

DOCKETED
USNRC 6/7/84UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
84 JUN 11 P3:37
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
(CPSES)OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHDocket Nos. 50-415 *OL*
and 50-446 *OL*CASE'S TWENTY-FIRST 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 Twenty-First 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

All of these interrogatories and requests to produce have to do with TUGCO's response to Cygna's 3/30/84 Telecon questions regarding allowables and safety factors for Richmond inserts or questions triggered by this document. See CASE's 6/7/84 letter to Michael D. Spence, President of TUGCO, pages 5 through 7.

1. In regard to TUGCO's response to Cygna's 3/30/84 Telecon questions regarding allowables and safety factors for Richmond inserts (attached to the May 2, 1984, letter to Cygna from L. M. Popplewell, Project Engineering Manager for TUGCO, which was received by CASE attached to Cygna's 6/1/84 letter supplying information regarding Phase 3 of the Independent Assessment Program for Comanche Peak): What was the reason for this document's being marked

FOR LAWYER'S ATTENTION ONLY
NOT DISCOVERABLE

2. Where in NRC regulations is the justification for such information being "NOT DISCOVERABLE"?
3. Does the information contained in this document differ in any way from Applicants' previously stated positions in the operating license hearings?
4. If the answer to 3. preceding is yes, explain in detail such difference(s), the reasons for such differences, and why this was not called to the attention of the Licensing Board and parties in the operating license hearings.
5. Does the information contained in this document differ in any way from Applicants' statements or position as set forth in Applicants' 6/2/84 Motion for Summary Disposition Regarding Design of Richmond Inserts and Their Application to Support Design (received by CASE on 6/4/84)?
6. If the answer to 5. preceding is yes, explain in detail such difference(s), the reasons for such differences, and why this was not called to the attention of the Licensing Board and parties in the operating license hearings.
7. Are there any other documents which have been marked the same as, or similarly to:

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NOT DISCOVERABLE

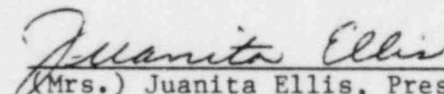
8. If the answer to 7. preceding is yes, list all such documents.
9. If the answer to 7. preceding is yes, supply copies of all such documents.
10. For each document listed in response to 8. preceding, provide the following information:
 - (a) Does the information contained in this document differ in any way from Applicants' previously stated positions in the operating license hearings?

10. (continued):

- (b) If the answer to (a) preceding is yes, explain in detail such difference(s), the reasons for such differences, and why this was not called to the attention of the Licensing Board and parties in the operating license hearings.
- (c) Does the information contained in this document differ in any way from Applicants' statements or position as set forth in any of Applicants' Motions for Summary Disposition filed since the last operating license hearings, or from Applicants statements or position as set forth in Applicants' 4/11/84 Response to Partial Initial Decision Regarding A500 Steel?
- (d) If the answer to (c) preceding is yes, identify which Motion(s) or Response it differs from, and explain in detail such difference(s), the reasons for such differences, and why this was not called to the attention of the Licensing Board and parties in the operating license hearings.

NOTE: Since this information is necessary before we can adequately respond to Applicants' Motions for Summary Disposition (especially regarding the Richmond Inserts), we ask that an expedited response be provided.

Respectfully submitted,


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

1426 S. Polk
Dallas, Texas 75224
214/946-9446

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 -1
COMPANY, <u>et al.</u>	}}	and 50-446-2 and -1
(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 TWENTY-FIRST SET OF INTERROGATORIES TO APPLICANTS AND REQUESTS TO
PRODUCE; and CASE's LETTER TO MICHAEL SPENCE, RE: BARRIERS TO SETTLEMENT

have been sent to the names listed below this 7th day of June, 1984,
by: Express Mail where indicated by * and First Class Mail elsewhere.

- | | |
|--|--|
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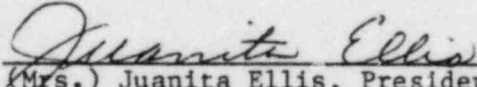
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