

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
ARIZONA PUBLIC SERVICE COMPANY)
(Palo Verde Nuclear Generating)
Station, Units 2 and 3))

Locket Nos. STN 50-529
50-530

WEST VALLEY AGRICULTURAL PROTECTION COUNCIL, INC.'S
MOTION FOR MODIFICATION OF DISCOVERY SCHEDULE

On March 23, 1983, the Licensing Board set a schedule for discovery in this proceeding in accordance with the Stipulation on discovery submitted on March 9, 1983, by the West Valley Agricultural Protection Council, Inc. ("West Valley"), the Arizona Public Service Company, et al. ("Joint Applicants"), and the Nuclear Regulatory Commission Staff.

As set out more fully in the attached Memorandum, the timing of discovery in this proceeding is keyed largely to the completion and distribution of the study recently begun by the University of Arizona on Joint Applicants' behalf to examine the effects of salt deposition on crops grown in the vicinity of the Palo Verde Nuclear Generating Station ("PVNGS"). Since the Crop Study proposal, which was not provided to West Valley until after entry of the Board's March 23, 1983 Memorandum and Order, states that the expected completion date (mid December 1983) is at least six weeks later than the date identified in the Stipulation (on or about November 1, 1983), West Valley requests that the Board modify the discovery schedule to take the delay into account.* /

* / A copy of the relevant page of the Crop Study is attached as Exhibit 1.

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First, West Valley requests that depositions in this proceeding, now scheduled to begin on July 18, 1983, be rescheduled to begin six weeks later, on August 29, 1983. The deposition schedule would therefore provide as follows:

- a) August 29 through September 2
Depositions noticed by West Valley
- b) September 5 through September 9
Depositions noticed by Joint Applicants
- c) September 19 through September 23
Depositions noticed by West Valley
- d) September 26 through September 30
Depositions noticed by Joint Applicants
- e) . October 10 through October 14
Depositions noticed by West Valley
- f) October 17 through October 21
Depositions noticed by Joint Applicants
- g) October 31 through November 4
Depositions noticed by West Valley
- h) November 7 through November 11
Depositions noticed by Joint Applicants
- i) November 21 through November 25
Depositions noticed by West Valley
- j) November 28 through December 2
Depositions noticed by Joint Applicants
- k) December 12 through December 16
Depositions noticed by West Valley

Second, West Valley requests rescheduling of discovery concerning the Crop Study, currently set to begin on November 7, 1983, and to conclude on January 6, 1984, to begin on or about December 20, 1983, or upon production of the Crop Study and related documents, whichever is later, and to conclude three months after that time. In addition to the two months contemplated under the present Order for discovery relating to the Crop Study, West Valley will require an additional month for its attorney and experts to analyze the large quantities of data that the study is expected to produce.

As contemplated under the present Order, filing of pre-trial testimony and exhibits will occur nine days after completion of discovery and the evidentiary hearing will begin one month later.

Respectfully submitted

Dated: _____

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Table 2. Time-Task-Report Schedule

Activity	Month									
	M	A	M	J	J	A	S	O	N	D
Group Meeting with Legal Staff and Consultants	●									
Task I - Determination of salt accumulation thresholds on crop production										
• Prepare greenhouse and field plots	—									
• Assemble pots, mix, and salt chamber	—									
• Plant cotton, alfalfa and barley	—									
• Salt treatment		—	—	—	—	—	—	—		
• Plant evaluations			—	—	—	—	—	—	—	
• Analyze data				—	—	—	—	—	—	—
• Prepare report		●	●	●	●	●	●	●	●	▲
Task II - Review of Program Program		●	—	●						

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 Meetings or Monthly Reports

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 Final Report