

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
U.S. NUCLEAR REGULATORY COMMISSION

In the Matter of )

) Docket No. 40-2061-ML

KERR-McGEE CHEMICAL CORPORATION )

(West Chicago Rare Earths Facility) )

DOCKETED  
USNRC

'85 JUL -2 A10:45

PEOPLE'S SUPPLEMENT TO RESPONSES TO  
KERR-McGEE'S SECOND SET OF INTERROGATORIES

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

The People herewith attach the affidavits verifying their responses, filed May 20, 1985 to Kerr-McGee's Second Set of Interrogatories.

PEOPLE OF THE STATE OF ILLINOIS

NEIL F. HARTIGAN  
Attorney General  
State of Illinois

BY: 

ANNE RAPKIN  
Assistant Attorney General  
Environmental Control Division

ANNE RAPKIN  
JAMES CARROLL  
JAMES COGHLAN  
JOHN PERCONTI  
Assistant Attorneys General  
RUSSELL R. EGGERT  
Assistant Attorney General  
Administrative Assistant  
100 W. Randolph Street  
Chicago, Illinois 60601  
[312] 917-2512

DATED: June 27, 1985

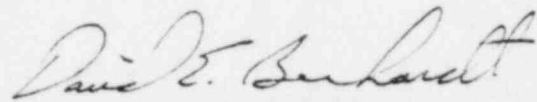
8507030649 850627  
PDR ADOCK 04002061  
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D503

STATE OF UTAH           )  
                              ) SS.  
COUNTY OF SALT LAKE )

A F F I D A V I T

I, DAVID E. BERNHARDT, being on oath sworn do state  
that I prepared the answers, or parts thereof, to the fore-  
going Interrogatories 29, 30, 31, 33, 34, 37, 38, 39, 40, 87, 60,  
88, 89, and 91, and they are true to the best of my knowledge,  
information, and belief.



\_\_\_\_\_  
DAVID E. BERNHARDT


SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 24 DAY  
OF June, 1985.

  
\_\_\_\_\_  
NOTARY PUBLIC

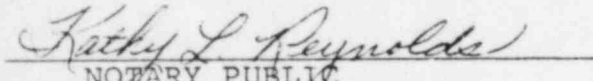
STATE OF ILLINOIS     )  
                              )   SS.  
COUNTY OF SANGAMON )

A F F I D A V I T

I, JOHN COOPER, being on oath sworn do state that I prepared the answers, or parts thereof, to the foregoing Interrogatories 6, 23, 26, 32, 35, 68, 69, 70, 72, 73, 75, 76, 90, and 112, and that they are true to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
JOHN COOPER

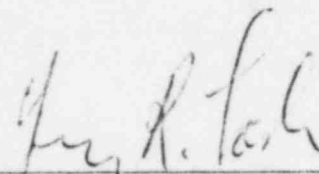
SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 11<sup>th</sup> DAY  
OF June, 1985.

  
\_\_\_\_\_  
NOTARY PUBLIC


STATE OF ILLINOIS    )  
                          )  SS.  
COUNTY OF SANGAMON )

A F F I D A V I T

I, TERRY R. LASH, being on oath sworn do state that I prepared the answer, or parts thereof, to the foregoing Interrogatory 64, and that it is true to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
TERRY R. LASH

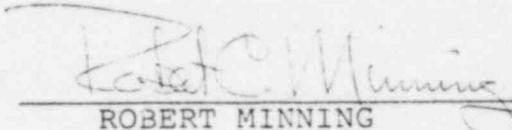
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BEFORE ME THIS 17<sup>th</sup> DAY  
OF June, 1985.

  
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NOTARY PUBLIC

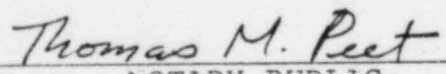
STATE OF MICHIGAN     )  
                              )   SS.  
COUNTY OF INGHAM     )

A F F I D A V I T

I, ROBERT MINNING, being on oath sworn do state that  
I prepared the answers, or parts thereof, to the foregoing  
Interrogatories 5, 69, 70, 74, 75, 76, 79, 82, 104, and 109,  
and that they are true to the best of my knowledge, information,  
and belief.

  
\_\_\_\_\_  
ROBERT MINNING

SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 18<sup>TH</sup> DAY  
OF JUNE, 1985.  
INGHAM COUNTY, MICHIGAN

  
\_\_\_\_\_  
NOTARY PUBLIC

THOMAS M. PEET  
Notary Public, Ingham Co., MI  
My Commission Expires May 11, 1986


STATE OF ILLINOIS   )  
                          )   SS.  
COUNTY OF COOK     )

A F F I D A V I T

I, MICHAEL HURST, being sworn on oath do state that I prepared the answers, or parts thereof, to the foregoing Interrogatories 24 and 35, and that they are true and correct to the best of my knowledge, information, and belief.

  
MICHAEL HURST

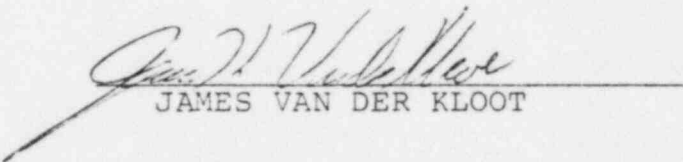
SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 7TH DAY  
OF JUNE, 1985.

  
NOTARY PUBLIC

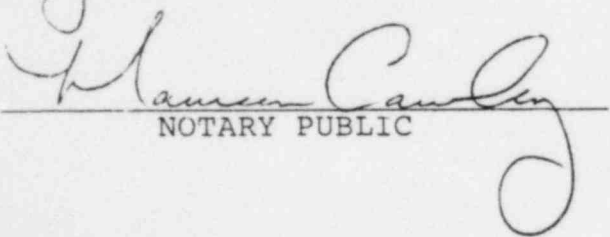
STATE OF ILLINOIS    )  
                              )   SS.  
COUNTY OF COOK        )

A F F I D A V I T

I, JAMES VAN DER KLOOT, being on oath sworn do state that I prepared the answers, or parts thereof, to the foregoing Interrogatories 1, 2, 3, 9, 10, 41, 42, 43, 44, 53, 61, 62, 66, 67, 68, 69, 77, 78, 80, 81, 92, 97, 103, 108, 110, 111, 113, and 116, and that they are true to the best of my knowledge, information, and belief.

  
JAMES VAN DER KLOOT

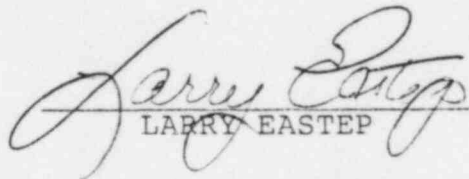
SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 7<sup>th</sup> DAY  
OF June, 1985.

  
NOTARY PUBLIC

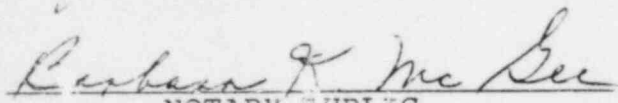
STATE OF ILLINOIS    )  
                              )   SS.  
COUNTY OF SANGAMON   )

A F F I D A V I T

I, LARRY EASTEP, being on oath sworn do state that I prepared the answer, or parts thereof, to the foregoing Interrogatory 65, and that it is true to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
LARRY EASTEP

SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 7th DAY  
OF June, 1985.

  
\_\_\_\_\_  
NOTARY PUBLIC



RELATED CORRESPONDENCE

PROOF OF SERVICE

DOCKETED  
USNRC

1, ELAINE C. THOMAS, having been sworn and under oath  
do state that I have this 27th day of June, 1985 served copies <sup>'85 JUL -2 A10:45</sup>  
of the foregoing People's Supplement To Responses To Kerr-McGee's  
Second Set Of Interrogatories upon the persons listed on the <sup>OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH</sup>  
attached Service List by placing same in envelopes addressed to  
said persons, by first class mail, postage prepaid, and depositing  
same with the United States Postal Service located at 160 North  
LaSalle Street, Chicago, Illinois 60601.

Elaine C. Thomas

SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 27TH DAY  
OF JUNE, 1985.

\_\_\_\_\_  
NOTARY PUBLIC

SERVICE LIST

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