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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

Public Service Electric and)
Gas Company)
(Hope Creek Generating) Docket No. 50-354-OL
Station))

APPLICANTS' PRELIMINARY SET OF INITIAL
INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS TO THE PUBLIC ADVOCATE AND
AND THE STATE OF DELAWARE

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R. §2.740b, and the Atomic Safety and Licensing Board's Special Prehearing Conference Order (December 21, 1983) (slip op. at 19-20), Public Service Electric and Gas Company, et al ("Applicants") hereby propound the following preliminary interrogatories to the Public Advocate of the State of New Jersey and the State of Delaware to be answered fully in writing, under oath, and to be served on Applicants on or before January 18, 1984.

Additionally, pursuant to 10 C.F.R. §2.741, Applicants request that intervenors produce for inspection and copying (or provide copies of) the documents requested below.

These requests are preliminary in nature in order to ascertain the identity of those deponents who will be examined by Applicants in accordance with the Licensing

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Board's Special Prehearing Conference Order. Further interrogatories and document requests will be made subsequently as to specific contentions.

Interrogatories

1. State whether you intend to present any expert witnesses on the subject matter at issue in Contentions 1 through 4. If so, identify each such expert witness and further state (a) his professional qualifications; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is expected to testify; (d) the grounds for each opinion; (e) the expert's business and residential addresses. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this (these) subject(s).

2. State whether you intend to present any fact witnesses on the subject matter at issue in Contentions 1 through 4. If so, identify each such fact witness and further state (a) his business and residential addresses; (b) the subject matter on which the witness is expected to testify; (c) the substance of the factual testimony which the witness is expected to offer.

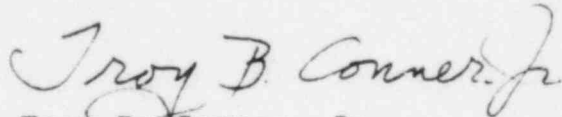
3. Identify by title, author, publisher and date of issuance or publication, all documents that you rely upon as a basis for your contentions or that you intend to use (by way of reference or evidentiary proffer) in presenting your direct case on Contentions 1 through 4 and all documents to

which you intend to refer in conducting cross-examination of other witnesses who may testify in connection with any such contentions.

Document Request

Please attach to your answer(s) to the interrogatories listed above a copy of all documents identified in the answers above, or upon which you otherwise intend to rely in the presentation of your direct case or in the cross-examination of other witnesses. Alternatively, state that all such documents will be produced at a reasonable time and place to be agreed upon by the Applicant for inspection and copying.

CONNER & WETTERHAHN, P.C.

A handwritten signature in cursive script that reads "Troy B. Conner, Jr.".

Troy B. Conner, Jr.
Counsel for the Applicant

January 3, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Public Service Electric and)
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Station))

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Preliminary Set of Initial Interrogatories and Request for Production of Documents to the Public Advocate and the State of Delaware," dated January 3, 1984 in the captioned matter has been served upon the following by deposit in the United States mail this 3rd day of January, 1984:

Marshall E. Miller
Chairman
Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Peter A. Morris
Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Theodore C. Granger
Deputy Public Advocate
Department of the Public
Advocate
Division of Rate Counsel
744 Broad Street
30th Floor
Newark, New Jersey 07102

Atomic Safety and
Licensing Appeal Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

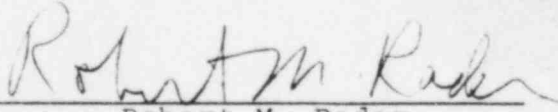
Docketing and Service
Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Richard J. Goddard, Esq.
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Richard Fryling, Jr., Esq.
Associate General Counsel
Public Service Electric &
Gas Company
P.O. Box 570 (T5E)
Newark, NJ 07101

R. William Potter, Esq.
Susan C. Remis, Esq.
State of New Jersey
Department of the Public
Advocate
CN 850
Trenton, New Jersey 08625

* Carol Delaney, Esq.
Deputy Attorney General
Department of Justice
State Office Building
8th Floor
820 N. French Street
Wilmington, DE 19810


Robert M. Rader

* Federal Express