

129

RELATED CORRESPONDENCE

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LAW OFFICES OF

BISHOP, LIBERMAN, COOK, PURCELL & REYNOLDS

1200 SEVENTEENTH STREET, N.W.

WASHINGTON, D.C. 20036

(202) 857-9800

TELEX 440574 INTLAW UI

'84 SEP 28 P4:06

IN NEW YORK

BISHOP, LIBERMAN & COOK
1155 AVENUE OF THE AMERICAS

NEW YORK, NEW YORK 10036

(212) 704-0100

TELEX 222767

WRITER'S DIRECT DIAL
(202)OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

September 28, 1984

Mr. William L. Clements
Docketing & Services Branch
U. S. Nuclear Regulatory Commission
1717 H Street, N.W., Suite 1100
Washington, D. C. 20555

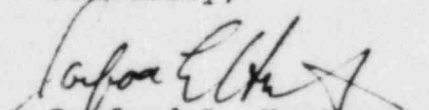
Re: Texas Utilities Electric Company, et al.
(Comanche Peak Steam Electric Station,
Units 1 and 2), Docket Nos. 50-445-2 and 50-446-2

OC-2

Dear Mr. Clements:

Pursuant to 10 C.F.R. § 2.720(e), please find enclosed two subpoenas issued by the Board in the captioned proceeding to Mr. Cory Allen and the Affidavits of Service for both subpoenas.

Sincerely,


Sanford L. Hartman

SLH/as

Enclosures

cc: Service List

8410010248 840928
PDR ADOCK 05000445
G PDR

DS03

United States of America

DOCKETED
USNRC

'84 SEP 28 P4:06

NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the matter of:

TEXAS UTILITIES ELECTRIC COMPANY, et al.

Comanche Peak Steam Electric Station,
Units 1 and 2

TO

Mr. Cory Allen
1102 Columbia
Houston, Texas 77708

DOCKET NO. 50-445 and
50-446

(Application for
Operating Licenses)

YOU ARE HEREBY COMMANDED to appearfor a deposition before an.....
.....official court reporter at the offices of Vinson & Elkins
in the city of ..Houston, Texas at the First City Tower
on the.....15th.....day of.....September.....19.84.....at.....10:00.....O'clock.....A.M.
to testify on behalf of

in the above entitled action and bring with you the document(s) or object(s) described
in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY

[Signature]
Administrative Judge
9/12/84

Bruce L. Downey

ATTORNEY FOR
Texas Utilities Electric
Company

TELEPHONE (202) 857-9800

Case 8409190404

10 C.F.R. 2.720 (f)

On motion made promptly, and in any event
as or before the time specified in the subpoena
for compliance by the person to whom the sub-
poena is directed, and on notice to the party as
whose instance the subpoena was issued, the

presiding officer or, if he is unavailable, the
Commission may (1) quash or modify the sub-
poena if it is unreasonable or requires evidence
not relevant to any matter in issue, or (2) con-
dition denial of the motion on just and reasonable
terms.

RETURN ON SERVICE

Received this subpoena at First City Tower; Houston, Texas on
September 13, 1984 and on Sept. 13, 1984 at 9:00 p.m.
served it on the within named Cory Allen
by delivering a copy to him and tendering to him the fee for one day's
attendance and the mileage allowed by law.¹

Dated September 14, 1984

BY Lillian Kates
Lillian Kates

Service Fees

Travel..... \$
Services..... \$

Total..... \$

Subscribed and sworn to before me, a Notary Public this 14th
day of September, 1984.

B. B. Robinson
B. B. Robinson

NOTE - Affidavit required only if service is made by a person other than a United States
Marshal or his deputy.

¹ Fees and mileage need not be tendered to the witness upon service of a subpoena issued in behalf of the
United States or an officer or agency thereof.

DOCKETED
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 SEP 28 P4:06

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	Docket Nos. 50-445-2 and
TEXAS UTILITIES ELECTRIC)	50-446-2
COMPANY, ET AL.)	
)	(Application for
(Comanche Peak Steam Electric)	Operating Licenses)
Station, Units 1 and 2))	

SCHEDULE OF DOCUMENTS

To: Mr. Cory Allen
1102 Columbia
Houston, Texas 77708

1. All reports, memoranda, letters, charts, and any other documents in your possession which were removed from Comanche Peak;
2. With respect to your employment at Comanche Peak, all memoranda, diaries, letters and other written recordings of events at Comanche Peak; all correspondence and other recorded exchanges to and from CASE, the Government Accountability Project, and the Trial Lawyers for Public Justice, including, but not limited to, all statements and transcripts of statements; all correspondence and other recorded exchanges to and from the Nuclear Regulatory Commission, including, but not limited to, all statements and transcripts of statements; and all tape recordings of conversations in your possession regarding Comanche Peak regardless of whether they were recorded by you or another individual.

Dupl
8/09/90/05

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC
'84 SEP 28 P4:06

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	
TEXAS UTILITIES ELECTRIC)	Docket Nos. 50-445-2 and
COMPANY, ET AL.)	50-446-2
)	
(Comanche Peak Steam Electric)	(Application for
Station, Units 1 and 2))	Operating Licenses)

NOTICE OF DEPOSITION

To: Mr. Cory Allen
1102 Columbia
Houston, Texas 77708

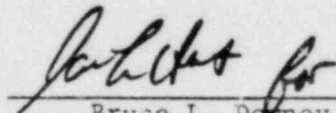
You are hereby notified that Texas Utilities Generating Company will take your oral deposition commencing on Saturday, September 15, 1984 at 10:00 a.m. and continuing until completed. The deposition will be taken at the offices of Vinson & Elkins, First City Tower, Houston, Texas, 77002.

The deposition will relate to allegations made in connection with contention five of the Citizens Association for Sound Energy relating to harassment, intimidation and threats of quality control personnel during construction activities at the Comanche Peak Steam Electric Station. Accordingly, you should be prepared to answer questions as to the date, location and circumstances of each of such allegations of which you have knowledge. You should also bring with you the following:

DN 8409190406

1. All reports, memoranda, letters, charts, and any other documents in your possession which were removed from Comanche Peak;
2. With respect to your employment at Comanche Peak, all memoranda, diaries, letters and other written recordings of events at Comanche Peak; all correspondence and other recorded exchanges to and from CASE, the Government Accountability Project, and the Trial Lawyers for Public Justice, including, but not limited to, all statements and transcripts of statements; all correspondence and other recorded exchanges to and from the Nuclear Regulatory Commission, including, but not limited to, all statements and transcripts of statements; and all tape recordings of conversations in your possession regarding Comanche Peak regardless of whether they were recorded by you or another individual.

The deposition will take place before an Official Court Reporter.



Bruce L. Downey

BISHOP, LIBERMAN, COOK,
PURCELL & REYNOLDS
1200 Seventeenth Street, N.W.
Washington, D.C. 20036
(202) 857-9800

September 12, 1984

United States of America

DOCKETED
USNRC
84 SEP 28 P4:06

NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

DOCKET NO. 50-445-OL2
50-446-OL2

TO Cory Allen
1102 Columbia
Houston, Texas 70008

YOU ARE HEREBY COMMANDED to appear at Goodnight Room, Ramada Inn,
2000 Beach, Beach and Interstate 30
in the city of Fort Worth, Texas
on the 18th day of September 1984 at 1:00 O'clock PM.
to testify on behalf of The Atomic Safety and Licensing Board.

in the above entitled action and bring with you the document(s) or object(s) described
in the following schedule: All documents concerning incidents in which
you believe quality control practices at Comanche Peak departed from
standards of Appendix B or which reflect on: (a) the harassment,
pressuring or intimidation of employees not to report deficiencies or
unsatisfactory conditions, or (b) the resolve of the quality control
supervisors to report, conscientiously, all deficiencies they observed.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY Peter B. Block, Chairman

Peter B. Block

ATTORNEY FOR

Peter B. Block
Administrative Judge

TELEPHONE (301) 492-7479
(202) 363-9133 (Home)

9/12 1984

Dope 8409190408

10 C.F.R. 2.720 (f)

On motion made promptly, and in any event
at or before the time specified in the subpoena
for compliance by the person to whom the sub-
poena is directed, and on notice to the party at
whose instance the subpoena was issued, the

presiding officer or, if he is unavailable, the
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