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April 27, 1983

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

Re: Texas Utilities Generating Company, et al.  
(Comanche Peak Steam Electric Station,  
Units 1 and 2), Docket Nos. 50-445 and 50-446

Dear Juanita:

This is to summarize Applicants' responses to CASE's requests for documents set forth in your letter of March 11, 1983. As you are aware, on March 9, 1983, the Board authorized "limited," "informal discovery" regarding the documents cited in, and "other necessary data" concerning, the report of the NRC special investigation team regarding the pipe support design allegations. (I&E Report 82-26/82-14). See March 9, 1983 Memorandum and Order at 1-2. In accordance with the Board's direction, Applicant~~s~~ responded to your requests (as further specified in several telephone conversations with Applicants and Applicants' counsel), by producing numerous documents for CASE prior to April 4, 1983, when evidentiary hearings in the proceeding were scheduled to resume.

Following postponement of the hearings, CASE further clarified or supplemented certain of its requests. In addition, the NRC Staff identified (by letters of March 30, and April 6, 1983) several of Applicants' documents it considered relevant to particular requests and which had been used by the NRC in the preparation of its Report but which were not expressly identified therein. Applicants provided those additional documents identified by the NRC Staff. Further, during the April 7, 1983, conference call between the Board and parties, the Board directed that all remaining discovery requests be specified to enable the parties to conclude discovery. At that time, you identified certain additional requests for documents to which Applicants have now responded. Finally, during the April 25, 1983, conference call you made additional requests concerning NPSI pipe support design criteria. These inquiries are discussed below.

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During this informal discovery period, Applicants have cooperated in producing documents even when the requests have gone beyond what we believe to be the scope of the "limited" discovery authorized by the Board. All told, Applicants have provided over 2000 pages of documents to CASE during this "limited" discovery period. We now consider discovery to have concluded.

We set forth below a summary of our responses to each of your requests. The item numbers are as specified in your March 11, 1983, letter.

<u>Item Number</u>	<u>Response</u>
<u>Item 3:</u>	Applicants have referred CASE to NPSI and ITT-Grinnel for resolution of this request. See discussion below following response to Item 199.
<u>Items 4, 5, 13, 20, 25, 27 and 29:</u>	Applicants provided the requested documents.
<u>Item 38:</u>	Applicants informed CASE that there are no documents within the scope of this request.
<u>Item 42:</u>	Applicants provided the requested documents.
<u>Item 47:</u>	Applicants provided the documents requested in parts (2) and (3) of Item 47. Applicants informed CASE that the hanger identified in Item 47(1) had been redesigned and documents concerning its design no longer existed.
<u>Items 54 and 55:</u>	Applicants provided the requested documents.
<u>Item 56:</u>	Applicants provided the documents identified by the NRC Staff in their letter to CASE of March 30, 1983, as being responsive to Item

56. Applicants informed CASE that these documents were also responsive to Item 47.

Item 58:

Applicants informed CASE that the material provided in response to Items 54 and 55 also was responsive to this item.

Item 65:

See Item 66.

Item 66:

Applicants provided the documents identified by the NRC Staff in its March 30, 1983, letter as satisfying this request. Applicants also provided an additional drawing in response to this request. Applicants informed CASE that this material is also responsive to Item 65.

Items 67 and 68:

Applicants provided the requested documents. Applicants informed CASE that the material produced in response to Item 68 is also responsive to Item 115.

Items 82 and 83:

Applicants provided the requested documents.

Item 84:

Applicants have been informed by the NRC Staff that they have identified certain of Applicants' documents which they consider to be responsive to this request. They will forward these documents to Applicants in the near future for review prior to their release to CASE. Applicants will notify CASE when they have had an opportunity to review the documents.

Item 88:

Applicants provided the material identified by the NRC Staff in its letter to CASE of April 6, 1983 as responsive to this request.

Item 89:

Applicants provided the material identified in the NRC Staff letter to CASE of March 30, 1983 as responsive to this request. Applicants informed CASE that this material is also responsive to Item 67.

Items 96, 103, 107, 110, 111, and 113 :

Applicants provided the requested documents. Applicants informed CASE that the material provided in response to Item 113 was also responsive to Item 148.

Item 115:

See Item 68.

Items 117, 118, 119 and 120:

Applicants provided the material identified by the NRC Staff in its letter of April 6, 1983 as responsive to these requests.

Item 121:

Applicants provided an example of this evaluation in the documents provided in response to Item 169. Applicants informed CASE that the memorandum provided in response to Item 119 is also responsive to this request.

Item 126:

Applicants provided the requested documents.

Item 128:

Applicants provided the stress problem identified by the NRC Staff in its letter of March 30, 1983. Applicants informed CASE that this problem was also responsive to Item 110.

Item 131:

Applicants informed CASE that the material provided in response to Items 68 and 115 was responsive to this request.



Item 132:

Applicants provided the documents identified by the NRC Staff in their letters of March 30 and April 6, 1983. Applicants informed CASE that the material provided in response to this item is also responsive to Item 143.

Item 133:

Items 103 and 133 request the same study. Applicants have provided this study.

Item 134:

Applicants provided the requested documents.

Item 139:

Applicants informed CASE that the referenced hanger no longer exists and no documentation on the hanger was retained.

Item 140:

Applicants informed CASE that no documents responsive to this request are in existence in that the subject matter was dealt with in discussions with the NRC Staff.

Items 141 and 142:

Applicants provided the requested documents.

Item 143:

Applicants provided the documents referenced by the NRC Staff in its letter of April 6, 1983.

Item 144:

The information requested here is contained in the documents provided in response to Item 199.

Item 145:

Applicants provided the requested documents.

Item 146:

The report provided in response to Items 103 and 133 is also responsive to this request. In addition, another analysis was provided which is responsive to this request.

Item 148: Applicants provided the stress problems identified by the NRC Staff in their letter of April 6, 1983. These problems are also responsive to Items 169 and 170.

Item 149: Applicants provided the requested documents.

Item 150: Applicants provided the document identified by the NRC Staff in its letter of April 6, 1983 as responsive to this request.

Item 157: Applicants provided the requested documents.

Item 166: Applicants provided the material identified by the NRC Staff in their letter of March 30, 1983, as responsive to this request.

Items 169 and 170: Applicants provided the requested documents. Also see response to Item 148.

Item 175: Applicants informed CASE that there is no documentation related to this request.

Item 181: Applicants provided the letter referenced by the NRC Staff in its letter of April 6, 1983.

Items 184, 189 191-194 and 196: Applicants provided the requested documents.

Item 198: Applicants provided the material identified by the NRC Staff in its letter of March 30, 1983, as responsive to this request.

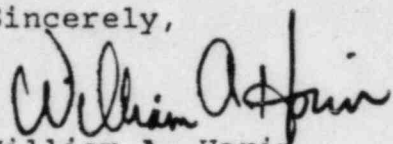
Item 199: Applicants provided the requested documents.

With respect to your request (Item 3) concerning the NPSI and ITT-Grinnel pipe support design criteria, following conversations between yourself and NPSI, Applicants were authorized by NPSI to provide to CASE certain pages from the NPSI design criteria for pipe supports which NPSI had identified as responsive to your requests. Applicants have now provided those pages. Further, regarding the two additional requests concerning these criteria which you made during the April 25, 1983, conference call with the Board, we agreed in our subsequent telephone conversation that one was clearly beyond the scope of your previous requests. Therefore, we agreed that pursuit of that request was precluded in view of the cut-off of discovery established by the Board. Regarding the second request, you agreed to provide further clarification before a determination could be made. You should provide this clarification to NPSI directly. In addition, Applicants have forwarded to NPSI your request for a letter summarizing NPSI's response to your requests.

With respect to your requests concerning the ITT-Grinnel pipe support design criteria, we understand that ITT-Grinnel has contacted you directly concerning the execution of a protective agreement with respect to the pages from their design criteria which are responsive to your requests. You are to pursue this matter with the company directly.

Finally, Applicants have also provided a new copy of Appendix F to the ASME Code in response to your request therefor made during the April 7, 1983, conference call.

Sincerely,

  
William A. Horin  
Counsel for Applicants

cc: Service List