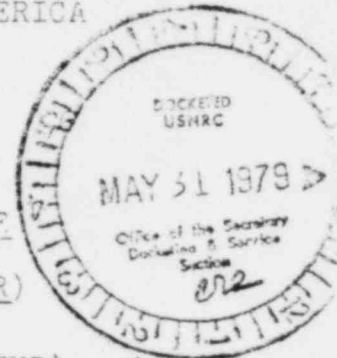


NRC PUBLIC DOCUMENT ROOM

RE: APPLICATION OF TEXAS I BEFORE THE  
UTILITIES GENERATING COMPANY I NUCLEAR REGULATORY COMMISSION  
FOR AN OPERATING LICENSE I OF THE UNITED STATES  
FOR COMANCHE PEAK STEAM I OF AMERICA  
ELECTRIC STATION UNITS 1 AND 2 I

MOTION TO AMEND

SUPPLEMENT TO PETITION FOR LEAVE TO INTERVENE  
BY CITIZENS FOR FAIR UTILITY REGULATION (CFUR)



NOW COMES Citizens for Fair Utility Regulation (CFUR) and files its Motion to Amend Supplement to Petition for Leave to Intervene and in support of the Motion would respectfully show the following:

1) The 05/17/79 NRC Staff Memorandum Regarding Contentions proposed substitution of "What the Staff believes is an acceptable contention encompassing all of the concerns expressed" is not an adequate or accurate representation of the eight CFUR contentions contained in Section IV of CFUR's Supplement, or of any other CFUR contention.

2) CFUR would respectfully use the form of the staff proposal but change the substance so as to accurately reflect the concerns of CFUR and its members.

3) CFUR therefore proposes the following consolidation of the eight CFUR contentions contained in Contentions IV A-H for purposes of clarity and convenience. In so doing, we reserve the right to present CFUR Contentions IV A-H in their entirety if CFUR is admitted as a party:

"The applicant's failure to adhere to the quality assurance/quality control provisions required by the construction permits for Comanche Peak, Units 1 and 2, and the requirements of Appendix B of 10 CFR Part 50, raises substantial questions as to the ability of the applicant to conduct an effective QA/QC program during the operation of CPSES. As a result special operating conditions are necessary before an operating license is issued for CPSES."

"In addition, the practice of the NRC has been to require calculation of the consequences of accidents that have small consequences while ignoring accidents that have large consequences. No matter how well-intended a QA/QC Program might be, CPUR contends that this practice would compromise the effectiveness of the program. This NRC practice has belittled the seriousness of accidents with large consequences in the minds of nuclear power plant employees and supervisors as well as the general public. In a properly conducted QA/QC program, the employees are constantly reminded of the possible consequences of any mistake on their part."

"Furthermore, on numerous occasions the resolution of an item of non-compliance and/or deviation, insofar as NRC staff action was involved, was nothing more than a change of paperwork to ostensibly ensure that

the problem was not repeated in the future. In addition, allegations concerning the adequacy of construction abound in this community and when presented in context with the documented problems identified by the NRC staff, become much more credible, even in the absence of the identity of the worker involved. CFUR contends that the adequacy of construction practices in these areas of non-compliance, (Lack of Organization, Welding, Steel, Groundwater Withdrawal, Concrete, Expansion Joint and Fracture Toughness Testing), should be included as an issue to ensure that the facility has been constructed in a manner necessary to meet the requirements of Appendix B of 10 CFR Part 50 and for safe operation. CFUR further contends that the NRC should undertake non-destructive testing immediately to ascertain the validity of the allegations enumerated."

Wherefore, premises considered, CFUR requests acceptance of the foregoing Motion to Amend Supplement to Petition for Leave to Intervene, in lieu of the staff proposal, and as a basis for admission of CFUR as an intervenor.

Respectfully submitted,

Richard L. Fouke

Richard L. Fouke  
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Nancy Holdam Jacobson

Nancy Holdam Jacobson  
CFUR

CERTIFICATE OF SERVICE

I hereby certify that copies of the Motion to Amend Supplement to Petition for Leave to Intervene by Citizens for Fair Utility Regulation in the above captioned proceeding will be hand-delivered or mailed by May 22, 1979 to the following parties:

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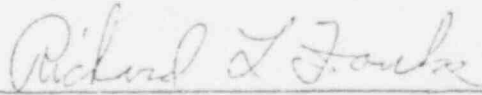
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Respectfully submitted,

  
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CFUR