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June 5, 1985

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BRANCH

Bruce Downey, Esquire
Bishop, Liberman, Cook,
Purcell & Reynolds
1200 17th Street, N.W.
Washington, D.C. 20036

RE: Comanche Peak Steam Electric Station

Dear Bruce:

After reviewing the files you provided in response to my letter of April 16 I have decided we want to get a copy of all the materials provided. I propose we send it out to be copied and we will pay the copying bill directly. If this is agreeable please contact me and I will arrange for the copying service.

During my review of the documents I noticed that QAI0027 is missing although it is referenced in 0022 & 0023 and apparently all three were processed at or close to the same time. Do you know what happened to 0027? Also QAI001, 002, 007, and 0014 were not included. Am I correct in assuming that the reason for their exclusion is that nothing was added to those files since you last made disclosure to us? If not, please let me know the reason for their omission.

With respect to your objections to production we need more information to evaluate the claim. Is it your position that material prepared by Brown and Root or TUGCO employees at direction of counsel but as part of the actual resolution of the

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A PROJECT OF THE CITIZENS LEGAL CLINIC

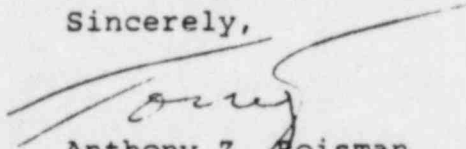
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Bruce Downey, Esquire
June 5, 1985
Page Two

allegations is not producible? If not, what is the exact nature of the kind of material for which you are claiming privilege? A further elaboration of your position will help us determine whether or not to file a motion to compel.

Thank you for your courtesy in these matters.

Sincerely,



Anthony Z. Roisman
Executive Director

AZR:dle

cc: Service List (Docket 2)