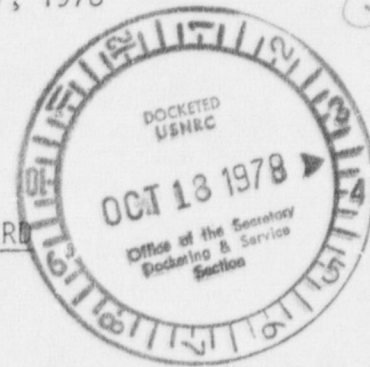


October 17, 1978

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

OHIO EDISON COMPANY, et al.

(Erie Nuclear Plant,
Units 1 and 2)Docket Nos. STN 50-580
STN 50-581NRC STAFF MOTION FOR AN ORDER COMPELLING INTERVENORS EVELYN STEBBINS
AND COALITION FOR SAFE ELECTRIC POWER TO RESPOND TO STAFF INTERROGATORIES

On September 1, 1978, the NRC Staff served upon the subject intervenors written interrogatories relating to their contention number 25 relating to ATWS. As of the date of this motion, the intervenors have not in any way responded to the ATWS interrogatories. The Staff notes that this is not the first time that these intervenors have failed to respond to discovery. The Board's Order of April 20, 1978, dismissed twelve contentions for failure to respond to discovery.

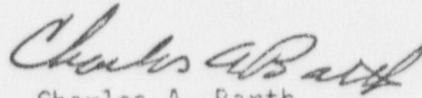
The Staff's interrogatories sought to determine the intervenors' position regarding contention 25 and the basis thereof. That contention merely asserts that the potential for common mode failure requires two separate shutdown systems utilizing diverse principles and components. Unless the Staff is provided information as to the basis which supports the intervenors'

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assertions and what the diverse systems are which intervenors propose, the Staff cannot meaningfully address the contention.

10 CFR §2.740(f) provides for an order compelling response to interrogatories and the Staff thus moves now for an Order directing the intervenors to respond within 10 calendar days to the Staff's interrogatories dated September 1, 1978.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Charles A. Barth".

Charles A. Barth
Counsel for NRC Staff

Dated at Bethesda, Maryland,
this 17th day of October, 1978.

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. STN 50-580
STN 50-581

Charles A Barth
Charles A. Barth
Counsel for NRC Staff