

# CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

1426 S. Polk  
Dallas, Texas

214/946-9446

50-445  
50-446  
75224  
DOCKETED  
USNRC

'84 JUN 25 PM2:07

June 21, 1984

Administrative Judge Peter B. Bloch, ASLB Chairman  
Dr. Kenneth A. McCollom, ASLB Member  
Dr. Walter H. Jordan, ASLB Member

Gentlemen:

SUBJECT: 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)  
Docket Nos. 50-445 and 50-446

CASE's Answers to Applicants'  
Motions for Summary Disposition

Pursuant to the Board's verbal Order during the 6/15/84 telephone conference call and subsequent instruction 6/20/84, we are supplying our best current estimate of the dates on which CASE will be able to file our Answers to Applicants' Motions for Summary Disposition.

These estimated dates are predicated and dependent upon when we receive responses from Applicants to questions and requests for documents which we have made (which includes a request to supply CASE with the same information Applicants supply to the Staff). It should be noted that we have not yet received any responses to the items requested during the 6/6/84 (over two weeks ago) or 6/11/84 Applicants/Staff/Case telephone conference calls.

Also, we received the transcript of the 6/8/84 Applicants/Staff Bethesda meeting on 6/14/84 (with attached documents) and are still reviewing it. (It appears in some instances to raise more questions than were answered, especially regarding certain portions which were inaccurately transcribed or marked "inaudible." We anticipate that further clarification from Applicants or Staff will be necessary for some portions.) Also, we have not yet received the transcript of the 6/11/84 Applicants/Staff/CASE telephone conference call, and our response is based on our rather sketchy notes of that call. And obviously we have not yet received a transcript of the Applicants/Staff Bethesda meeting which was scheduled for yesterday (possibly continuing into today).

We have tried to include a realistic estimate of the amount of time which will be necessary (for example, we have to review 182 drawings and calculations regarding item 1; we have to review 60 drawings, then perhaps ask for calculations on some of them, then review those calculations, as well as review test reports, regarding item 9; etc.). It may be, with Applicants' cooperation, that we can file before our target dates.

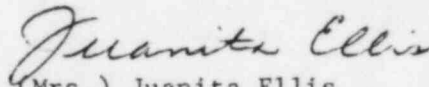
As discussed previously, both Messrs. Walsh and Doyle have been having to put in a lot of overtime on their jobs and anticipate that this will be continuing at least for the next several weeks. We will certainly do the best we can to respond as quickly as possible. However, it must be noted that it appears obvious that Applicants did not prepare these Motions overnight; they are obviously the product of many months of work by the staffs of both Applicants and their consultants and agents. We have attempted to make realistic estimates, considering the limitations of CASE's small organization and two engineers who are working overtime at other full-time jobs.

Messrs. Walsh and Doyle have indicated the Friday dates by which they can have the necessary information to me; the dates for responses (on the following Monday) therefore include time for typing, copying, collating, and preparing for mailing, which is more realistic. Again, these schedules are dependent on cooperation by Applicants in supplying the requested information; response dates will vary in direct proportion to any slippage by Applicants.

We will advise the Board as soon as we are aware of any changes in these estimates, as well as an estimate regarding items 11, 12, 13, and for those items which we have not yet received.

Respectfully submitted,

CASE (CITIZENS ASSOCIATION FOR SOUND  
ENERGY)

  
(Mrs.) Juanita Ellis  
President

Attachments

6/21/84

SCHEDULE FOR RESPONSES

(Item Nos. correspond to attached list of APPLICANTS' MOTIONS FOR SUMMARY DISPOSITION TO CASE.)

To be placed in mail Monday, 7/9/84 (or before), if received from Applicants by 6/22/84:

2. Damping Factors for OBE and SSE Loading Conditions
3. AWS and ASME Code Provisions (Design)
5. Section Property Values
7. Upper Lateral Restraint
10. U-Bolts Acting As Two-Way Restraints

To be placed in mail Monday, 7/16/84:

4. Friction Forces

To be placed in mail Monday, 7/23/84:

6. Gaps

To be placed in mail Monday, 7/30/84:

1. A500 Steel

To be placed in mail Monday, 8/6/84:

8. Safety Factors
9. Generic Stiffnesses

Unable to estimate at this time; will advise:

11. Richmond Inserts
12. Stability
13. Local Displacements and Stresses
- ? Design Quality Assurance Program
- ? Cinched-Up U-Bolts
- ? Axial Restraints

APPLICANTS' MOTIONS FOR SUMMARY DISPOSITION TO CASE

Already Answered by CASE:

4/5/84 Re: Certain CASE Allegations Regarding AWS and ASME Code Provisions Related to Welding Issues  
-- Answered 5/14/84

Received by CASE:

1. 4/11/84 Applicants' Response to Board's Partial Initial Decision Regarding A500 Steel (to be treated as Motion for Summary Disposition, per Board)  
-- Received 4/12/84
2. 5/16/84 Re: Alleged Errors Made in Determining Damping Factors for OBE and SSE Loading Conditions  
-- Received 5/17/84
3. 5/17/84 Re: Certain CASE Allegations Regarding AWS and ASME Code Provisions Related to Design Issues  
-- Received 5/17/84
4. 5/16/84 Re: Consideration of Friction Forces in the Design of Pipe Supports with Small Thermal Movements  
-- Received 5/17/84
5. 5/18/84 Re: CASE Allegation Regarding Section Property Values  
-- Received 5/19/84
6. 5/18/84 Re: Effects of Gaps on Structural Behavior Under Seismic Loading Conditions  
-- Received 5/19/84
7. 5/20/84 Re: Upper Lateral Restraint Beam  
-- Received 5/21/84
8. 5/20/84 Re: CASE's Allegations Regarding Safety Factors  
-- Received 5/21/84
9. 5/21/84 Re: Use of Generic Stiffnesses Instead of Actual Stiffnesses in Piping Analysis  
-- Received 5/22/84
10. 5/23/84 Re: CASE's Allegations Regarding U-Bolts Acting as Two-Way Restraints  
-- Received 5/24/84
11. 6/2/84 Re: Design of Richmond Inserts and Their Application to Support Design  
-- Received 6/4/84

APPLICANTS' MOTIONS FOR SUMMARY DISPOSITION TO CASE (continued):

12. 6/17/84 Re: Stability of Pipe Supports  
-- Received 6/18/84
13. 6/18/84 Re: Consideration of Local Displacements and Stresses  
-- Received 6/20/84

Still to Be Received (see Applicants' 6/13/84 letter to Board):

Design Quality Assurance Program

Effects of Cinched-Up U-Bolts

Force Distribution in Axial Restraints

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	}}	
	}}	
TEXAS UTILITIES ELECTRIC	}}	Docket Nos. 50-445-1
COMPANY, <u>et al.</u>	}}	and 50-446-1
(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 6/21/84 letter to ASLB, re: CASE's Answers to Applicants' Motions  

---

for Summary Disposition (with attached List of Motions and Estimated Filing Dates)

have been sent to the names listed below this 21st day of June, 1984,  
by: Express Mail where indicated by \* and First Class Mail elsewhere.

* Administrative Judge Peter B. Bloch U. S. Nuclear Regulatory Commission 4350 East/West Highway, 4th Floor Bethesda, Maryland 20814	* Nicholas S. Reynolds, Esq. Bishop, Liberman, Cook, Purcell & Reynolds 1200 - 17th St., N. W. Washington, D.C. 20036
* Ms. Ellen Ginsberg, Law Clerk U. S. Nuclear Regulatory Commission 4350 East/West Highway, 4th Floor Bethesda, Maryland 20814	* Geary S. Mizuno, Esq. Office of Executive Legal Director U. S. Nuclear Regulatory Commission Maryland National Bank Bldg. - Room 10105 7735 Old Georgetown Road Bethesda, Maryland 20814
* Dr. Kenneth A. McCollom, Dean Division of Engineering, Architecture and Technology Oklahoma State University Stillwater, Oklahoma 74074	Chairman, Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555
* Dr. Walter H. Jordan 881 W. Outer Drive Oak Ridge, Tennessee 37830	

Chairman  
Atomic Safety and Licensing Appeal  
Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

John Collins  
Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Dr., Suite 1000  
Arlington, Texas 76011

Michael D. Spence, President  
Texas Utilities Generating Company  
Skyway Tower  
400 North Olive St., L.B. 81  
Dallas, Texas 75201

Docketing and Service Section  
(3 copies)  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

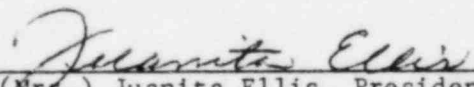
Renea Hicks, Esq.  
Assistant Attorney General  
Environmental Protection Division  
Supreme Court Building  
Austin, Texas 78711

Lanny A. Sinkin  
114 W. 7th, Suite 220  
Austin, Texas 78701

Dr. David H. Boltz  
2012 S. Polk  
Dallas, Texas 75224

Anthony Roisman, Esq.  
Trial Lawyers for Public Justice  
2000 P St., N.W., Suite 611  
Washington, D. C. 20036

Ms. Billie P. Garde  
Government Accountability Project  
1901 Que Street, N. W.  
Washington, D. C. 20009

  
\_\_\_\_\_  
(Mrs.) Juanita Ellis, President  
CASE (Citizens Association for Sound Energy)  
1426 S. Polk  
Dallas, Texas 75224  
214/946-9446