

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 85 MAY 29 P3:45

In the Matter of)		OFFICE OF SECRETARY
)	Docket Nos. 50-445-2 and	DOCKETING & SERVICE
TEXAS UTILITIES ELECTRIC)	50-446-2	BRANCH
COMPANY, <u>et al.</u>)		
)	(Application for	
(Comanche Peak Steam Electric)	Operating Licenses)	
Station, Units 1 and 2))		

APPLICANTS' MEMORANDUM REGARDING
SUPPLEMENTAL DOCUMENT PRODUCTION

By letter dated March 29, 1985 Citizens Association for Sound Energy (CASE) requested that Applicants supplement their prior document productions in this Docket. This request specifically sought, intra alia, all documents, QAI files, exit interviews, hot line investigations, and SAFETEAM reports prepared since Applicants' last document production that relate to alleged incidents of harassment and intimidation which occurred prior to July 1, 1984. With the exceptions noted below, all such documents will be made available for inspection and copying at the office of Counsel for Applicants on May 24, 1985. Representatives of Intervenor wishing to review the documents at times other than that set forth above should contact Counsel for Applicants.

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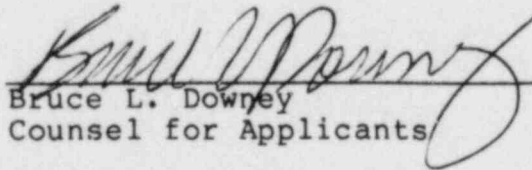
OBJECTIONS TO PRODUCTION

1. Applicants' SAFETEAM files contain one responsive report. Applicants object to the production of this document on the grounds that the individual raising the matters addressed in the report requested confidentiality. In addition, one responsive QAI file concerns matters raised by an individual who has requested confidentiality and on that basis Applicants also object to its production. Applicants, however, will make these documents available to CASE if CASE's representatives agree to treat the information in the documents in accordance with the Protective Order in effect in this proceeding.

2. Applicants also object to the production of all documents within the scope of Intervenor's request that were prepared by and at the direction of counsel. Such documents include notes, letters, memoranda, draft pleadings, summaries of testimony and the like prepared in anticipation of and during the hearings in this matter.

3. Finally, Applicants object to the production of certain portions of QAI-003 on the grounds that such portions of the QAI are comprised of advise provided by Counsel. Applicants have provided the balance of QAI-003.

Respectfully submitted,


Bruce L. Downey
Counsel for Applicants

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May 29, 1985

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) (Application for
(Comanche Peak Steam Electric) Operating Licenses)
Station, Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of Applicants' Memorandum Regarding Supplemental Document Production, in the above-captioned matter was served upon the following persons by deposit in the United States mail, first class, postage prepaid or by hand delivery (*) on this 29th day of May, 1985.

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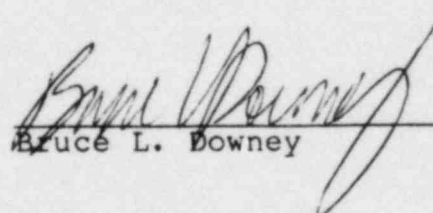
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