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## RELATED CORRESPONDENCE

April 9, 1984


 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 and
COMPANY, <u>et al.</u>	)	50-446-2
	)	
(Comanche Peak Steam Electric	)	(Application for
Station, Units 1 and 2)	)	Operating Licenses)

APPLICANTS' EIGHTH SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, Texas Utilities Generating Co., et al. ("Applicants") hereby request that the Citizens Association for Sound Energy ("CASE") respond to the interrogatories and requests for production of documents set forth below. These interrogatories and requests seek information that pertains to issues that remain open in this proceeding under the Order and Memorandum issued by the Board December 28, 1983; if appropriate, applicants may serve additional discovery requests with respect to these issues.

DEFINITIONS AND INSTRUCTIONSA. Definitions

As used in these interrogatories and requests for production of documents the following terms shall have the definitions stated:

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1. The term "document" is used in the broadest sense of that term and includes, but is not limited to, all writings of every kind, including letters and other correspondence, telegrams, memoranda, calendar and diary entries, summaries, any kind of records of meetings and conversations, sound or mechanical reproductions, long-hand, printed or typewritten forms, logs (whether of visits, telephone calls or otherwise), all drafts of any of the foregoing, and copies of documents that are not identical duplicates of the original (e.g., because of handwritten or "blind" notes appearing on them).

2. As applied to documents the term "identify" means:

a. state the date on which the document was prepared, the author(s) thereof, the signer(s) thereof, if any, the person(s) to whom addressed, if any, and any other identifying features.

B. Instructions

1. All interrogatories should be answered in writing, under oath, and the answer to each interrogatory shall include all responsive information known to CASE through any of its officers, directors, members, employees, advisors and counsel. The answer to each interrogatory shall also identify the person who prepared the response. Unless Applicants and CASE agree to shorten or extend the time for filing answers to the interrogatories, the answers shall be served on counsel for Applicants on or before the date prescribed by the applicable rules of procedure.

2. The requests for production require CASE to produce all responsive documents that are in the possession, or under the control, of CASE and its officers, directors, members, employees, advisors and counsel. Documents responsive to the requests for production shall be produced for inspection and copying at the offices of Bishop, Liberman, Cook, Purcell & Reynolds, 1200 Seventeenth Street, N.W., Washington, D.C. 20036. Compliance with this request may be made by mailing true and correct copies of the documents to Bruce L. Downey at the above address. Unless Applicants and CASE agree to shorten or extend the time for producing documents responsive to these requests, the documents shall be produced on or before the date prescribed by the applicable rules of procedure.

3. The interrogatories and requests are continuing in nature and require CASE to file supplemental answers and produce any additional responsive documents whenever CASE obtains information or documents that render any previous answer or production inaccurate or incomplete.

APPLICANTS' INTERROGATORIES AND REQUESTS TO PRODUCE

1-81/ Please state the full name and current address of each person that CASE will call as a witness on the issue of intimidation of QC inspectors. (This issue is identified

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1/ These interrogatories and requests are numbered 1-8, 2-8, etc., the first digit identifies the interrogatory or request, the second digit identifies the interrogatory or request as part of Applicant's eighth set of interrogatories and requests.

as issue "V" in the Board's Order dated march 15, 1984, and will be referred to as issue "V" in these interrogatories and requests.)

2-8 Separately, for each person identified in response to interrogatory no. 1-8, please:

- a) state the date on which the person began his/her employment at Comanche Peak;
- b) state whether the person is still employed at Comanche Peak, and, if not, the date on which the person stopped working at Comanche Peak;
- c) state the person's employer(s) during the time he/she was employed at Comanche Peak;
- d) state the the person's position(s) during the time he/she was employed at Comanche Peak;
- e) identify all documents that relate in any way to the person's testimony;
- f) provide a summary of testimony that CASE intends to elicit from the person, including a list of facts that CASE intends to establish through the person's testimony.

3-8 Identify and produce for inspection and copying all documents that CASE will offer as evidence with respect to issue "V."

4-8 State whether, in presenting its evidence on issue "V," CASE will rely on any document that has been introduced in evidence in any prior hearing in this proceeding.

5-8 If the answer to interrogatory no. 4-8 is yes:

- a) identify each such document by exhibit number;
- b) cite the pages of the transcript that record where the document was admitted in evidence; and
- c) list the facts that CASE intends to establish through the document.

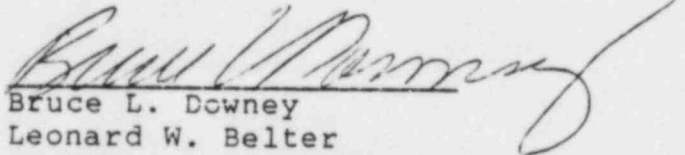
6-8 State whether, in presenting its evidence on issue "V," CASE will rely on any testimony elicited at any prior hearing in this proceeding.

6-9 If the answer to interrogatory no. 6-8 is yes:

- a) state the name and current address of the witness whose prior testimony will be offered as evidence on issue "V";
- b) cite to the pages of the transcript that record the testimony upon which CASE will rely; and

c) list the facts that CASE intends to establish  
through this testimony.

Respectfully submitted,



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Counsel for Applicants

April 9, 1984



CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Interrogatory's and Request's For Production of Documents were served upon the following persons by overnight deliver (\*), or deposited in the United States mail, first class, postage prepaid, this 9th day of April, 1984 or by hand delivery (\*\*) on the 10th day of April, 1984.

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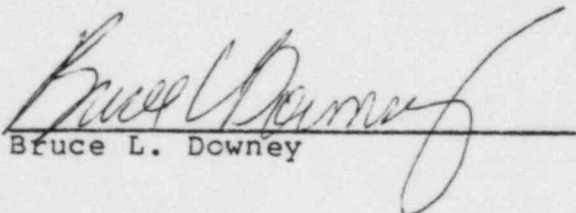
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