

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of )  
DUKE POWER COMPANY, et al. )  
(Catawba Nuclear Station )  
Units 1 and 2) )

Docket No. 50-413  
50-414

APPLICANTS' MOTION FOR PROTECTIVE ORDER

Duke Power Company, et al. (Applicants), pursuant to 10 CFR 2.70 (c), request the Atomic Safety and Licensing Board to issue an order to protect Applicants from being required to respond further to "Palmetto Alliance and Carolina Environmental Study Group's Interrogatories and Requests To Produce Documents on Diesel Generator Contentions to Applicants and NRC Staff" and "CESG's Interrogatories to Duke Power Regarding Emergency Diesel Contentions Admitted by Atomic Safety and Licensing Board", filed March 19, 1984.

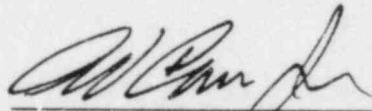
Applicants have responded to the referenced Interrogatories by providing all information, not otherwise privileged or objectionable, relevant to the subject matter of Intervenor's contention regarding the Catawba diesel generator crankshaft and the Board's diesel generator contention. Intervenor's Interrogatories, however, are overly broad and seek, in numerous instances, information which either is privileged or is not relevant to the subject matter of the contentions. Applicants have set out in their Response to Intervenor's Interrogatories their objections to specific interrogatories and the grounds therefore, and incorporate such herein by reference.

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On the grounds set forth in their objections, Applicants move this Licensing Board to issue an order which will protect them from being required to provide information in response to Intervenor's Interrogatories beyond that already furnished. For Applicants to provide such information would require them to divulge information which either is privileged or is not relevant to the subject matter of the contention. In any case, to produce such information would subject Applicants to annoyance, embarrassment, oppression, undue burden or expense.

Therefore, for the reasons set forth above, Applicants request this Licensing Board to issue an order which protects Applicants from providing any information beyond that already provided in Applicants' April 2 Responses.

Respectfully submitted,



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April 4, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Motion For Protective Order" in the above captioned matter have been served upon the following in the above captioned matter have been served upon the following by deposit in the United States mail this 4th day of April, 1984.

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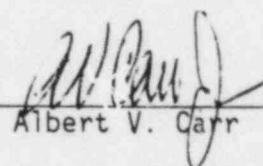
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