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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Robert Wooldridge, Esquire
Worsham, Forsythe, Sampels
& Wooldridge
2001 Bryan Tower, Suite 2500
Dallas, Texas 75201

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 Bob:

This letter responds to your letter of April 10, 1985. First, due to an apparent clerical error the letter was sent to me at the address of the Government Accountability Project (GAP). This delayed my receipt of the letter by several days since I have no connection with GAP and had to wait for Billie Garde to bring it to me. Please have your secretary correct her mailing labels to reflect the address for Trial Lawyers for Public Justice.

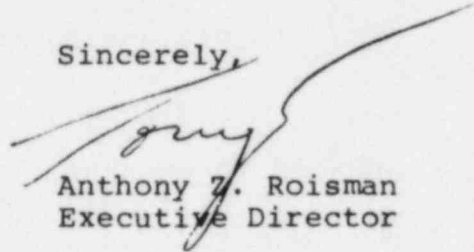
Second, in agreeing to update prior document production you indicated that documents would be produced if they related to "events occurring prior to June 30, 1984." I am concerned that you and I may have different interpretations of that phrase. I understand the Board's limit on harassment and intimidation events to limit the hearings -- for the present time only -- to harassment and intimidation which occurred on or before June 30, 1984. However, subsequent events directly related to that harassment and intimidation are not excluded. For instance, if an employee were subjected to alleged harassment and intimidation on May 5, 1984, complained of it to the ombudsman on July 10, and the company took action in response to the complaint at some later date, all of the documents related to the original harassment and intimidation including the ombudsman report and company response would be included in our outstanding discovery request. If you disagree with this view please include the basis for your disagreement in your April 22 response.

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Third, I cannot accept your position on the unavailability for further discovery of Messrs. Vega, Chapman, Tolson and others who no longer hold QA/QC responsibilities at the plant but were used as key witnesses by Applicant to support their QA/QC program. If a principal reason for the departure of these key people is that the company is dissatisfied with the performance of their duties then that is surely relevant in weighing the credibility and force of their prior testimony. Conversely, if the company remains fully satisfied with their past work and their departures are unrelated to the wide-ranging breakdown of the QA/QC program identified by the TRT then that is clearly relevant in assessing management character and competence and in assessing the extent to which Applicant's proposed corrective actions will be satisfactory. In either event discovery related to the circumstances surrounding the departures of these key people is clearly relevant and, since the departures occurred recently, is undoubtedly timely. I renew my request for establishing a schedule for deposing the former key QA/QC managers at Comanche Peak including Messrs. Vega, Chapman and Tolson.

Sincerely,



Anthony Z. Roisman
Executive Director

cc: Service List