

10/23/81  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION'81 OCT 27 P2:56  
PDBEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

TEXAS UTILITIES GENERAL  
COMPANY, et al. )Docket Nos. 50-445  
50-446(Comanche Peak Steam Electric  
Station, Units 1 and 2 )(Application for  
Operating Licenses)CFUR'S ANSWERS TO APPLICANT'S FOURTH  
SET OF INTERROGATORIES AND REQUESTS TO PRODUCE

Pursuant to 10. C.F.R. Section 2.740(b), Citizens for Fair Utility Regulation; "CFUR" hereby submit their answers to "Applicant's" Fourth Set of Interrogatories and Request to Produce dated October 2, 1981.

ANSWERS

1 - 4 Yes, Yes. The methodology, information, data and analyses in the Final Environmental Statement, "FES", for Comanche Peak, for purposes of Contention 9, addresses only average conditions based upon random releases of radioactive gases yet Applicant has the capacity to control its releases so as to minimize the exposure of the general public to such radioactive material.

Therefore CFUR's specific objection to such information is that it is not sufficient to comply with 10 CFR Part. 20.1(c).

2 - 4 At the time CFUR responded to Applicant's Interrogatory 93-3 CFUR understood that Applicant's position was that there would be no planned releases from Comanche Peak. Applicant has since taken the position that there will be anywhere from twelve to eighty planned releases per year on an average in its letter of 9/25/81 from Homer C. Schmidt. Identification of sources of such leakages or creditable compromise are therefore moot at this time in that Contention 9 deals with the manner in which those releases should be made, not where they are coming from.

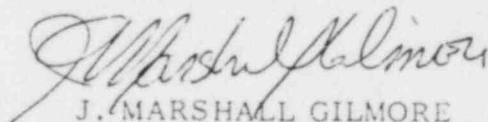
3 - 4 As stated in answer to 2 - 4 hereof Applicant admits that it will make planned releases of radioactive materials. Contention 9 as defined earlier by CFUR

DS03  
50/1

relates to how those releases are conducted. The Applicant is required to know what radioactive elements are capable of being released in gaseous form and the source of its release.

- 4 - 4 CFUR expects the Applicant to comply with all NRC regulations concerning containable transients and/or accidents.
- 5 - 4 Table 5.7 of the FES indicates average atmospheric disbursements factors and deposition values for maximum sight boundary and receptor locations near CPSES. CFUR contends that the Applicant is obligated to minimize cumulative person-rem exposure by choosing optimum meteorological conditions which affect the particular subject area. In choosing such optimum meteorological conditions the methodology should include the factor that the Applicant can purposefully time such planned releases.
- 6 - 4 CFUR Contention 9 is concerned with cumulative person-rem exposure rather than maximum individual dose commitments.
- 7 - 4 Applicants have control over timing of releases so as to take into consideration the direction of the wind and other meteorological factors. Therefore, for instance, use of mean directional wind calculations is improper methodology.
- 8 - 4 That geographical region which corresponds to and contains ninety-five percent (95%) of the total body person-rem and person thyroid-rem exposures from radioactive material releases at Comanche Peak.

Respectfully submitted,



J. MARSHALL GILMORE  
CFUR  
1060 W. Pipeline Road  
Hurst, TX 76053

DOCKETED  
USNRCUNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'81 OCT 27 P2:56

PD

BEFORE THE ATOMIC SAFETY AND LICENSING BOARDOFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

TEXAS UTILITIES GENERATING )  
COMPANY, et al. )Docket Nos. 50-445  
50-446(Comanche Peak Steam Electric )  
Station, Units 1 and 2 )(Application for  
Operating Licenses)CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing instrument in the above captioned matter were served upon the following persons by deposit in the United States mail, first class postage prepaid this 23 day of Oct 1981.

Marshall E. Miller, Esq.  
Chairman, Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

Dr. Kenneth A. McCollom  
Dean, Division of Engineering,  
Architecture & Technology  
Oklahoma State University  
Stillwater, Oklahoma 74074

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

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

J. Marshall Gilmore, Esq.  
1060 W. Pipeline  
Hurst, TX 76053

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

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

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

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

Richard E. Fouke  
1668-B Carter Dr.  
Arlington, TX 76010



J. MARSHALL GILMORE