
Eugene Rosolie, Director  
Coalition for Safe Power

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of "COALITION FOR SAFE POWER FIRST SET OF INTERROGATORIES TO APPLICANT DATED APRIL 14, 1983" in the above-captioned proceeding have been served on the following by deposit in the U.S. Mail, first class, postage prepaid on this 14th day of April, 1983.

Herbert Grossman, Chairman  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555

Glen O. Bright  
Administrative Judge  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555

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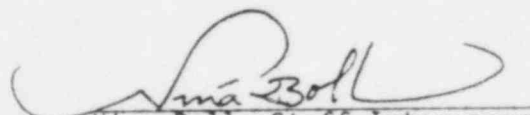
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Washington D.C. 20555

  
Nina Bell, Staff Intervenor  
Coalition for Safe Power