

8/6/84

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

TEXAS UTILITIES GENERATING
COMPANY, et al.(Comanche Peak Steam Electric Station
Station, Units 1 and 2)Docket Nos. 50-445-9 A11:11
and 50-446-1DOCKETED
USNRCOFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHCASE'S ANSWER TO APPLICANTS' MOTION FOR SUMMARY DISPOSITION
REGARDING CONSIDERATION OF FRICTION FORCES IN THE DESIGN
OF PIPE SUPPORTS WITH SMALL THERMAL MOVEMENTS

Pursuant to 10 CFR 2.749, CASE (Citizens Association for Sound Energy), Intervenor herein, files this, its Answer to Applicants' Motion for Summary Disposition Regarding Consideration of Friction Forces in the Design of Pipe Supports With Small Thermal Movements /1/.

CASE's Answer is as stated in the attached CASE's Answer to Applicants' Statement of Material Facts As to Which There Is No Genuine Issue of Fact, which has been prepared in the form of a joint Affidavit and which was prepared under the supervision of CASE witnesses Jack Doyle and Mark Walsh.

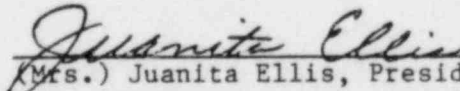
Since the issues discussed are highly technical and complex, CASE could do little more than repeat the statements made by Messrs. Walsh and Doyle, which would serve little purpose and unduly burden the record. This is true with the following exceptions. We do wish to specifically call the Board's

/1/ See discussion of background and procedures to be followed regarding the series of Motions for Summary Disposition on design and design quality assurance (QA) filed by Applicants, contained in the Board's 6/29/84 Memorandum and Order. (Written-Filing Decision, #1: Some AWS/ASME issues, at pages 1-3); see also transcript of 7/26/84 on-the-record telephone conference call.

attention to the discussion under answer 6 (page 6). It appears to CASE that Applicants have made statements which are very misleading and either constitute or border on material false statements. We ask that the Board consider Applicants' statements in that light.

As stated by Messrs. Walsh and Doyle, Applicants' Motion for Summary Disposition does not adequately address the actual issues which have been raised. However, even in the limited context of Applicants' Motion, it is clear from reviewing the answers by Messrs. Walsh and Doyle that there are many genuine issues of fact which are still in controversy. We believe the Board should decide in CASE's favor regarding those issues (as well as regarding the many issues which have not yet been adequately addressed by Applicants).

Respectfully submitted,



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

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