

635

# CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

1426 S. Polk  
Dallas, Texas 75224

214/946-9446

DOCKETED  
USNRC

October 18, 1984

'84 OCT 22 A11:09

Mr. William A. Horin, Esq.  
Bishop, Liberman, Cook, Purcell & Reynolds  
1200 - 17th St., N. W.  
Washington, D. C. 20036

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear Bill:

Subject: In the Matter of  
Texas Utilities Electric Company, et al.  
Application for an Operating License for  
Comanche Peak Steam Electric Station,  
Units 1 and 2  
Dockets Nos. 50-445 and 50-446 **02**

Documents Requested by CASE on Discovery  
Regarding Applicants' Motion for Summary  
Disposition Regarding Allegations  
Concerning Quality Assurance Program for  
Design of Piping and Pipe Supports for  
Comanche Peak Steam Electric Station

We are still reviewing the documents which CASE requested on discovery regarding subject Motion, and we will be getting back with you regarding some of the documents which you stated in your 10/4/84 letter (page 2) that you do not intend to provide.

There is one document, however, which you state you do not intend to provide to which we specifically call your attention. It is item 4 on the 8/15/84 list of documents we requested, "Gibbs & Hill Specification MS-46A (all revisions). (Page 16)."

In your letter you state that "The material not provided generally involves matters the content of which are not relied upon in our motion, such as technical specifications (3, 4). . . " Clearly this cannot be the reason for not supplying this specification (or, for that matter, item 3, "Gibbs & Hill Specification MS-200 (all revisions). (Page 16)." since they are both specifically referenced, not only in Applicants' Affidavit, but in Applicants' Statement of Material Facts, which states, in part:

- "2. Regulatory requirements and licensing commitments set forth in the license application are incorporated into design specification by Gibbs & Hill for Comanche Peak for both piping (Class 2 & 3) and supports. These specifications are transmitted to the responsible design organizations for incorporation in their design process..."

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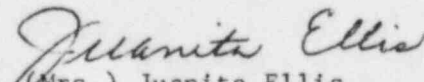
Actually, we have a few bits and pieces of MS-46A which we have received on discovery from time to time on various aspects of the Walsh/Doyle matters, and in discussing this with Ms. Boltz and reviewing our records, we find that we have a complete copy of Revision 5 of MS-46A which we obtained in the rate hearings. So it will not be necessary for you to provide a copy of Revision 5, only the other revisions before and after Revision 5.

We would also like to have, in writing, a restatement of Applicants' authorization to use in the operating license hearings documents we have received in the rate hearings, provided Applicants are advised what they are and are given an opportunity to assure themselves that there is no proprietary information contained in them.

You don't really want to fight with us before the Licensing Board on this one, do you? Please let me know in writing and we'll go from there.

Sincerely,

CASE (Citizens Association for Sound  
Energy)

  
(Mrs.) Juanita Ellis  
President

cc: Service List

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

84 OCT 22 A11:09

In the Matter of  
  
TEXAS UTILITIES ELECTRIC  
COMPANY, et al.  
(Comanche Peak Steam Electric  
Station, Units 1 and 2)

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH  
Docket Nos. 50-445-1  
and 50-446-1

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of  
CASE's Partial Answer to Applicants' Motion for Summary Disposition Regarding Applicants'  
Motion for Summary Disposition Regarding Applicants' Quality Assurance Program for Design  
of Piping and Pipe Supports for Comanche Peak Steam Electric Station -- and -- CASE's 10/18/84  
letter to Applicants re: Documents Request by CASE on Discovery Re: Applicants' Motion for  
Summary Disposition Re: Allegations Concerning QA for Design  
have been sent to the names listed below this 18th day of October, 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

\* Judge Elizabeth B. Johnson  
Oak Ridge National Laboratory  
P. O. Box X, Building 3500  
Oak Ridge, Tennessee 37830

\* Dr. Kenneth A. McCollom, Dean  
Division of Engineering,  
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Oklahoma State University  
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\* Geary S. Mizuno, Esq.  
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Bethesda, Maryland 20814

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

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

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

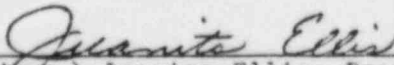
John Collins  
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U. S. Nuclear Regulatory Commission  
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Lanny A. Sinkin  
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Dr. David H. Boltz  
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Dallas, Texas 75224

Michael D. Spence, President  
Texas Utilities Generating Company  
Skyway Tower  
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Dallas, Texas 75201

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

  
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(Mrs.) Juanita Ellis, President  
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