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WRITER'S DIRECT DIAL
(202)

October 4, 1984

Mrs. Juanita Ellis
President, CASE
1426 South Polk Street
Dallas, Texas 75224

Subj: Texas Utilities Electric Company (Comanche
Peak Steam Electric Station, Units 1 and 2);
Docket Nos. 50-445 and 50-446 *OC*

Dear Juanita:

As you know, the Board ruled during the August 22, 1984, conference call that Applicants need not respond to CASE's extensive discovery requests concerning Applicants' summary disposition motion regarding the design quality assurance program for piping and supports (Tr. 13,999-14,000). The Board also determined that CASE should file its answer to Applicants' motion within 20 days following receipt of certain information the Board had requested from Cygna (Tr. 14,000). The information was transmitted to CASE on August 23, 1984.

Following these events, Applicants informed CASE that irrespective of the Board's ruling we intended to provide the documents you requested which had been referenced and relied on in our motion. We did not expect, therefore, that the twenty day period with which CASE was to provide its answer would begin to run until we completed transmitting those documents. As discussed below, we have now made those documents available to CASE, with the exception of those as to which Westinghouse and ITT-Grinnell have requested execution of a protective agreement. Accordingly, the twenty day period for your reply should commence with the execution of the agreements, and in no event later than October 10.

The documents we have provided include the procedures (including revisions) and guidance material requested by CASE which are referenced and relied on in our motion. These documents consist of over 4000 pages of material. The item

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numbers of the specific requests (as set forth in your August 15, 1984, letter) to which we have responded are, as follows:

1-22, first 28 (no documents), 30-34, 51-55,
59-60, 62-66,¹ 68-83, 87-90, 92, 93, 95, 100,
101, 104, 105 (included with 55), 106-08
(same as 68-69, 75)

The material not provided generally involves matters the content of which are not relied upon in our motion, such as technical specifications (3, 4), individual audits (23-27, 29, 35-39, 46-50, 56-58, 84, 102, 103, 114 and 117),² ANI procedures and documents (109-113), individual nonconformance reports (140) and logs thereof (120). Some requests seek information which is simply beyond the scope of the motion, such as number of nonconformance documents (119), ANI contract terms and organizational structure (127-131), support upgrade procedures (132-135), information relating to specific I&E Reports (136-139), and management reviews (141, 142). Finally, other requests involve matters which to the extent relevant are already discussed in the motion itself, viz., methods to document nonconforming conditions (118) and trending mechanisms (121-126).

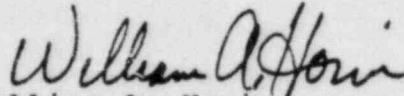
The only requests not addressed above are those involving the procedures of Westinghouse and ITT-Grinnell (second 28, 40-45, 61, 67, 85, 86, 94, 96-99) covered by the protective agreement we transmitted to you on September 29, 1984. As I requested in our phone conference yesterday, you should contact me promptly if you have any questions concerning those agreements. I will forward the subject documents to you immediately upon execution of the agreements. As we agreed in our discussion earlier today,

¹ Item 64 is a computer listing which is continuously updated. We provided a sample page from a recent printout of that list.

² We address in the motion the existence of various audit programs and mention only the number of different audits conducted. We have provided the relevant procedures for those programs, if requested. You will note we provided examples of many of the audits as attachments to the motion.

there is no reason execution cannot be completed by October 9, at which time I will transmit the subject documents. Accordingly, the twenty day period for your response will commence October 10.

Sincerely,

A handwritten signature in dark ink, appearing to read "William A. Horin". The signature is fluid and cursive, with the first name "William" and last name "Horin" clearly distinguishable.

William A. Horin
Counsel for Applicants

cc: Service List