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

In the Matter of)
KERR-McGEE CHEMICAL CORPORATION)
(West Chicago Rare Earths Facility))

Docket No. 40-2061-ML

DOCKETED
USNRC

'85 MAY 28 A11:16

PEOPLE OF THE STATE OF ILLINOIS' REQUEST
TO KERR-McGEE TO UPDATE DOCUMENT PRODUCTION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

This is the People's request to Kerr-McGee for updated document production. All instructions and definitions are the same as those set out in the People's first, second, and third discovery requests. Unless otherwise agreed upon by the parties, documents should be produced within 30 days at the Office of the Attorney General, Environmental Control Division, 100 W. Randolph Street, 13th Floor, Chicago, Illinois 60601.

Kerr-McGee is requested to produce all documents responsive to the People's first (July 13, 1984) and second (November 27, 1984) discovery requests, which documents have been generated since the last production was made. Such documents include but are not limited to all sampling data and all related

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information and materials associated with Kerr-McGee's sampling efforts which began in approximately September 1984.

PEOPLE OF THE STATE OF ILLINOIS

NEIL F. HARTIGAN
Attorney General
State of Illinois

BY: 

ANNE RAPKIN
Assistant Attorney General
Environmental Control Division

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DATED: May 22, 1985

PROOF OF SERVICE

I, ELAINE C. THOMAS, having been sworn and under oath do state that I have this 22nd day of May, 1985 served copies of the foregoing People Of The State Of Illinois' Request To Kerr-McGee To Update Document Production upon the persons listed on the attached Service List by placing same in envelopes addressed to said persons by first class mail, postage prepaid, except for Peter J. Nickles and Richard A. Meserve at Covington & Burroughs which was sent by Express Mail, and depositing all with the United States Postal Service located at 160 North LaSalle Street, Chicago, Illinois 60601.

DOCKETED
USNRC

85 MAY 28 AM 11:16

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

SUBSCRIBED AND SWORN TO
BEFORE ME THIS 22ND DAY
OF MAY, 1985.

NOTARY PUBLIC

SERVICE LIST

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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