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April 10, 1985

Mr. Anthony Z. Roisman
Government Accountability Project
1555 Connecticut Avenue
Suite 202
Washington, D.C. 20036

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

Dear Mr. Roisman:

This letter is in response to your letter to me dated March 29, 1985. In that letter you made two informal discovery requests concerning the harassment and intimidation portion of the Comanche Peak proceeding: First, you requested that Applicants update their prior document productions, and second you requested that Applicants propose a schedule for the "final" depositions of Messrs. Vega, Chapman, and Tolson.

Applicants will promptly conduct a file search for documents prepared since Applicants' last document production that are responsive to Intervenor's outstanding requests. If this search uncovers any new, responsive documents concerning events occurring prior to June 30, 1984, Applicants will either produce the documents for inspection and copying or object to their production on or before April 22, 1985.

Applicants, however, are not agreeable to making Messrs. Vega, Chapman, or Tolson available for what you describe as their "final" depositions. The testimony of these witnesses already covers approximately ten full days of transcripts, and the time for taking their depositions is past. Moreover, the evidentiary record of the harassment and intimidation proceeding is now closed except for the completion of the O. B. Cannon testimony, presentation of the NRC Staff's evidence, and the presentation of Applicants' rebuttal case. Accordingly, there is simply no point to the depositions you propose unless Applicants decide to call Mr. Vega, Mr. Chapman, and/or Mr. Tolson as rebuttal witnesses, a decision that has not been made, and even then only on their rebuttal testimony.

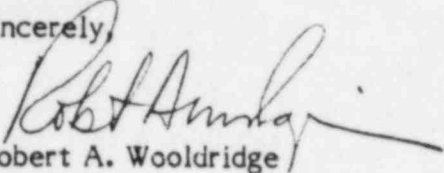
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Mr. Anthony Z. Roisman
April 10, 1985
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If our document search uncovers any responsive documents, we will contact you informally to arrange the logistics of the production.

Sincerely,


Robert A. Wooldridge

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cc: Service List