

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

3/14/84
USNRC

'84 MAR 19 A10:18

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)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket Nos. 50-445
and 50-446

CASE'S EIGHTEENTH SET OF INTERROGATORIES
AND REQUESTS TO PRODUCE TO APPLICANTS

Pursuant to 10 CFR 2.740b and 2.741, CASE (Citizens Association for Sound Energy), Intervenor herein, hereby files this, its Eighteenth Set of Interrogatories and Requests to Produce to Applicants.

Please answer the following interrogatories and requests for documents in the manner set forth herewith:

1. Each interrogatory should be answered fully in writing, under oath or affirmation.
2. Each interrogatory or document response should include all pertinent information known to Applicants, their officers, directors, or employees, their agents, advisors, or counsel. Employees is to be construed in the broad sense of the word, including specifically Brown and Root, Gibbs & Hill, Ebasco, any consultants, sub-contractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors.
3. Each document provided should include a sworn statement of its authenticity.

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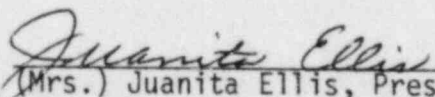
4. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.
5. Identify the person providing each answer, response, or document.
6. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the past directives of the Licensing Board. Because of the time restrictions under which we are presently working, we request that supplementation be made on an expedited basis.
7. For each item supplied in response to a request for documents, identify it by the specific question number to which it is in response. If the item is excerpted from a document, identify it also by the name of the document. Please also provide the copies in the correct order (rather than in reverse order).
8. The term "documents" shall be construed in the broad sense of the word and shall include any writings, drawings, graphs, charts, photographs, reports, studies, slides, internal memoranda, handwritten notes, tape recording, calculations, and any other data compilations from which information can be obtained.

CASE'S INTERROGATORIES AND REQUESTS TO PRODUCE TO APPLICANTS

The following interrogatories and requests to produce concern the issue of intimidation, harassment, and threatening of QC inspectors and other employees at Comanche Peak. The Licensing Board has stated that hearings will be held on this issue (see 12/28/83 Board Memorandum and Order (Scheduling Matters)).

1. Do Applicants have any kind of system set up to receive complaints or to discuss concerns from QC inspectors or other employees at Comanche Peak?
2. If the answer to 1. is yes, please give specific details regarding the type of system(s), who is involved in the system(s) (including names and titles), how the system works, how employees are informed of the system, etc. It is CASE's understanding that recently Applicants have hired an ombudsman. Include in your answer details regarding each system which currently exists or has existed in the past at Comanche Peak.
3. Supply for inspection and copying all documents (as defined in item 8 on page 2 of this pleading) of all management/employee disputes, complaints, or discussions regarding work of QC inspectors or workers, including letters of resignation by employees, letters to supervisors or management by employees, complaints to management or supervisors, etc.

Respectfully submitted,


(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound Energy)
1426 S. Polk
Dallas, Texas 75224
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

TEXAS UTILITIES GENERATING
COMPANY, et al.

(Comanche Peak Steam Electric Station
Station, Units 1 and 2)

Docket Nos. 50-445 and
50-446

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of
CASE'S EIGHTEENTH SET OF INTERROGATORIES AND REQUESTS TO PRODUCE TO APPLICANTS

have been sent to the names listed below this 14th day of March, 1984,
by: Express Mail where indicated by * and First Class Mail elsewhere.

* Administrative Judge Peter B. Bloch
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Atomic Safety and Licensing Appeal
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Docketing and Service Section
(3 copies)
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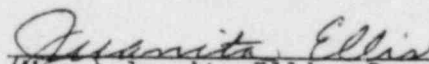
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