

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'84 JUL -9 M138

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
Gulf States Utilities Company,	)	Docket Nos. 50-458
<u>et al.</u>	)	50-459
	)	
(River Bend Station, Units 1 and 2)	)	

APPLICANTS' MOTION TO COMPEL  
STATE OF LOUISIANA AND JOINT INTERVENORS  
TO RESPOND TO APPLICANTS' INTERROGATORIES  
ON SAFETY CONTENTIONS 1 & 2

Pursuant to Sections 2.730(h) and 2.740(f) of the Commission's Rules of Practice, Gulf States Utilities Company, et al., ("Applicants") move to compel the State of Louisiana and Joint Intervenors to respond to Applicants' interrogatories on safety contentions 1 & 2, dated June 5, 1984.<sup>1/</sup> To summarize, Applicants' interrogatories requested that the State of Louisiana and Joint Intervenors identify the factual and expert witnesses and the documents on which they intend to rely at the hearings, scheduled to commence on October 10, 1984.<sup>2/</sup> The interrogatories further requested that the State of Louisiana and Joint Intervenors provide

1/ Applicants' First Set of Interrogatories And Request For Production Of Documents To State Of Louisiana And Joint Intervenors On Safety Contentions 1 & 2 (June 5, 1984).

2/ Gulf States Utilities Company (River Bend Station, Units 1 and 2), Docket Nos. 50-458 and 50-459, "Memorandum" (June 22, 1984).

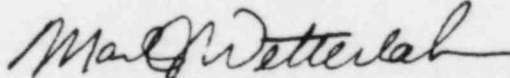
the substantive information on which Contentions 1 & 2 are based.

In accordance with 10 CFR § 2.740b(b), responses to Applicants' interrogatories were due to be filed on June 25, 1984. To date, neither the State of Louisiana nor Joint Intervenors has responded in any way.

Accordingly, Applicants move that the State of Louisiana and Joint Intervenors be compelled to respond to Applicants' June 5, 1984 interrogatories.

Respectfully submitted,

CONNER & WETTERHAHN, P.C.

A handwritten signature in dark ink, appearing to read "Mark J. Wetterhahn", with a long horizontal flourish extending to the right.

Mark J. Wetterhahn  
Jessica H. Lavery  
Counsel for Applicants

July 5, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
GULF STATES UTILITIES	)	Docket Nos. 50-458 OL
COMPANY, <u>et al.</u>	)	50-459 OL
	)	
(River Bend Station, Unit 1	)	
and 2	)	

SERVICE LIST

I hereby certify that copies of "Applicants' Motion to Compel State of Louisiana and Joint Intervenor to Respond to Applicants' Interrogatories on Safety Contentions 1 & 2," dated July 3, 1984 in the captioned matter, have been served upon the following by deposit in the United States mail this 5th day of July, 1984:

B. Paul Cotter, Jr., Esq.  
Chairman, Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Judge Gustave A. Linenberger  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. Richard F. Cole  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Lee S. Dewey, Esq.  
Richard J. Goddard, Esq.  
Counsel for NRC Staff  
Office of the Executive  
Legal Director  
U.S. Nuclear Regulatory  
Commission Washington,  
D.C. 20555

James W. Pierce, Jr., Esq.  
P. O. Box 23571  
Baton Rouge, LA 70893

Stephen M. Irving, Esq. 355  
Napoleon Street Baton  
Rouge, LA 70802

Mr. David Zaloudek  
Nuclear Energy Division  
Louisiana Department of  
Environmental Quality  
P.O. Box 14690  
Baton Rouge, LA 70898

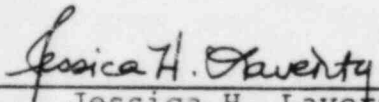
Docketing & Service Section  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

J. David McNeill, III  
Nuclear Energy Division  
Louisiana Department of  
Environmental Quality  
P.O. Box 14690  
7434 Perkins Road  
Baton Rouge, LA 70898

Linda B. Watkins, Esq.  
355 Napoleon Street  
Baton Rouge, LA 70802

Brian P. Cassidy, Esq.  
Regional Counsel,  
Region I  
Federal Emergency Management  
Agency  
J.W. McCormack POCH  
Boston, MA 02109

Gulf States Utilities  
Company  
Attn: Mr. James E. Booker  
Manager - Engineering  
and Licensing  
P. O. Box 2951  
Beaumont, Texas 77704

  
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Jessica H. Lavery