

989
RELATED CORRESPONDENCE
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter of) Docket Nos. 85 JUL 29 11:07
) 50-445-2
TEXAS UTILITIES ELECTRIC) and 50-446-2
COMPANY, et al.)
)
(Comanche Peak Steam Electric) (Application for an
Station, Units 1 and 2)) Operating License)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CASE INTERROGATORIES
REGARDING PREMATURE IMPLEMENTATION
OF CPRT

Pursuant to the Nuclear Regulatory Commission Rules of Practice, please answer the following interrogatories and requests for documents in the manner set forth herewith:

1. Each interrogatory should be answered fully in writing, under oath or affirmation, and should include a sworn statement of the truthfulness of the answer, signed by the specific individual who answered and has personal knowledge of the matter under discussion.

2. Each document should include all pertinent information known to : Applicants, their officers, directors, or employees, their agents, advisors, or counsel.

The term "employees" is to be construed in the broad sense of the word, including specifically (but not limited to): Brown & Root, Gibbs & Hill, Ebasco, Cygna, O.B. Cannon, any consultants, sub-contractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors.

3. The terms "documents" and "documentation" shall be con-

strued in the broad sense of the words and shall include any and all writings, graphs, charts, photographs, reports, studies, audits, microfiche, slides, internal memoranda, informal notes, handwritten notes, tape recordings, procedures, specifications calculations, analyses and any other data compilations from which information can be obtained. Include print-outs of any and all such information which are contained on computer discs or in computerized files or similar files.

The term "documents" shall also include any and all contracts, letters of understanding, letters of intent, purchase orders, statement of protocol, statement of scope, any and all other related or similar documents, and all other pertinent information.

4. Each document provided should include a sworn statement of its authenticity, signed by each specific individual who has personal knowlege of the document.

5. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.

6. Identify the person providing each answer, response, or document.

7. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the past directives of the Licensing Board. Because of the time restrictions under which we are presently working, we request that supplementation be made on an expidited basis.

8. For each item supplied in response to a request for documents, identify it by the specific question number to which it is

in response. If the item is excerpted from a document, identify it also by the name of the document.

REQUESTS

1. What reinspection effort has been completed to date on issues identified by the NRC's Technical Review Team?

2. Identify each system, component, or piece of hardware which has undergone any review, or reinspection by Texas Utilities or any of its contractors.

3. For each system, component, or piece of hardware which has been reviewed or reinspected identify the person, persons and/or organization conducting the reinspection.

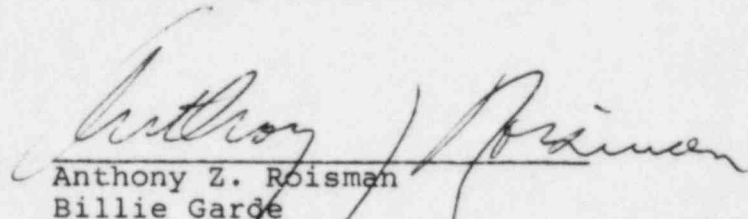
4. For each system, component, or piece of hardware which has been reviewed or reinspected identify and produce the procedures used to conduct the reinspection or review.

5. For each system, component, or piece of hardware which has been reviewed or reinspected identify the results of the reinspection or review; if no documentation was produced to record specific findings identify for deposition the person or persons who conducted the analysis.

6. For each system, component, or piece of hardware which has been reviewed or reinspected identify all trending documents prepared which detail the significance of the identified problems.

7. For each system, component, or piece of hardware which is to be reviewed or reinspected in the CPRT effort (including the self-initiated evaluations) provide a schedule of when such reinspection will commence.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Anthony Z. Roisman", is written over a horizontal line.

Anthony Z. Roisman
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Counsel for CASE

July 25, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'85 JUL 29 A11:07

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
Docket Nos. 50-445-2
and 50-446-2

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of CASE's CASE Interrogatories Regarding Premature Implemenation Of CPRT have been sent to the names listed below this 25th day of July, 1985, by: Express mail where indicated by *; Hand-delivery where indicated by **; and First Class Mail unless otherwise indicated.

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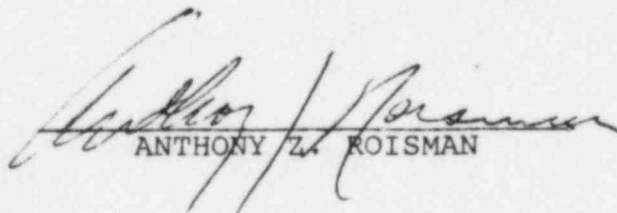
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