

CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

October 13, 1983

1426 S. Polk
Dallas, Texas 75224

DOCKETED
USNRC

214/946-9446

'83 OCT 17 P4:06

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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)

Request for Stipulations or Admissions
Regarding Documents Attached as An
Offer of Proof to CASE's (1) Motion
to Add a New Contention (Contention
26), (2) Motion for Discovery, and
(3) Offer of Proof

As discussed on pages 15 and 16 of subject pleading, under today's date, we request that Applicants stipulate or admit to the authenticity of the documents discussed.

We also ask that you bring these documents with you to the hearings beginning October 17, 1983, since we will be asking cross-examination questions regarding some of them.

We'll appreciate your cooperation in this matter.

Sincerely,

CASE (Citizens Association for Sound Energy)

Juanita Ellis
(Mrs.) Juanita Ellis
President

cc: Service List

Footnote to Stuart Treby, NRC, Washington: As indicated in the above, please bring the documents attached to the above-referenced Motion with you to the hearings next week; we will be doing some cross-examining on them. Thanks.

je

D503

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

10/13/83

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
(CPS&S)

Docket Nos. 50-445
and 50-446

INDEX

TO

CASE'S (1) MOTION TO ADD A NEW CONTENTION,
(2) MOTION FOR DISCOVERY, AND
(3) OFFER OF PROOF

PROPOSED CONTENTION 26	Page 1
REGULATIONS GOVERNING NEW CONTENTIONS	3
GOOD CAUSE EXISTS FOR CASE'S NOT HAVING FILED THIS CONTENTION PRIOR TO THIS TIME	5
Did not have access; new information; just received; discovered in connection with DP&L rate hearings	5
Applicants attempted to prevent CASE from obtaining the information, then attempted to prevent CASE from obtaining the information except under a protective order	6
Testimony in these proceedings by both Applicants and the NRC Staff regarding the magnitude and extent of problems in construction and/or design at Comanche Peak has been misleading	9
CASE is attempting to review, analyze, and prepare the documents received in a controlled, organized fashion, as directed by the Licensing Board	14

	<u>Page</u>
DISCUSSION OF SPECIFIC PROBLEM AREAS AND DOCUMENTATION -- OFFER OF PROOF	15
Listing of all systems at Comanche Peak which <u>have</u> and <u>have not</u> been turned over to operations	17
In direct contradiction with testimony in these proceedings	19
Questions raised	20
Use of proper guidelines at Comanche Peak	22
General Information Regarding Tests	23
Punchlists	24
Tests Performed	26
Thermal Expansion Test (CASE Exhibit 860)	26
Containment Temperature Survey (CASE Exhibit 857)	35
Control Room Heating & Ventilation System Performance (CASE Exhibit 859)	37
Steam Generator Safety and Relief Valves (CASE Exhibit 862)	38
Containment Integrated Leak Rate Test (CASE Exhibit 863)	39
Reactor Coolant Pump Test (CASE Exhibit 861)	40
Auxiliary Feedwater Turbine Driven Pump (CASE Exhibit 856)	41
Hot Functional Test Sequence (CASE Exhibit 858)	43
Major Problem Areas	46
NEED FOR DISCOVERY	50
INFORMATION OBTAINED IS RELEVANT, MATERIAL, AND VITALLY IMPORTANT FOR THE RECORD	51
CASE'S MOTION WILL NOT DELAY THE PROCEEDINGS	54
CASE'S MOTIONS	54