

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
TEXAS UTILITIES)	Docket Nos. 50-445 OL
GENERATING COMPANY, ET AL.)	50-446 OL
(Comanche Peak Steam Electric)	
Station, Units 1 and 2))	

CASE MOTION TO IDENTIFY AN ADDITIONAL WITNESS

On Tuesday, June 29, 1982, a member of CASE was contacted by David G. Stinson, a former Quality Control Inspector at Comanche Peak. Mrs. Ellis of CASE was able to talk to Mr. Stinson at length on the morning of June 30, 1982. On the basis of the information that CASE has obtained, we move that CASE be permitted to identify and call Mr. Stinson as a witness despite the fact that the deadline for identifying witnesses was June 23, 1982.


We understand that Mr. Stinson was a Quality Control Inspector in the areas of hangers, the stainless steel liner, and Hilti bolts, among others. He would testify to the lack of documentation or poor documentation in quality assurance; inadequate QC staffing; lack of qualifications of QA personnel; old, obsolete, and inadequate procedures; cost pressures; improper use of construction and quality assurance travelers, particularly with respect to welding; and poor morale. His testimony is central to the contention before the Board.

By approximately 11:00 a.m. on Wednesday, June 30, 1982, CASE informed Counsel for the Applicant of our desire to call Mr. Stinson, outlined his areas of testimony, and provided his address. We also arranged to have him available for deposition on Friday, July 2. As this is written, he has agreed to be available at 11:00 a.m. The Applicant would prefer 9:00 a.m., but we have not yet been able to confirm with Mr. Stinson that he can be available at that time.

We have also attempted to inform the NRC Staff Counsel, who has not yet been available.

In this circumstance, there is no prejudice to any party if Mr. Stinson were to be called. There is ample opportunity to take his deposition and prepare for his testimony to the same extent as with the other witnesses previously identified by CASE. Accordingly, CASE asks that it be allowed to identify and call Mr. Stinson as a witness.

Respectfully submitted,


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Counsel for CASE

DATED: June 30, 1982

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NUCLEAR REGULATORY COMMISSION

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In the Matter of)	
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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 Licenses)

CERTIFICATE OF SERVICE

I hereby certify that copies of CASE Motion to Identify an Additional Witness in the above-captioned proceeding have been served on the following by deposit in the U.S. mail, first class, by messenger, and express mail on this 30th day of June.

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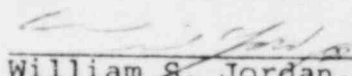
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June 30, 1982


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