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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)
)
WASHINGTON PUBLIC POWER)
SUPPLY SYSTEM) Docket No. 50-460-CPA
)
(WPPSS Nuclear Project No. 1))

LICENSEE'S SECOND SET OF
INTERROGATORIES AND REQUESTS
TO PRODUCE TO INTERVENOR

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, the
Washington Public Power Supply System ("Licensee") hereby
serves Licensee's Second Set of Interrogatories and
Requests to Produce upon the Coalition for Safe Power
("intervenor").

Each interrogatory shall be answered fully in writ-
ing, under oath, or affirmation, and include all pertinent
information known to intervenor, its officers, directors
or members as well as any pertinent information known to
its employees, advisors, representatives or counsel. Each
request to produce applies to pertinent documents which
are in the possession, custody or control of intervenor,
its officers, directors or members as well as its
employees, advisors, representatives or counsel. In
answering each interrogatory and in responding to each

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request, recite the interrogatory or request preceding each answer or response. Also identify the person providing each answer or response.

These interrogatories and requests shall be continuing in nature. Thus, any time intervenor obtains information which renders any previous response incorrect or indicates that a response was incorrect when made, intervenor should supplement its previous response to the appropriate interrogatory or request to produce. Intervenor should also supplement its response as necessary with respect to identification of each person expected to be called at the hearing as a witness, the subject matter of his or her testimony and the substance of that testimony. Licensee is particularly interested in the names and areas of expertise of intervenor witnesses, if any. Identification of such witnesses is necessary if Licensee is to be afforded adequate time to depose them. The term "documents" shall include any writings, drawings, graphs, charts, photographs and other data compilations from which information can be obtained. Licensee requests that at a date or dates to be agreed upon, intervenor make available for inspection and copying all documents subject to the requests set forth below.

REQUESTS FOR DOCUMENTS

Pursuant to 10 C.F.R. § 2.741, Licensee requests intervenor by and through its representative or attorney to make available for inspection and copying at a time and location to be designated, any and all documents identified in the responses to the Licensee's interrogatories below including, but not limited to:

- (1) any written record of any oral communication between or among intervenor, its advisors, consultants, representative, and/or any other persons, including but not limited to the NRC Staff, the Licensee, and their advisors, consultants, agents, and/or any other persons; and
- (2) any documents, correspondence, letters, memoranda, notes, diagrams, reports, charts, photographs, or any other writing, including but not limited to work papers, prior drafts, and notes of meetings.

If intervenor maintains that some documents should not be made available for inspection, it should specify the documents and explain why such are not being made available. This requirement extends to any such documents, described above, in the possession of intervenor, its advisors, consultants, representatives, or attorney.

Licensee notes that in response to Interrogatories 7, 18, 19 and 23 of Licensee's First Set of Interrogatories, intervenor identified several documents which, pursuant to Licensee's initial requests for documents, should have

been made available as set forth above. To date, intervenor has failed to satisfy this obligation. Accordingly, Licensee hereby renews its request that such documents be provided.

INTERROGATORIES

Pursuant to 10 C.F.R. § 2.740b, Licensee requests intervenor by and through its representative or attorney to answer separately and fully in writing, under oath or affirmation, by persons having knowledge of the information requested, the following interrogatories.

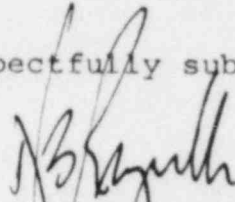
1. State the full name, address, occupation and employer of each person answering the interrogatory and designate the interrogatory or the part thereof he or she answered.
2. Identify each and every person you are considering calling as a witness in the event a hearing is held in this proceeding and with respect to each of these witnesses:
 - a. State the substance of the facts and opinions to which the witness is expected to testify.
 - b. Give a summary of the grounds for each opinion; and
 - c. Describe the witness's educational and professional background.
3. In response to Interrogatory 17 of Licensee's First Set of Interrogatories, you set forth a number of reasons why you believe WNP-1 was deferred. Are they the only reasons you contend that WNP-1 was deferred?

4. If your response to Interrogatory 3 is no, state all other reasons you contend that WNP-1 was deferred.
5. Of the reasons identified in Interrogatory 4, state which (if any) of those reasons were the principle reasons why you contend that WNP-1 was deferred.
6. What are the bases for your responses to Interrogatories 3, 4 and 5?
7. State what you believe are the functions of the Bonneville Power Administration ("BPA").
8. State what you believe are the functions of the Licensee.
9. Provide the bases for your response to Interrogatories 7 and 8.
10. State what you believe is the extent, if any, to which BPA oversees and/or approves development and implementation of Licensee's construction budget for WNP-1.
11. State what you believe is the extent, if any, to which BPA oversees and/or approves development and implementation of Licensee's construction activities for WNP-1.
12. Do you contend that Licensee should have continued the construction of WNP-1, notwithstanding the BPA recommendation to defer its construction for an additional two to five years?
13. If the answer to Interrogatory 12 is yes, explain fully what sources of funding you believe were available to support continued construction.
14. If the answer to Interrogatory 12 is no, explain whether in your opinion Licensee had a valid business purpose in deferring construction.

15. Provide the complete basis for your responses to Interrogatories 12, 13 and 14.
16. In response to Interrogatories 20, 21 and 22 of Licensee's First Set of Interrogatories you stated what you meant by the term "reasonable period of time," what factors should be considered when determining if a requested construction permit is for a "reasonable period of time" and what would constitute a "reasonable period of time" in the case of WNP-1. On June 22, 1983, you set forth in your Response to Licensee's Motion to Compel the basis for your responses to those interrogatories and stated that you would again update your response. Provide that updated response.
17. Identify what obstacles exist in your opinion to financing WNP-1, the time needed for each obstacle to be overcome, and what must occur for each obstacle to be overcome.
18. Provide the complete basis for your response to Interrogatory 17.
19. Do you contend that Licensee must demonstrate that WNP-1 will in fact be completed within the period provided for in the two to five year extension of its construction?
20. Provide the complete basis for your response to Interrogatory 19.
21. Do you contend there has been a misallocation of funds on the WNP-1 and 4 projects such that funds will have to be repaid by the WNP-1 project to the WNP-4 project?
22. If the answer to Interrogatory 21 is yes, state the amount of the misallocation and identify the effect, if any, it would have on the construction of WNP-1.

23. Provide the complete basis for your response to Interrogatories 21 and 22.
24. Identify all documents in your possession obtained from BPA concerning the delay of WNP-1 and state when and from whom you obtained each of these documents.
25. Identify all documents in your possession obtained from any source other than BPA concerning the delay of WNP-1 and state when and from whom you obtained each of these documents.

Respectfully submitted,



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202/857-9817

Counsel for Licensee

August 12, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
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WASHINGTON PUBLIC POWER)	Docket No. 50-460-CPA
SUPPLY SYSTEM)	
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(WPPSS Nuclear Project No. 1))	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing
"Licensee's Second Set of Interrogatories and Requests to
Produce to Intervenor" in the captioned matter were served
upon the following persons by deposit in the United States
mail, first class, postage prepaid, this 12th day of
August, 1983:

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

Mr. Glenn O. Bright
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Dr. Jerry Harbour
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Chairman, Atomic Safety and
Licensing Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mitzi A. Young, Esq.
Office of the Executive
Legal Director
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Washington, D.C. 20555

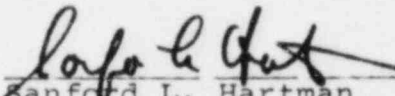
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