

413
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD⁸⁵

DOCKETED
USNRC

DEC -9 A9:19

In the Matter of	:	Docket Nos. 50-445
TEXAS UTILITIES ELECTRIC	:	50-446
COMPANY, ET AL.	:	50-445-2
	:	50-446-2
(Comanche Peak Steam Electric	:	
Station, Units 1 and 2)	:	

**APPLICANTS' SUPPLEMENTAL RESPONSES
TO CASE'S INTERROGATORIES
RE: THE MAC REPORT AND
ISSUES RAISED BY THE MAC REPORT
(THIRD SUPPLEMENT)**

Pursuant to 10 C.F.R. Sections 2.740b and 2.741, Applicants hereby provide their third supplemental responses¹ to CASE's Interrogatories in connection with the MAC Report and Issues Raised by the MAC Report dated June 24, 1985. Applicants' supplemental responses are governed by the Memorandum and Order entitled "Memorandum (Motions Relating to the MAC Report)" dated July 22, 1985, and by the Memorandum and Order entitled "Memorandum (Status of Pending Motions)" dated October 29, 1985.

2. (d) Provide the exact extent of knowledge (attended initial interview regarding MAC Report, attended pre-audit meeting, attended post-audit meeting, received copy of report, knew about report, participated in internal management discussions regarding report, was aware report should have been provided to CASE on discovery, was interviewed by Mr. Wooldridge "in order to determine why the report was not produced in 1980 in response to CASE's first discovery request," etc.) of each of the individuals listed below.

(If the extent of his/her knowledge changed, give specific details as to how, why, in what way, and at what time such change occurred.)

¹ The first supplement by letter of August 22, 1985 from Robert A. Wooldridge to the Licensing Board; second supplement on November 27, 1985, by letter from Robert A. Wooldridge to the Office of the Secretary, U.S. Nuclear Regulatory Commission.

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Engineering personnel: David Wade, Messrs. Finneran, Iotti, Krishnan, Chang, McGrane, Seever, any other engineering personnel (list each)

Anyone else interviewed by Mr. Wooldridge² (list each), "to the extent this would have included Billy R. Clements."

Cygna (list each individual)

ANSWER:

The affidavit of Billy R. Clements, setting forth the extent of his knowledge of matters inquired about in this Interrogatory, was included in "Applicants' Responses to CASE's Interrogatories Re: The MAC Report and Issues Raised by The MAC Report" dated August 12, 1985.

Regarding the extent of knowledge³ of the others mentioned above, see the attached affidavits of Cygna, and Messrs. Wade, Finneran, Iotti, Krishnan, Chang, McGrane, and Siever.

Respectfully submitted,

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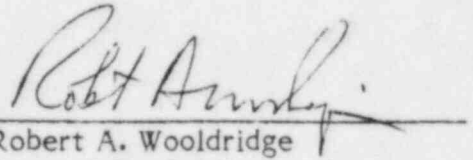
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² As per pages 3 and 7 of CASE's Motion for Reconsideration dated August 5, 1985.

³ Cygna affidavit is by Nancy H. Williams, per telephone agreement with Ms. Ellis.

By

A handwritten signature in cursive script, appearing to read "Robert A. Wooldridge", written over a horizontal line.

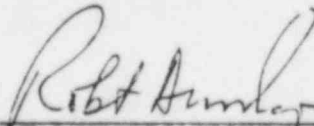
Robert A. Wooldridge
Counsel for Applicants

AFFIDAVIT

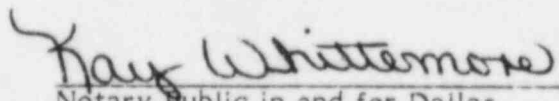
THE STATE OF TEXAS
COUNTY OF DALLAS

:
:
:

Before me, the undersigned authority, a Notary Public in and for Dallas County, Texas, on this day personally appeared ROBERT A. WOOLDRIDGE, who, after being by me first duly sworn, upon his oath stated that he is attorney for Applicants, is authorized to reply to CASE's Interrogatories Re: The MAC Report and Issues Raised by the MAC Report on behalf of the Applicants, and further stated that, to the extent the supplemental responses to these Interrogatories refer to statements made by others, he has relied upon such statements, and that he has no reason to believe that any of the statements are untrue.


ROBERT A. WOOLDRIDGE

SUBSCRIBED AND SWORN TO before me by the said ROBERT A. WOOLDRIDGE on this, the 6TH day of December, 1985.


Notary Public in and for Dallas
County, Texas

My Commission Expires:

7-1-89

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NUCLEAR REGULATORY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Supplemental Responses to CASE's Interrogatories Re: The MAC Report and Issues Raised by the MAC Report (Third Supplement)" in the above captioned matter were served upon the following persons by Federal Express (*) or by Express Mail (**) or by hand delivery (***) on the 6th day of December, 1985.

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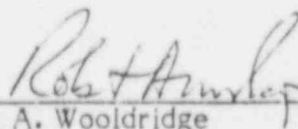
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