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April 7, 1984

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

EXPRESS MAIL

Mr. William A. Horin, Esq.
Bishop, Liberman, Cook, Purcell & Reynolds
1200 - 17th St., N. W.
Washington, D. C. 20036DOCKETING & SERVICE
BRANCH50-445-0L-2
50-446-0L-2

Dear Bill:

Subject: In the matter of
Texas Utilities Electric Company, et al.
(Comanche Peak Steam Electric Station,
Units 1 and 2)
Docket Nos. 50-445-2 and 50-446-2Clarification of Wording of Portions of
CASE's 3/14/84 Eighteenth Set of
Interrogatories and Requests to Produce
to Applicants

This is to confirm our recent telephone conversations regarding subject pleading.

At your request on 3/5/84, I clarified by phone yesterday (3/6/84) the wording of Question 3 of subject pleading. The clarified wording is attached. (Please note that there are two slight changes in the wording I gave you over the phone yesterday: On item (c), "Counseling" should be changed to "Counseling reports;" and on item (d), "(b)(2)" should be changed to "(b)(3)." We hope that this clarifies exactly what we want.

Sincerely,

CASE (Citizens Association for Sound
Energy)*Juanita Ellis*
(Mrs.) Juanita Ellis
President

Attachment

cc: Service List -- Docket Nos. 50-445-2 and 50-446-2

Clarification of Wording of Question 3 of CASE's 3/14/84 Eighteenth Set of Interrogatories and Requests to Produce to Applicants:

The wording of Question 3 is clarified as follows:

3. Supply for inspection and copying any and all documents between management (including supervisors, foremen, middle management, upper management, etc.) and employees regarding the following:
 - (a) Any and all management/employee disputes, complaints, differences, and/or discussions pertaining to:
 - (1) policy disputes, complaints, differences, and/or problems regarding enforcement, application, or interpretation of procedures, instructions, or regulations relating to the job or work of the employee or of employees under his/her supervision (including, but not limited to, overinspecting, "knitpicking," etc.);
 - (2) intimidation, harassment, threats, pressure to meet production, or other kinds of pressure;
 - (3) management directives (written or verbal) regarding the reporting of nonconforming conditions;
 - (4) and the like.
 - (b) Any and all letters of resignation by employees and responses by management in which such employees indicate concern or dissatisfaction with:
 - (1) the enforcement, application, or interpretation of procedures, instructions, or regulations relating to the job or work of the employee or of employees under his/her supervision (including, but not limited to, overinspecting, "knitpicking," etc.);
 - (2) intimidation, harassment, threats, pressure to meet production, or other kinds of pressure;
 - (3) management directives (written or verbal) regarding the reporting of nonconforming conditions;
 - (4) and the like.
 - (c) Counseling reports, termination reports, and exit interviews regarding (a) and (b) preceding.
 - (d) Any and all procedures, instructions, regulations, and/or management directives (including those supplied by employees) involved in (a)(1), (a)(3), (b)(1), and (b)(3) preceding.

Clarification of Wording of Question 3 of CASE's 3/14/84 Eighteenth Set of Interrogatories and Requests to Produce to Applicants (continued)

3. (continued):

- (e) Internal investigations conducted by management into such disputes, complaints, differences, problems, discussions, concerns or dissatisfaction, including those by the "ombudsman."
- (f) Any and all internal files Applicants or their employees have on employees contacted by the NRC.

For purposes of your answer, the following definitions shall apply:

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 recordings, calculations, and any other data compilations from which information can be obtained. (See item 8, page 2, of CASE's 3/14/84 Eighteenth Set.)

The term "employees" shall be construed in the broad sense of the word and shall include Quality Control Inspectors, craftspeople, engineers, and any other employees employed by 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. (See item 2, page 1, of CASE's 3/14/84 Eighteenth Set.)

The terms "procedures" and "instructions" shall be construed to include, but not be limited to: the written or verbal procedures or instructions under which the employees work; the written or verbal methods of reporting of nonconforming conditions by means of nonconformance reports (NCR's), inspection reports (IR's), component modification cards (CMC's), design change authorizations (DCA's), nondestructive examination reports (NDER's), field deficiency reports (FDR's), and/or any other method used for reporting nonconforming conditions.

The term "regulations" shall be construed to include, but not be limited to: the Code of Federal Regulations (CFR), especially 10 CFR; Applicants' Final Safety Analysis Report (FSAR); industry codes and practices; industry standards; etc.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	}{	
	}{	
TEXAS UTILITIES ELECTRIC	}{	Docket Nos. 50-445-2
COMPANY, <u>et al.</u>	}{	and 50-446-2
(Comanche Peak Steam Electric	}{	
Station, Units 1 and 2)	}{	

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of
CASE's 4/7/84 letter Applicants re: Clarification of Wording of Portions of
CASE's 3/14/84 Eighteenth Set of Interrogatories and Requests to Product
have been sent to the names listed below this 7th day of April, 1984,
by: Express Mail where indicated by * and First Class Mail elsewhere.

- | | |
|--|--|
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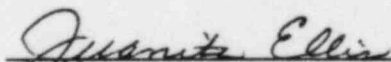
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