

# CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

1426 S. Polk  
Dallas, Texas 75224

214/946-9446

May 20, 1982

Mr. Nick Reynolds  
Debevoise & Liberman  
1200 - 17th St., N. W.  
Washington, D. C. 20036

02 111-7245  
WEH

Dear Nick:

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)

CASE's Supplementary Answers to Applicants'  
8/1/80 First Set of Interrogatories to CASE  
and Requests to Produce, Question 2

We'll be supplementing our answers to Applicants' interrogatories along as we narrow down the specific issues and documents we will be addressing in the upcoming hearings. We're therefore supplementing our answer to Question 2 of Applicants' First Set to CASE.

We will be relying in the hearings on the following, about which we will be in touch with you soon regarding a stipulation as to their authenticity, as suggested in your response to the first question of our 5/7/82 Eleventh Set:

Brown & Root NCR (Nonconformance Report) C650 and its Revisions, regarding the crack in the base mat for Containment No. 1.

The QA/QC aspects of the overexcavation (or rock overbreak) insofar as it relates to Contention 5, especially regarding Applicants' apparent lack of analysis as to whether or not the overexcavation may have helped cause the crack in the base mat. We have not determined precisely which documents, slides, or pictures we will be relying on but will be in touch with you soon in this regard, as well as to discuss whether or not it will be necessary for us to file a motion to compel regarding Questions 101-105 of our Eleventh Set.

Respectfully submitted,

CASE (CITIZENS ASSOCIATION FOR SOUND ENERGY)

*Juanita Ellis*  
(Mrs.) Juanita Ellis  
President

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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)

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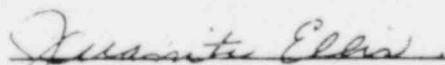
Docket Nos. 50-445  
and 50-446

*with*

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of CASE's 5/20/82 Motion to Strike Applicants' Motion for Summary Disposition of CASE's Contention 5 for Late Filing; CASE's Supplementary Answers to NRC Staff's 2/22/82 Fourth Set to CASE and to Applicants 8/1/80 First Set to CASE have been sent to the names listed below this 20th day of May 1982, by: Express mail where indicated by \* and by First Class Mail elsewhere.

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| * Administrative Judge Marshall E. Miller<br>U. S. Nuclear Regulatory Commission<br>Atomic Safety and Licensing Board Panel<br>Washington, D. C. 20555 | David J. Preister, Esq.<br>Assistant Attorney General<br>Environmental Protection Division<br>P. O. Box 12548, Capitol Station<br>Austin, TX 78711 |
| * Dr. Kenneth A. McCollom, Dean<br>Division of Engineering, Architecture,<br>and Technology<br>Oklahoma State University<br>Stillwater, Oklahoma 74074 |  |
| * Dr. Richard Cole, Member<br>Atomic Safety and Licensing Board<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555                      | Atomic Safety and Licensing<br>Board Panel<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555                                       |
| * Nicholas S. Reynolds, Esq.<br>Debevoise & Liberman<br>1200 - 17th St., N. W.<br>Washington, D. C. 20036  | Atomic Safety and Licensing<br>Appeal Panel<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555                                      |
| * Marjorie Ulman Rothschild, Esq.<br>Office of Executive Legal Director<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555              | Docketing and Service Section<br>Office of the Secretary<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555                         |

  
(Mrs.) Juanita Ellis, President  
CASE (CITIZENS ASSOCIATION FOR SOUND ENERGY)