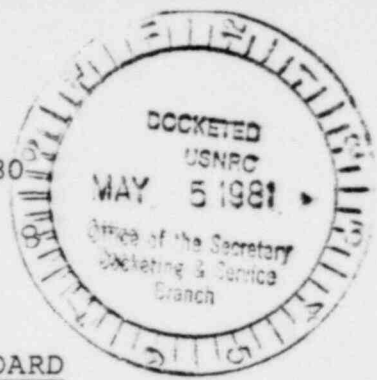


RELATED CORRESPONDENCE

May 4, 1980



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

TEXAS UTILITIES GENERATING)
COMPANY, et al.)

(Comanche Peak Steam Electric)
Station, Units 1 and 2))

Docket Nos. 50-445
50-446

(Application for
Operating License)

APPLICANTS' ANSWERS TO CFUR'S
THIRD SET OF INTERROGATORIES

Pursuant to 10 C.F.R. §2.740(b), Texas Utilities Generating Company, et al. ("Applicants") hereby submit answers to "CFUR's Third Set of Interrogatories to Applicant [sic] and Requests to Produce," served April 15, 1981. 1/ CFUR does not request production of any documents, contrary to the indication given in the heading of its pleading. Thus, Applicants need not provide any further response with regard to requests for production of documents in that document.

I. General Comments

As with CFUR's first and second sets of interrogatories, CFUR does not identify in this third set the contention at

1/ The date on the first page of CFUR's interrogatories is March 14, 1981. However, the attached certificate of service indicates the interrogatories were served April 15, 1981. Applicants have responded based on the date service was made.

8107020365

G

DS03
501

which each of the interrogatories is directed. It appears to the Applicants that the interrogatories are directed solely at Contention 3. Accordingly, Applicants' responses are predicated on the assumption that the interrogatories are concerned with Contention 3, which reads, as follows:

Contention 3: The computer codes used in [the] CPSES/FSAR must be tested and, if necessary, modified to accept the parameters reflecting the sequence of events at Three Mile Island and then to realistically predict plant behavior.

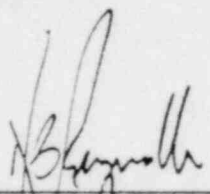
II. Answers to CFUR's Interrogatories

Each answer is identified by the number of the corresponding interrogatory as set forth in CFUR's Third Set of Interrogatories.

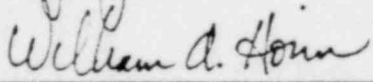
1. Applicants object to this interrogatory as seeking information which is irrelevant to Contention 3. That contention is concerned solely with the ability of the Applicants' computer codes to model the sequence of events at TMI and to predict resulting plant behavior. The interrogatory seeks information concerning a research program which consists of generic tests of reactor response to hypothetical large break loss-of-coolant accidents ("LOCA's"), while the "parameters reflecting the sequence of events at Three Mile Island" are unrelated to a large break LOCA event sequence. Accordingly, the ability of the Applicants' computer codes to predict the "actual results" of that research program is irrelevant to the issue raised in Contention 3.

2. Not applicable.
3. Not applicable.
4. Applicants object to this interrogatory on the same grounds as set forth in the response to Interrogatory 1.
5. Not applicable.
6. Not applicable.
7. Applicants' computer codes conservatively predict the results of the Semiscale and LOFT small break test series. An evaluation of this matter is being conducted by the Applicants in concert with the Westinghouse Owners Group (WOG) pursuant to NRC Action Plan Items I.C.1, II.K.3.5, II.K.3.30. The WOG reports on this matter were transmitted to the NRC on the following dates; October 26 and December 15, 1979, and March 3, 1981. As a result of an April 24, 1981 meeting between WOG and NRC, the WOG will transmit to the NRC in the near future a report documenting differences between the predicted results and the actual results of the appropriate LOFT and Semiscale small break tests.
8. See response to Interrogatory 7.
9. Not applicable.
10. See response to Interrogatory 7.
11. See response to Interrogatory 7.
12. Not applicable.

13. This information is not known to Applicants.
14. Not applicable.
15. Not applicable.
16. This information is not known to Applicants.
17. Not applicable.
18. Not applicable.
19. To the extent this interrogatory concerns "the inquired-about Test Series [and] Experiments" in Interrogatories 1 and 4, Applicants object on the grounds set forth in their responses to those interrogatories. To the extent this interrogatory concerns "the inquired-about Test Series [and] Experiments" in Interrogatories 7 and 10, Applicants respond as follows: None of which the Applicants are aware. To the extent the interrogatory concerns the "NRC Staff's computer codes," see responses to Interrogatories 13 and 16.
20. Not applicable.



Nicholas S. Reynolds



William A. Horin

DEBEVOISE & LIBERMAN
1200 Seventeenth Street, N.W.
Washington, D.C. 20036
202-857-9817

May 4, 1981

Counsel for Applicants

STATE OF TEXAS }
COUNTY OF DALLAS }

Homer C. Schmidt, being duly sworn, deposes and says:

That he is Manager, Nuclear Services, Texas Utilities-
Services, Inc., and knows the contents of the foregoing
Applicants' Answers to CFUR's third set of Interrogatories;
that the same is true of his own knowledge except as to matters
therein stated on information and belief, and as to that, he
believes them to be true.

Homer C. Schmidt

SWORN to and subscribed
before me on this 4th
day of May, 1981

Pat Wilson
Notary Public

My Commission Expires:

May 1, 1981

This affidavit is a telecopy of the original. The original
will be transmitted under separate cover to the Office of
the Secretary.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
TEXAS UTILITIES GENERATING)	Docket Nos. 50-445
COMPANY, <u>et al.</u>)	50-446
)	
(Comanche Peak Steam Electric)	(Application for
Station, Units 1 and 2))	Operating License)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Answers to CFUR's Third Set of Interrogatories" in the above captioned matter were served upon the following persons by deposit in the United States mail, first class postage prepaid this 4th day of May, 1981:

Valentine B. Deale, Esq.
Chairman, Atomic Safety and
Licensing Board
1001 Connecticut Avenue, N.W.
Washington, D.C. 20036

Chairman, Atomic Safety and
Licensing Appeal Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Forrest J. Remick, Member
Atomic Safety and Licensing
Board
305 E. Hamilton Avenue
State College, Pennsylvania 16801

Marjorie Ulman Rothschild, Esq.
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

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

L. J. Preister, Esq.
Assistant Attorney General
Environmental Protection
Division
P.O. Box 12548
Capitol Station
Austin, Texas 78711

Chairman, Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Richard L. Fouke
CFUR
1668B Carter Drive
Arlington, Texas 76010

Arch C. McColl, III, Esq.
701 Commerce Street
Suite 302
Dallas, Texas 75202

Jeffery L. Hart, Esq.
4021 Prescott Avenue
Dallas, Texas 75219

Mrs. Juanita Ellis
President, CASE
1426 South Polk Street
Dallas, Texas 75224

Mr. Geoffrey M. Gay
West Texas Legal Services
100 Main Street (Lawyers Bldg.)
Fort Worth, Texas 76102

Mr. Chase R. Stephens
Docketing & Service Branch
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

William A. Horin

William A. Horin

cc: Homer C. Schmidt
Spencer C. Relyea, Esq.