

CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

1426 S. Polk
Dallas, Texas 75224

214/946-9446

RELATED CORRESPONDENCE

August 14, 1985

DOCKETED
USNRC

FEDERAL EXPRESS

*85 AUG 19 P12:06

Mr. Vincent S. Noonan, Director
Comanche Peak Project
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Subject: In the Matter of
Texas Utilities Electric Company et al.
Comanche Peak Steam Electric Station,
Units 1 and 2
Application for an Operating License
Docket Nos. 50-445 and 50-446

CASE's First Critique of Applicants'
Comanche Peak Response Team (CPRT) Plan

Dear Mr. Noonan:

CASE appreciates this opportunity to present some input into the Staff's consideration of Applicants' CPRT Plan, although we are disappointed that the Staff chose not to await any of CASE's specific comments before filing its NRC Staff Evaluation of the Comanche Peak Response Team Program Plan (which CASE obtained a copy of yesterday, 8/13/85).

We want to make very clear at the very outset, however, that CASE's presentation of these specific criticisms of the CPRT Plan should not be construed as changing CASE's basic position: that Comanche Peak is unlicensable in its present condition, and that, at a minimum, a 100% reinspection is needed of both design and construction.

CASE does not consider the Applicants' CPRT Plan to be adequate -- or to have the capability at this point in time of becoming adequate (due to

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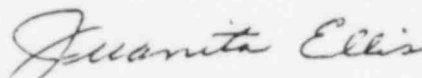
the basic and fundamental failure early on to assure that it would be an independent protocol-controlled effort) -- to assure that Comanche Peak has been designed and constructed such that the public health and safety will not be jeopardized.

In addition, CASE does not consider the Plan to be adequate for the specific detailed reasons discussed in the attached. Even though our first initial response was necessarily very rushed and allowed only a partial assessment at this time, and though we were working under the handicaps of the lack of specificity in the Plan and the lack of necessary documents, it is obvious that there are major and very fundamental flaws in the Plan which will doom it to failure and end up proving nothing.

Again, thank you for the opportunity for us to have this input (albeit after the Staff's tentative decision). We will be filing additional specific critiques in the future.

Respectfully submitted,

CASE (Citizens Association for Sound
Energy)



(Mrs.) Juanita Ellis
President

cc: Service List -- Docket 1

Administrative Judge Herbert Grossman

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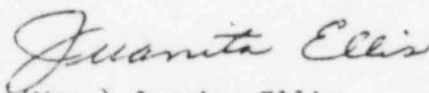
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	}}	
	}}	
TEXAS UTILITIES ELECTRIC	}}	Docket Nos. 50-445-1 and -2
COMPANY, <u>et al.</u>	}}	and 50-446-1 and -2
(Comanche Peak Steam Electric	}}	
Station, Units 1 and 2)	}}	

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of
CASE's Motion for Immediate Board Order for Applicants to Preserve Evidence;
CASE's First Critique of Applicants' Comanche Peak Response Team (CPRT) Plan,
and cover letters to Licensing Board and to Vincent Noonan

have been sent to the names listed below this 14th day of August, 1985,
by: ~~EXPRESS MAIL~~ where indicated by * and First Class Mail elsewhere.
Federal Express

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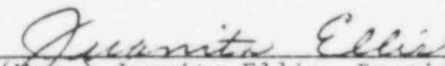
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