

388
RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

8/27/85
DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

*85 AUG 30 A10:44

In the Matter of

TEXAS UTILITIES ELECTRIC
COMPANY, et al.

(Comanche Peak Steam Electric
Station, Units 1 and 2)

Docket Nos. 50-445
and 50-446

(Application for an
Operating License)

CASE'S 8/27/85 INTERROGATORIES
TO APPLICANTS AND REQUESTS TO PRODUCE

Pursuant to the Board's 8/26/85 Memorandum and Order (Current Status of Discovery), please answer the following interrogatories and requests for documents. Please answer 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 interrogatory or document response 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 and 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.

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3. The terms "documents" and "documentation" shall be construed in the broad sense of the words and shall include any and all writings, drawings, graphs, charts, photographs, reports, studies, audits, 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 is 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 the specific individual who answered and has personal knowledge 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 expedited 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. Please also provide the copies in the correct order (rather than in reverse order).

CASE'S INTERROGATORIES TO APPLICANTS AND REQUESTS TO PRODUCE

CASE has attempted not to request information which has already been provided or which has been requested in other pleadings. However, if any information which is requested has already been provided, please indicate the date of the cover letter by which such information was provided.

For your convenience and to assist in promptly identifying the information which is being requested, we are wherever possible referencing specific meeting transcript pages or other identifying information. However, this should not be construed as limiting our requests.

Transcript of June 13, 1985 Meeting: Volume I/Morning Session (NRC/TUGCO):

1. Please provide a complete copy of each and every implementation plan which were or are still to be made available to the NRC staff on site. (Tr. 12/21-22.)
2. Please provide all available information on each and every person who has now been hired or who is yet to be hired to "fill in the blanks on (Mr. Council's organizational) chart(s)". (Tr. 15/23-26/2; etc.)

Please provide a complete resume for each individual so named, and give all information (e.g., name, title, responsibilities, etc.) on the position he or she is/will do with TUGCO.

6/13/85 Tr. (A.M.) - continued:

3. Please provide the names, titles, position, responsibilities and complete resume on each individual who is in the second and third tiers under the management tiers given on Mr. Council's charts. Please note which, if any of these individuals is not a full-time TUGCO employee and which are. For each person who is not a full-time TUGCO employee, please provide full information on his or her employer, contractor, etc. and if that company, contractor, etc. has been hired as a consultant for the Comanche Peak project.
4. Please provide current updates in changes in positions and/or titles for each of the persons on each of Mr. Council's organizational charts. In particular, give complete information on each and every new individual who has been hired and/or transferred from another position to those positions, each and every person (e.g. Beck--Tr. 18/18-20--who was "filling in as manager of nuclear full (sic) and safety analysis" and George--Tr. 18/15-17-- who was "filling (in) as manager of engineering") now in those (and every other) spot.
5. Please provide a complete set of all allegations filed with the SAFE Team since its inception along with a complete copy of each and every response by the Company. (NOTE: All documents may have informant's names stricken.) (Tr. 25/5-7.)
6. Please provide a complete copy of an updated resume for each and every member of the CPRT team mentioned any time or any where on the organizational charts, or by members of the CPRT team speakers as being superiors, subordinates, or co-workers on the CPRT effort. This includes both TUGCO personnel and all consultant personnel whether loaned to TUGCO or working under contract to TUGCO.
7. Please provide a complete copy of each and every document summarizing, listing, outlining, compiling, etc. the back fit activities under Mr. John Marshall's work on the CPRT effort. (Tr. 33/3-9.)
8. Please provide a current listing of each and every pre-operational test, re-test, etc. which remains to be done or which has been done following the June 13th meeting for Unit 1. In addition, please provide the current status for any waivers or deferrals of any of these tests which the Company has or will request from the NRC for permission to do them after fuel load. (Tr. 40/8-12.) In addition, please list the currently anticipated test date for each one.
9. Please provide a complete copy of all documentation received after the June 13th meeting regarding updates on the diesel generator issues (both from the Owners Group and from the NRC.) (Tr. 42/4-16.)
10. Please provide a complete transcript of each and every meeting held after June 13, 1985 (if not already provided) between Applicant and Cygna concerning Cygna's concerns, the CPRT, etc. (Tr. 66/19-21.)

11. Please provide a complete copy of each and every document documenting the contract(s) between TUGCO and each and every consultant, firm, and/or company working on the CPRT effort. Include with this documentation any letters of authorization (or similar documents by any other name) telling exactly what their scope of work is, who they are responsible to, etc.; copies of the minutes of each and every meeting between each one and the CPRT personnel, copies of telecoms, etc. (Cf. Tr. 76/10-17.)

NOTE: If any of these consultants have contracted under Gibbs & Hill and/or Brown and Root, please provide all the documentation requested above on each of them.

We note that we have already received some of the contracts requested; however, we have not received any of the other information requested (such as letters of initial contact, telecoms, handwritten notes, letters of understanding, letters of intent, statement of protocol, statement of scope, or other such related or similar documents or information). Also, we are not certain that we have received all of the purchase orders/contracts.

12. Please provide a complete copy of each and every bi-weekly (or whatever interval is used) briefing notes, papers, and or other informal or formal documentation of the briefings made to Mr. Council on the progress of the Stone & Webster/ Bob Cloud & Associates piping and pipe support effort in conjunction with the CPRT. (Tr. 77/1-17).
13. Please provide a complete copy (of all revisions) of the CPRT charter (or similar documentation, if not by that name) delineating the group's purpose, powers, etc. (Tr. 86/14ff)
14. Please provide a complete copy of each and every document of CPRT activities and records kept in the CPRT project files from the inception of the effort to date. (Tr. 88/21-23.)
15. Please provide complete copies of each and every document added to the CPRT project file on a weekly updating basis beginning with the first document added to the file after the response was given to Request 14 above.
16. Please provide a complete copy (all revisions) of the CRPT guidelines for determining safety significance of items brought to the CPRT's attention. (Tr. 89/19-90/7.)
17. Please provide a complete copy of each and every instance of noting and/or evaluation by the CPRT of issues related to compliance with licensing commitments. (Tr. 90/12-19).
18. Please provide the definition of "safety significant" or "safety significance" being used by the CERT. (Tr. 91/9-14.) If it was the same during the meeting as what is shown in the CPRT Plan, please so state. Include in your answer any and all documents (in the broad sense of the word, as defined on page 2) related to discussions, meetings, etc., during which the derivation of the definition was discussed.

6/13/85 Tr. (A.M.) - continued:

19. Please provide complete documentation done by the CPRT that clearly identifies any areas where the Company is not in compliance with FSAR commitments or with other commitments which they have made. (Tr. 92/4-10.)

Please also provide a complete copy (all revisions) of each and every NCR (and/or similar document used to document such a deviation, etc.) written to document the finding of such non-compliance with an FSAR or other commitment. (Tr. 92/11-19.)

20. Please provide the current list of all design changes which will need to be submitted for staff review, and those which are pending staff review. (Tr. 96/6-9.) In addition, please provide all documentation of each and every item listed in response to the above, including each and every staff response, meeting transcript, etc.

(Note: Please provide additional information updating each item on this list, and on items added later to the list, as it becomes available.)

21. Please provide a complete copy of each and every CPRT "wrap-up report" (Tr. 117/4) and "results report" (117/11) in the CPRT project file.
22. Please list for each CPRT action plan which group's QA/QC plan will be in effect. (Or, alternatively, list only those which have a QA/QC plan different from TUGCO's, and state in writing that all others are under TUGCO QA/QC.) Please provide the name of the group's QA/QC program for each action plan which is not TUGCO's. (Tr. 125-127.)

Transcript of June 13, 1985 Meeting: Volume II/Afternoon (TRC/TUGCO)

1. Please provide all information relating to the CPRT's consideration of the implications of SSER 11, including Appendix P. (Tr. 145/19-146-24.) In addition, please provide a complete copy of all documents filed with the NRC regarding such CPRT work.
2. Please provide complete documentation of all instances of confirmation of allegations of harassment and intimidation by TUGCO. (Tr. 150/7-11.)
3. Please provide a complete copy of the complete detailed list of sources and inputs to each issue, along with a cross-reference for each outstanding issue in the comprehensive action list (CAL) per TRT member Calvo's request. (165/7-25.)
4. Please provide a copy of all documentation provided to TRT member Livermore in response to his request for an identification of all QA/QC issues raised in each SSER and a correlation to where the CPRT's response can be found in each specific action plan, along with some kind of conclusion for each. (Tr. 178/12-179/17.)
5. Please provide a complete copy of each and every NCR sent to the project management regarding the CPRT's recommendations for corrective action on specific items of the plan. (Tr. 184/7-9.)
6. Please provide a complete copy of each and every notification (of whatever name or form) sent to the senior review team by the CPRT notifying them of recommendations for programmatic changes and/or problems on specific items of the plan. (Tr. 184/11-12.)
7. Provide a copy of the summary of harassment and intimidation information provided to Mr. Hansel through the attorneys. Also provide any and all documentation of Mr. Hansel's statement that he had researched that list himself to satisfy himself that each of those items were in fact covered in one of the CPRT current issues specific plans. (Tr. 161/11-17.)

Transcript of June 14, 1985 Meeting: Volume I/Morning Session (TRT/TUGCO)

1. Please provide the "road map" showing where each Cygna identified issue is treated within the CPRT program plan and within each specific action plan. (Tr. 16/13-16.)
2. Please provide complete documentation on each and every walkdown done by CPRT personnel from any issue area. (Tr. 29/12-21.) Include with such documentation all procedures, checklists, etc. used for each walk-down.
3. Please provide a complete copy of each and every attribute list developed for the CPRT personnel to use in determining which items are deviations, which are deviations, which are deficiencies, etc. per CPRT member Levin's promise to TRT members Calvo and Bosnak (Tr. 51/13-16, 20 and 53/3-5).
4. Please provide a complete copy of each and every evaluation done by CPRT and/or TUGCO personnel regarding industry and NRC design verification-type programs such as IDVP's and IDI's in order to arrive at the CPRT's profile of the scope for its design adequacy program. (Tr. 80/13-22.)
5. Please provide a complete copy of each and every comparison, etc. done by the CPRT regarding the scope of each and every previous evaluation done on the CPSES project. (Tr. 80/23-81/3.)
6. Please provide a complete copy of each and every IDVP and IDI reviewed by the CPRT when performing the evaluations noted in Question No. 4 above. (Cf. also: Tr. 82/25-83/9 which list the following: Callaway, Seabrook, Byron, Harris IDI's and the Midland and Diablo Canyon IDVP's.)

Transcript of June 14, 1985 Meeting: Volume II/Afternoon Session (TRT/TUGCO)

1. Please provide a complete copy of each and every set of procedures that Stone and Webster normally would use in the design and analysis of piping and pipe supports and a complete copy of the entire set of procedures which have been modified for use in Stone and Webster's portion of the CPRT effort. (Tr. 188/16-189/7.)
2. Please provide complete documentation of all of Stone & Webster's analysis/reanalysis of its portion of the CPRT effort.
3. Please provide a complete copy of Stone & Webster's program plan for its portion of the CPRT effort (all revisions). (Tr. 205/3-5).
4. Please provide a complete copy (all revisions) of the operator retraining, requalification program referred to by Mr. Council. (233/14-17.)
5. Please provide a complete copy of all documentation related to the operator retraining, requalification program (see Question No. 4 above).
6. Please supply answers to the questions asked by CASE President Juanita Ellis at the end of the 6/14/85 meeting (this is the same information requested informally during the 6/14/85 meeting and again in CASE's 6/24/85 letter to Applicants' counsel Mr. Wooldridge, at page 2, item 3). (Tr. 234-261 generally; if this is not adequate information for you to be able to identify the specific questions, please advise and we will be even more specific, and perhaps expand on them some.)

July 2, 1985 Meeting (Region IV Staff/TUGCO)¹:

1. Please provide a complete copy of the detailed study provided to the Region IV staffmembers at the July 2, 1985 meeting between Region IV staffmembers and TUGCO personnel regarding TUGCO's decision to visually inspect painted non-pressure boundary welds.
2. Please provide a complete copy of all records of that meeting, including but not limited to: meeting transcript(s); tape recording(s) of the meeting; notes taken by participants at the meeting; handouts given out before, during, or after the meeting; memoranda or other written communications announcing, or planning the meeting; memoranda or other written communications summarizing, or following up on the meeting; etc. (Please answer based on information available from all meeting attendees, Company files, etc.)
3. Please provide a complete list of all TUGCO and other personnel of Applicant at the meeting. Please include job title and the name of the TU-related organization with whom they work. (NOTE: If any of the attendees were employed by consultants to Applicant, or by Applicant's attorneys, please also so state each of these individuals name and position and employer's name.)
4. Please provide a complete list of all Region IV staffmembers who attended the meeting, along with their job title.
5. Please provide a complete list of all NRC personnel who attended the meeting who were not members of Region IV staff. (NOTE: If any of the attendees were employed by consultants for any branch of the NRC, or are associated with any of the NRC's legal divisions, please so state each of these individuals name, position, and branch name, as well.)
6. Please answer the following questions regarding the setting up of the meeting, giving the names and job titles and employer's name for each individual cited:
 - a. Who (both from TUGCO, any other of Applicant's subsidiaries, consultants, or attorneys, or from the Region IV office of the NRC, or any other of the NRC's regions or branches, consultants, or attorneys) planned the July 2, 1985 meeting regarding visual inspection of painted non-pressure boundary welds?
 - b. When was the date set for the July 2, 1985 meeting and by whom?
 - c. Was Mr. Vincent Noonan, Director of the Comanche Peak Project for the Office of the Director of Nuclear Reactor Regulation, informed that such a meeting was to be held on July 2, 1985 and the topic to be discussed?

¹ All questions relate to the meeting referred to in the letter dated August 1, 1985 from Mr. William G. Counsil (TUGCO) to Mr. Vincent S. Noonan (NRC) (Log #TXX-4524, File #10010, regarding Visual Inspection of Painted Non-Pressure Boundary Welds (CPSES).

- (1) If so, please provide a copy of all material documenting that notification.
 - (2) If not, please fully explain why Mr. Noonan was not so notified.
- d. Was any member of Mr. Noonan's staff, other than Mr. Noonan himself, informed that such a meeting was to be held on July 2, 1985 on the topic that was discussed?
- (1) If so, please provide a copy of all material documenting that notification.
 - (2) If not, please fully explain why no member of Mr. Noonan's staff was so notified.
- e. Was Mrs. Juanita Ellis, President of CASE, informed that such a meeting was to be held on July 2, 1985 on the topic that was discussed?
- (1) If so, please provide a copy of all material documenting that notification.
 - (2) If not, please fully explain why Mrs. Ellis was not so notified.
- f. If either CASE and/or Mr. Noonan's staff were not informed in advance of the July 2, 1985 meeting regarding the visual inspection of painted non-pressure boundary welds, please state who (name, title, organization) made that decision and when.
7. Please fully document the basis for the assertion on page 1² that visual re-inspection of painted welds is "not without precedent in the industry". Please provide complete copies including, but not limited to of: each and every review, evaluation, study, procedure, etc. used by each such utility & approved by the NRC.
8. Please fully document the basis for Applicant's decision to limit the weld attributes "considered critical to strength" to those listed on page 1 of Mr. Council's letter.
9. Please fully document the basis for Applicant's assertion that all of attributes listed on page 1 of Mr. Council's letter "are detectable and measurable through a paint coating of the type and thickness found at Comanche Peak".
10. Please fully document^{the basis for} the assertion made on page 1 of Mr. Council's letter that the type and thickness of the paint coating at Comanche Peak is "a primer and epoxy topcoat averaging approximately 10 mils".
11. Please fully document the assertions made on pages 1 and 2 of Mr. Council's

²Letter dated August 1, 1985 from Mr. William G. Council to Mr. Vincent S. Noonan (Log #TXX-4525, File #10010).

letter that "several independent NRC inspections of support welds, including the recent TRT, reported no evidence of cracking" and "several independent and separate reviews (including the NRC) . . . indicate no evidence of weld cracking".

12. Please provide all documentation relied on by Applicant as the basis for the statement on page 2 of Mr. Council's letter that: "From a metallurgical standpoint, there is no reason to suspect weld cracking problems. The materials used are readily weldable, compatible with the electrodes, and historically produce welds which are not prone to cracking."
13. Please provide all documentation relied on by Applicant as the basis for the statement on page 2 of Mr. Council's letter that: "Undercut is readily detectable through paint. In fact, evidence has shown that paint tends to emphasize undercut if it exists."
14. Please provide all documentation relied on by Applicant as the basis for the statement on page 2 of Mr. Council's letter that: "Regardless, both undercut and overlaps are only significant where fatigue loading is a factor."
15. Please provide all documentation relied on by Applicant as the basis for the statement on page 2 of Mr. Council's letter that: "Fatigue loading is not a factor for these welds".
16. Please provide complete copies of all documentation relied on by Applicant as the basis for the statement on page 2 of Mr. Council's letter that: "similar inspections were allowed by the NRC at Wolf Creek Generating Station."
17. Please provide complete copies of the allegedly "similar inspections", procedures, etc. which were allowed by the NRC at Wolf Creek (see Question No. 16.)
18. Please provide complete copies of the allegedly "similar analyses by independent consultants" (see page 2 of Mr. Council's letter) upon which "visual inspections of painted fillet welds were conducted on safety-related structural steel" at Wolf Creek.
19. Please provide a complete copy of the "evaluation of the welding history at Comanche Peak" (page 2 of Mr. Council's letter) which led Applicant to the conclusion that only one inspection attribute (weld undersize) has been noted recurrently on NCRs, in the TRT report, and in "other" NRC inspection reports.
20. Please provide all documentation relied on by Applicant as the basis for the statement on page 2 of Mr. Council's letter that: "In summary, there does not appear to be evidence of a significant or generic problem associated with the non-pressure boundary welds or the welding program at Comanche Peak."

21. Referring back to Question No. 8 and your answer to it, please explain all differences (if any) between those attributes listed as "considered critical to strength" and those attributes which may be termed "significant, strength-related" (page 2 of Mr. Council's letter).
22. What criteria was used by Applicant to deem some strength-related attributes to be "significant" or "critical" and others not? Please provide complete copies of all documentation relied on by Applicant as the basis for making such a determination.
23. Please identify each and every code section and/or NRC regulation which was relied on in arriving at the conclusions in Applicants' letter, including the specific code (such as AWS, ANSI, ASME, etc.), the date of each code section or Reg Guide, etc. If the document relied upon is not easily available, please provide a copy of it for inspection and copying.
24. Please provide complete copies of all review(s) and/or engineering evaluations performed by Gibbs & Hill which forms the basis for the acceptance criteria and which "concluded that the criteria are applicable to the non-ASME structural welds at Comanche Peak". (Cf. page 3 of Mr. Council's letter.)
25. If any consultant's analysis, report, etc. was used as the basis for any of Applicants' conclusions, please provide a copy of each and every such document. In addition, provide a copy of the contract, letter of intent, purchase order, etc., for each such consultant's work.
26. Please provide complete copies of each and every document which documents how, when, where, and which inspectors was trained to the new criteria (Cf. p. 3).
27. Please provide complete copies of each and every inspection procedure using the new criteria (see Questions 23-25).
28. Please provide complete copies of all written documentation supporting the assertion on page 3 of Mr. Council's letter that: "Naturally, should an inspector feel that he is unable to provide an adequate inspection on any particular weld because of its coating, he will be encouraged to have the paint removed to allay any doubts." (This documentation should include, but not be limited to, copies of memoranda to workers, letters, posters, etc.)
29. Please provide all other documentation upon which Applicant relied in coming to its conclusion to conduct the reinspection of non-pressure boundary welds (ASME-NF and AWS) without removal of protective coatings, which was not provided in response to Questions Nos. 1-28.
30. Will any welds other than ^{non pressure boundary} ASME-NF and AWS be reinspected as part of the CPRT effort?
31. If the answer to Question No. 30 is "yes," please list which types will be reinspected, and what they will be reinspected for.
32. If the answer to Question No. 30 is "yes," please state whether or not they will also be inspected without first removing existing protective coatings.

33. If the answer to Question No. 30 is "yes," please fully explain your answer to Question No. 32, with particular attention given to the reasons for removing any existing protective coatings prior to inspection, if that is the case.
34. Please provide complete copies of all written comments on, or correspondence about the study and the meeting briefing--both by TUGCO personnel (including their contractors' employees, and/or attorneys) and by NRC personnel (including Region IV, and all other branches of the NRC, their attorneys and/or consultants).
35. Please provide complete copies of any revisions to the study as they are produced (if any).
36. Please provide complete copies of any revisions, deletions, and/or additions to each and every procedure used in this portion of the re-inspection effort.
37. Please provide a complete list of each and every other meeting held between TUGCO and/or CPRT personnel and members of the Region IV NRC Staff on the same or any other topic or issue area being covered as a part of the CPRT effort. Include in your list the following information for each one: the meeting location, the date(s) of the meeting, each and every participant at the meeting, and a complete copy of all records associated with the meeting (see Question No. 2 of this pleading for a list of requested "records".) (Note: If there have been no such other meetings held, please so state.)
38. If there have been any other meetings on CPRT-related issues, areas, etc. held between TUGCO and/or CPRT personnel and members of the Region IV NRC Staff, please also provide the same information on each and every meeting as was requested concerning the July 2, 1985 meeting in Questions Nos. 3, 4, 5, 6 (all sub-parts), and any similar studies, comments, and revisions of same if any were discussed and/or presented during, before, or after any of these meetings (cf. Questions. Nos. 1, 34, 35, and 36 for requested information).
39. Please provide the same information requested in Questions Nos. 37 and 38 for any other meetings held between TUGCO and/or CPRT personnel and members of the NRC's TRT staff and/or consultants on the same or any other topic or issue area being covered as part of the CPRT effort.
40. Please advise CASE in advance of any and all such future meetings. CASE would like to be afforded the opportunity to attend such meetings. Include in your answer whether or not Applicants voluntarily agree for such participation by CASE, as well as the extent of CASE's participation (observer only or active participant) to which Applicants will agree.
41. Provide copies of any and all documents (in the broad sense of the word, as defined on page 2, item 3, of this pleading, and including but not limited to: internal memoranda, informal notes, handwritten notes, etc.) which are discussed at, handed out at, relied upon, etc., regarding such meetings.
Meetings should be construed to include visits such as the one currently planned wherein some members of the NRC Staff will meet at Stone & Webster's New York offices on August 29 and 30, 1985. We want all the information requested in Q. 37-39 on each meeting.

Discovery Re: CPRT:

1. Please provide a complete copy of F.A. Webster's work, Developing Plans for TRT Issues, Civil/Structural/Mechanical CPRT, File No. 11.1-001, 3/12/85. (Cf. Appendix D, "CPRT Sampling Approach, Applications, and Guidelines, CPRT Plan, Rev. 0, page 7 of 11, footnote **.)
2. Please provide a complete copy of D.B. Owen's work, Handbook of Statistical Tables, Addison Wesley, 1962. (Cf. Appendix D, "CPRT Sampling Approach, Applications, and Guidelines, CPRT Plan, Rev. 0, page 7 of 11, footnote *.)
3. Please provide a complete copy of all other documents developed by F.A. Webster, et. al., in the process of developing sampling approaches, applications and/or guidelines for each and every issue area of the CPRT effort.
4. Please provide a complete copy of all other documents relied on by Applicant and/or Applicant's CRPT response teams in developing and/or implementing the sampling approach, applications, and/or guidelines for each and every issue area of the CPRT effort.

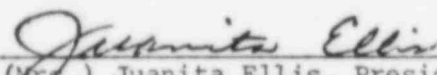
Discovery re: Other:

1. Provide a list of any and all contracts, purchase orders, letters of agreement, etc. (documents as defined on page 2, item 3, of this pleading) between Applicants or any of their employees or agents and Management Analysis Company (MAC). Include in the list the dates of each such document, the general purpose or summary of each such document, and the result of each such document (such as a report being issued, etc.).
2. Provide a copy of each document listed in 1. preceding, as well as any and all other audits, reports, summaries, etc. (documents as defined on page 2, item 3, of this pleading) either to MAC from Applicants or any of their employees or agents, or from MAC to Applicants or any of their employees or agents. (If this information has not already been provided for the original MAC Report already sent to the Board and parties by Applicants, provide this information and documents for that report also.)

Discovery related to Cygna IAP, etc.:

1. Provide the ANCO cable tray test report referenced in Cygna's 3/27/85 letter 84056.061 to John Beck, TUGCO.
2. Provide the concrete expansion anchor test data being collected by EPRI as part of the Seismic Qualification Utility Group (SQUG) equipment qualification program. (As discussed in Cygna's 6/11/85 letter 84056.071 to George Sliter, EPRI.)
3. Provide the documents requested by Cygna in its 8/1/85 letter 84086.078 to John Beck, TUGCO (referring to a 6/27/85 request).
4. What was Applicants' response to Cygna's letter referenced in 3. preceding? Provide a copy of any and all documents (in the broad sense, etc.) regarding your response.
5. Provide the updated copy of Cygna's documents received list for ASLB hearing related submittals (referenced in Cygna's 8/7/85 letter 84042.40 to Jack Redding, TUGCO).
6. Provide CASE with copies of all documents supplied to Cygna in response to Cygna's questions (such as the ones which were attached to Cygna's 8/6/85 letter 84042.39 to CASE) at the time Applicants send them to Cygna.
(This is necessary because of the delay in CASE's receiving documents such as these. The 8/6/85 letter from Cygna attached a 3" thick stack of documents with dates which ranged from September 1984 to June 17, 1985. This long delay in receiving documents is unacceptable to CASE. We believe that the most reasonable way to see that they are provided in a timely fashion is for Applicants to provide them to CASE at the same time they provide them to Cygna.)
Include in your response whether or not Applicants will voluntarily agree to provide CASE with such documents at the same time Applicants provide them to Cygna.

Respectfully submitted,


(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound Energy)
1426 S. Polk
Dallas, Texas 75224
214/946-9446

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	}}	
	}}	
TEXAS UTILITIES ELECTRIC	}}	Docket Nos. 50-445-1
COMPANY, <u>et al.</u>	}}	and 50-446-1
(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 8/27/85 Interrogatories to Applicants and Requests to Produce

have been sent to the names listed below this 27th day of August, 1985,
by: First Class Mail

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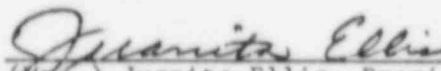
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