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CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

August 29, 1984

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Dallas, Texas 75224

214/946-9446

Administrative Judge Peter B. Bloch
U. S. Nuclear Regulatory Commission
4350 East/West Highway, 4th Floor
Bethesda, Maryland 20014

Dr. Walter H. Jordan
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USNRC
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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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 OL
CASE's Partial Answer to Applicants'
Motions for Summary Disposition

We are attaching CASE's Answers to the following Motions for Summary Disposition, in accordance with the Board's directives:

Regarding Consideration of Local Displacements and Stresses

Regarding Differential Displacement of Large-Framed, Wall-to-Wall and Floor-to-Ceiling Pipe Supports

Regarding Allegations Concerning Consideration of Force Distribution in Axial Restraints

Regarding the Upper Lateral Restraint Beam

Regarding Applicants' Use of Generic Stiffnesses Instead of Actual Stiffnesses in Piping Analysis

Regarding Safety Factors

As indicated in these Answers, both Messrs. Walsh and Doyle do not feel that they have been able to do an adequate job due to the severe time restrictions under which they have had to work. Likewise, I have been unable to do an adequate job either, and am dispensing with the usual cover letter because I simply do not have time to get them done. I assume that the Board approves of this procedure, under the circumstances. If not, please advise.

As also indicated, Messrs. Walsh and Doyle would like the opportunity to supplement their answers, where appropriate, when new information is received.

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I hope the Board understands that I sincerely mean no disrespect by what I am about to say. I am merely reporting the current situation with CASE, our witnesses, and me.

If the Board is interested in seeing just how much flesh and blood can endure without total collapse, please consider that that limit has been reached and exceeded.

The attached six Answers are the result of superhuman effort on the part of all of us, and Mr. Doyle, Mr. Walsh, and I have all reached the absolute limits of physical and mental endurance (at least for the time being, until we have had a little time to regenerate ourselves). One cannot keep going steadily for 14 to 16 hours a day, seven days a week, day-in and day-out, for weeks on end -- as we have been forced to do to meet the Board's deadlines -- (which is far more than the Board requires of the NRC Staff with its numerous attorneys, witnesses, consultants, typists, secretaries, etc.) without its taking its toll.

We will attempt to meet the Board's deadlines for as long as possible. I have too much to do to continue to file Motions for Reconsideration asking for more time (never knowing whether or not they will be successful). At this point, I am not at all certain that I will physically be able to meet the deadline the Board has set for the welding findings. I have had to make a difficult choice -- the Answers to Motions for Summary Disposition or the welding findings. I have not been able to work on the welding findings for any length of time. Although we do have a few CASE volunteers who are helping with them, there is no one else in our organization who has the background to be able to pull them all together in a logical, orderly fashion for the Board except me. I'll do what I can. As usual, what can't be done won't be. And the record will suffer.

There is one other matter to which I want to call the Board's attention. Contrary to what was stated by Applicants' counsel during the telephone conversation between the Board Chairman, Applicants' counsel, and me on Monday, 8/27/84, it is my understanding from further conversations with Dr. and Ms. Boltz (who attended the 8/23/84 meeting on behalf of CASE) that there is to be a substantive change in at least one Affidavit, regarding Richmond Inserts, and the Applicants' Motion for Summary Disposition. We ask that the Board check with the Staff and Applicants to ascertain whether or not this is true. If it is, CASE strongly objects to having to answer this Motion without having this change and any accompanying documents in hand, and sufficient time to properly review and analyze them. Our answer is currently scheduled to be put in the mail on 9/10/84. We will appreciate the Board's assistance on this.

Sincerely,

CASE (Citizens Association for Sound Energy)

Juanita Ellis
(Mrs.) Juanita Ellis, President

cc: Service List

Attachments