

CASE

1426 S. Polk
Dallas, Texas 75224

(CITIZENS ASSN. FOR SOUND ENERGY)

May 10, 1984

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EXPRESS MAIL

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. William A. Horin, Esq.
Bishop, Liberman, Cook, Purcell & Reynolds
1200 - 17th St., N. W.
Washington, D. C. 20036

Dear Bill:

Subject: In the Matter of
Texas Utilities Electric Company, et al.
(Comanche Peak Steam Electric Station,
Units 1 and 2)
Docket Nos. 50-445-1 and 50-446-1
Discovery Requests -- A500 Steel

As we discussed today, I am attaching our discovery requests regarding Applicants' 4/11/84 Response to Partial Initial Decision Regarding A500 Steel.

As was also discussed with you (and Nick) and the NRC Staff counsel (and reaching agreement with all), we are moving to the top of our list of things to do our counterproposal regarding a possible settlement on the design matters, in response to Applicants' proposal of May 1, 1984. This will enable us to immediately begin work on our counterproposal, in time for the 1:00 P.M. (our time) telephone conference with you (and the Staff also, if you have no objections) tomorrow afternoon regarding our counterproposal. And, as agreed, this will necessitate our postponing some of the items which we have on our calendar for today and tomorrow:

CASE's Answer to Applicants' Motion for Summary Disposition on AWS/ASME welding matters

CASE's Answer to Applicants' Response on A500 Steel (we understand that the Staff has requested an extension until next Thursday, 5/17/84; since we won't have the discovery requests on Monday and would have to file a request probably for more time, it might make more sense for us to file a partial reply at the same time the Staff does -- let's talk about this)

CASE's 5-week Answers to Board's 3/15/84 Order (don't have the transcript of the 4/18/84 conference call, but believe the Board said we could wait on answers until they ruled; know they did on the 4-week item; if not, will file something on this Monday, 5/14/84)

We'll talk with you tomorrow.

Sincerely,

CASE (Citizens Association for Sound Energy)

8405160434 840510
PDR ADOCK 05000445
G PDR

Juanita

(Mrs.) Juanita Ellis, President

cc: Service List -- to be mailed with other items on 5/14/84

DS03

DOCUMENTS REQUESTED BY CASE REGARDING A500 STEEL:

1. Re: Page 5, footnote 6: Documentation showing the contract dates for all piping on which the tube steel supports are placed.
2. Re: Page 5, footnote 6: The signed contract dates with documentation for ITT Grinnell, NPSI, and PSE; i.e., dates when they had the pipe supports within their scope of work. (Answer for each.)
3. Re: Page 5, footnote 6: Dates of approved Revision 0 to the design criteria for NPSI, ITT Grinnell, and PSE for Comanche Peak. (Answer for each.)
4. Re: Page 5, footnote 6: Documentation showing mutual consent of owner, manufacturer and installer.
5. Re: Page 14, first full paragraph: Dated documentation showing how the Applicants considered the significance of the revised yield values.
6. Re: Page 16, first full paragraph: That portion of the design criteria from PSE, NPSI, and ITT Grinnell that indicates level B allowables are to be used with level C loads. (Answer for each.)
7. Re: Page 17, first full paragraph: Dated documentation showing that the "Applicants were aware of such conservatisms at the time the A500 yield strengths were revised and thus, were satisfied that the adequacy of designs using the original yield values was assured."
8. List of the referenced 182 supports on page 19.
9. Re: Page 19: Calculations and drawings for the 182 supports reviewed, at the time of the review, referenced on this page.
10. Re: Page 19: Percentage of supports from ITT Grinnell, NPSI, and PSE that utilized tube steel in their original design. (Answer for each.)
11. Re: Page 2 of 2 of attachment to affidavit of John C. Finneran: documents showing the Applicants are a holder of a Certificate of Authorization.
12. Re: Page 1 of 2 of Attachment: Letter Applicants sent to ASME for the interpretation.
13. All documents (construed in the broad sense to include all handwritten notes, etc.*) which the Applicants made while discussing the interpretation with ASME.
14. Supply the names of the individuals who were on the ASME Committee who made the code interpretation.

* If in doubt, see definition contained within CASE's requests for documents and interrogatories.