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May 6, 1983

BY FEDERAL EXPRESS

Charles Bechhoefer, Esq.  
Atomic Safety & Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Re: Consumers Power Company  
(Midland Plant Units 1 and 2)

Dear Judge Bechhoefer:

Through a clerical error, the subpoenas originally issued for the depositions of Lewis Clark, Thomas Devine, Billie Garde and Lucy Hallberg were sent by Federal Express to the witnesses. While we understand that the witnesses have received the subpoenas, we also understand that they intend to file a motion to quash. In order to expedite matters, we wish to achieve proper service. To that end, I enclose new subpoena forms for your signature. For your convenience, I have enclosed copies of the original application with the attached subpoenas.

Thank you for your assistance.

Very Truly yours,

*Susan D. Proctor*  
Susan D. Proctor

SDP:bc

cc: Service List

830510041B 830506  
PDR ADOCK 05000329  
G PDR

DS03

SERVICE LIST

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4625 S. Saginaw Road  
Midland, Michigan 48640

Charles Bechhoefer, Esq.  
Atomic Safety & Licensing  
Board Panel  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

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Appeal Panel  
U. S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Mr. Scott W. Stucky  
Chief, Docketing & Services  
U.S. Nuclear Regulatory Comm.  
Office of the Secretary  
Washington, D.C. 20555

Ms. Mary Sinclair  
5711 Summerset Street  
Midland, Michigan 48640

William D. Paton, Esq.  
Counsel for the NRC Staff  
U.S. Nuclear Regulatory Comm.  
Washington, D. C. 20555

Atomic Safety & Licensing  
Board Panel  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Jerry Harbour  
Atomic Safety & Licensing  
Board Panel  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Lee L. Bishop  
Harmon & Weiss  
1725 "I" Street, N.W. #506  
Washington, D.C. 20006

Ms. Lynne Bernabei  
Mr. Thomas Devine  
Mr. Louis Clark  
Government Accountability  
Project of the Institute  
for Policy Studies  
1901 Q Street, N.W.  
Washington, DC 20009



# United States of America

## NUCLEAR REGULATORY COMMISSION

In the matter of:

CONSUMERS POWER COMPANY  
(Midland Plant, Units 1 and 2)

DOCKET NO. 50-329-OM  
50-330-OM  
50-329-OL  
50-330-OL

TO Thomas Devine  
Government Accountability Project  
1901 "Q" Street, N.W.  
Washington, DC 20009

YOU ARE HEREBY COMMANDED to appear at the offices of Isham, Lincoln & Beale, 1120 Connecticut Ave., N.W., Suite 840 in the city of Washington, DC on the 23rd day of May 19 83 at 11:00 o'clock A. M. to ~~testify~~ on behalf of Government Accountability Project be deposed

in the above entitled action and bring with you the document(s) or object(s) described in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY \_\_\_\_\_  
\_\_\_\_\_

ATTORNEY FOR CONSUMERS  
POWER COMPANY  
David M. Stahl, Esq.  
Isham, Lincoln & Beale  
TELEPHONE (212) 558-7500

.....19.....

10 C.F.R. 2.720 (f)

On motion made promptly, and in any event at or before the time specified in the subpoena (or compliance by the person to whom the subpoena is directed, and on notice to the party at whose instance the subpoena was issued, the

presiding officer or, if he is unavailable, the Commission may (1) quash or modify the subpoena if it is unreasonable or requires evidence not relevant to any matter in issue, or (2) condition denial of the motion on just and reasonable

## SCHEDULE OF DOCUMENTS REQUESTED

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.

1. All statements and/or affidavits given by the deponent to any person or entity relating in any way to Zack Company, to Consumers Power Company or to quality control/quality assurance for Consumers' Midland Nuclear Power Plant.

2. All documents relating in any way to Zack Company, to Consumers Power Company or to quality control/quality assurance for Consumers' Midland Nuclear Power Plant.

# United States of America

## NUCLEAR REGULATORY COMMISSION

In the matter of:

CONSUMERS POWER COMPANY  
(Midland Plant, Units 1 and 2)

DOCKET NO. 50-329-OM  
50-330-OM  
50-329-OL  
50-330-OM

TO Lewis Clark  
Government Accountability Project  
1901 "Q" Street, N.W.  
Washington, DC 20009

YOU ARE HEREBY COMMANDED to appear at the offices of Isham, Lincoln & Beale, 1120 Connecticut Ave., N.W., Suite 840 in the city of Washington, DC on the 16th day of May 1983 at 11:00 O'clock A. M. to testify on behalf of Government Accountability Project be deposed

in the above entitled action and bring with you the document(s) or object(s) described in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY \_\_\_\_\_

ATTORNEY FOR CONSUMERS  
POWER COMPANY  
David M. Stahl, Esq.  
Isham, Lincoln & Beale  
TELEPHONE (312) 558-7500

.....19.....

10 C.F.R. 2.720 (f)

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2. All documents relating in any way to Zack Company, to Consumers Power Company or to quality control/quality assurance for Consumers' Midland Nuclear Power Plant.

# United States of America

## NUCLEAR REGULATORY COMMISSION

In the matter of:

CONSUMERS POWER COMPANY  
(Midland Plant, Units 1 and 2)

TO Billie Garde  
Government Accountability Project  
1901 "Q" Street, N.W.  
Washington, DC 20009

DOCKET NO.

50-329-OM  
50-330-OM  
50-329-OL  
50-330-OL

YOU ARE HEREBY COMMANDED to appear at the offices of Isham,  
Lincoln & Beale, 1120 Connecticut Ave., N.W., Suite 840  
in the city of Washington, DC  
on the 6th day of June 1983 at 11:00 o'clock A. M.  
to ~~verify~~ on behalf of Government Accountability Project  
be deposed

in the above entitled action and bring with you the document(s) or object(s) described  
in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY \_\_\_\_\_

ATTORNEY FOR CONSUMERS  
POWER COMPANY  
David M. Stahl, Esq.  
Isham, Lincoln & Beale  
TELEPHONE (312) 558-7500

.....19.....

10 C.F.R. 2.720 (f)

On motion made promptly, and in any event  
at or before the time specified in the subpoena  
for compliance by the person to whom the sub-  
poena is directed, and on notice to the party at  
whose instance the subpoena was issued, the

presiding officer or, if he is unavailable, the  
Commission may (1) quash or modify the sub-  
poena if it is unreasonable or requires evidence  
not relevant to any matter in issue, or (2) con-  
dition denial of the motion on just and reasonable  
terms.

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2. All documents relating in any way to Zack Company, to Consumers Power Company or to quality control/quality assurance for Consumers' Midland Nuclear Power Plant.



# United States of America

## NUCLEAR REGULATORY COMMISSION

In the matter of:

CONSUMERS POWER COMPANY  
(Midland Plant, Units 1 and 2)

TO Ms. Lucy Hallberg  
3819 Chestnut Hill  
Midland, Michigan 48640

DOCKET NO. 50-329-OM  
50-330-OM  
50-329-OL  
50-330-OL

YOU ARE HEREBY COMMANDED to appear Consumers Power Company Midland  
Service Center, 1100 Washington Street

in the city of Midland, Michigan  
on the 21st day of June 19 83 at 11:00 O'clock A. M.  
to ~~appear~~ on behalf of Government Accountability Project  
be deposed

in the above entitled action and bring with you the document(s) or object(s) described  
in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY \_\_\_\_\_  
\_\_\_\_\_

ATTORNEY FOR CONSUMERS  
POWER COMPANY  
David M. Stahl, Esq.  
Isham, Lincoln & Beale  
TELEPHONE (312) 558-7500

\_\_\_\_\_, 19\_\_\_\_

10 C.F.R. 2.720 (f)

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Commission may (1) quash or modify the sub-  
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2. All documents relating in any way to Zack Company, to Consumers Power Company or to quality control/quality assurance for Consumers' Midland Nuclear Power Plant.