

# CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

EXPRESS MAIL

June 9, 1983

1426 S. Polk  
Dallas, Texas

75224

214/946-9446

'83 JUN 13 A10:49

Nicholas S. Reynolds, Esq.  
Debevoise & Liberman  
1200 - 17th St., N. W.  
Washington, D. C. 20036

Marjorie Ulman Rothschild, Esq.  
Office of Executive Legal Director  
U. S. Nuclear Regulatory Commission  
Maryland National Bank Building  
7735 Old Georgetown Road - Room 10105  
Bethesda, Maryland 20814

Dear Nick and Marge:

SUBJECT: In the Matter of  
Application of Texas Utilities  
Generating Company, et al. for  
An Operating License for  
Comanche Peak Steam Electric  
Station Units #1 and #2 (CPSES)  
Docket Nos. 50-445 and 50-446

## Cross-Examination Documents

We are attaching documents which we know we will be asking questions on during cross-examination in the hearings beginning June 13, 1983. Since we only received the prefiled testimony of Applicants' and Staff's witnesses day-before-yesterday, there may be a few others; also, we are supposed to pick up some documents from Applicants this afternoon and perhaps a few others later. We will advise you as soon as we know for certain regarding the remainder of the documents. We don't expect that there will be many.

We've indicated whether Applicants' or Staff's witnesses will be cross-examined. Also, for some, we have indicated basically what we will be asking questions about, to give the witnesses as much assistance as possible in advance of the hearings to review the documents to save everyone's time in the hearings themselves.

CASE Exhibit 844 - 3/11/83 Office Memorandum, TUSI, J. S. Marshall to H. C. Schmidt, re: NRC "erosion of confidence" in stating CPSES is a safe plant. (This was attached as Enclosure 3 to the March 30, 1983, letter from Thomas M. Novak, NRC, Washington, to ASLB for CPSES, along with other attachments.) -- STAFF AND APPLICANTS

CASE Exhibit 845 - 11/19/82 Regional Construction Assessment Team Inspections, Temporary Instruction 2512/07 Revision 1, from NRC Inspection and Enforcement Manual (Questions will concern primarily manner in which CPSES CAT inspectors handled their inspections, etc.) -- STAFF

CASE Exhibit 849 - I&E Report 50-445/82-25, 50-446/82-13, re: Vendor (Chicago Bridge & Iron Co.) failure to adequately control inprocess fabrication activities; and NRC's questions "whether current surveillance practices sufficiently address vendor in-process activities, and whether the TUGCO vendor performance measurement system gives a sufficient weighting to significant identified product deficiencies and deficiencies of a recurring nature. -- STAFF

8306150406 830609  
PDR ADDCK 05000445  
PDR

DS03

CASE Exhibit 850 - I&E Report 50-445/82-24, 50-446/82-12, re: Systematic Assessment of Licensee Performance (SALP) for period October 1, 1981, through September 30, 1982. - STAFF

NRC Staff Exhibit 13B - FR Vol. 47, No. 46, 3/9/82, 9987-9995, General Statement of Policy and Procedure for Enforcement Actions - STAFF

NRC Staff Exhibit 181 - I&E Report 50-445/80-25, 50-446/80-25, SALP for period August 1, 1979, through July 31, 1980 - STAFF

NRC Staff Exhibits 182-195 - NRC Trend Analyses for CPSES, 1976, 1977, 1978, and 1979 - STAFF

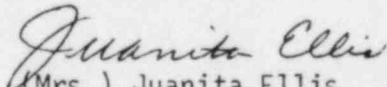
(The I&E Reports cross-examination will have to do with whether there is anything in the reports which the CAT team sees as being similar to their findings in the CAT report, whether this is of concern to the CAT team, whether they were aware of these items, whether this indicates that there may be a continuing problem with specific areas, etc.

This also applies to the NRC Trend Analyses.)

I'll be in touch with Messrs. Treby and Horin sometime today (hopefully) and will be advising them of the preceding at that time. This should reach you by tomorrow in time for you to have before the week-end (in any event, you'll be advised today in case you want to go ahead and get copies of the documents into the hands of your witnesses).

Sincerely,

CASE (Citizens Association for Sound Energy)

  
(Mrs.) Juanita Ellis, President

Attachments (to parties and ASLB only)

cc: Service List - Express Mail to parties and ASLB; First Class to balance