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RELATED CORRESPONDENCE

Filed: January 22, 1988
USNRC

UNITED STATES OF AMERICA

'88 JAN 22 P3:28

NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

before the

ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

Docket Nos. 50-445-OL)

50-446-OL)

TEXAS UTILITIES GENERATING)
COMPANY et al.)(Comanche Peak Steam Electric)
Station, Units 1 and 2))(Application for an)
Operating License))

APPLICANTS' SUPPLEMENTATION TO
THEIR ANSWERS TO CASE'S
INTERROGATORIES TO APPLICANTS (AUGUST 27, 1985)

Without waiving their objections heretofore interposed, the Applicants hereby supplement their responses to "CASE's Interrogatories to Applicants (August 27, 1985)" as follows:

Interrogatory No. A-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.

Response:

Updated organization charts are available for review.
Resumes will be obtained and provided if specifically requested.

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Interrogatory No. A-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.

Response:

J. E. Krechting - Director of Technical Interface (TU)

W.R. Deatherage - Director, Engineering Administration (TU)

O. W. Lowe - Director of Engineering (TU)

- J. W. Muffett (TU)
- P. B. Stevens (TU)
- R. D. Calder (TU)
- J. L. Barker (TU)
- R. T. Jenkins (TU)
- C. A. Carter (TU)

T. G. Tyler - Director of Projects (TU)

- C. L. Terry (TU)
- D. W. Stonestreet (TU)
- L. Sluiter (TU)
- D. Hafstienn (TU)

D. M. Reynerson - Director of Construction (TU)

- H. C. Dodd (B&R)
- R. Green (Daniel)
- M. M. Gonzalez (TU)
- H. W. Sorensen (TU)

R. P. Klause - PSE Project Manager (SWEC)

- A. W. Chan (SWEC)
- C. Watters (SWEC)
- C. Fonseca (SWEC)
- D. Hernon (SWEC)
- K. Y. Chu (SWEC)

K. C. Warapius - Site Project Manager (IMPELL)

C. Bradbury (IMPELL)
W. Johnston (IMPELL)
J. H. Wawrzeniak (IMPELL)
B. L. Ramsey (IMPELL)

E. N. Odar - Project Engineering Manager (EBASCO)

B. Leo (EBASCO)
R. Shetty (EBASCO)
R. Baker (EBASCO)
K. Fitzgerald (EBASCO)
M. Strehlow (EBASCO)

R. H. Ackley, Jr. - CAP Project Manager (SWEC)

J. R. Peterson (SWEC)
S. L. Stamm (SWEC)
M. P. Obert (SWEC)
P. Fitzgerald (SWEC)
F. J. Burns (SWEC)
P. Reilly (SWEC)

J. F. Streeter - Director, Quality Assurance (TU)

D. M. McAfee (TU)
P. E. Halstead (TU)
C. H. Welch (TU)
C. T. Brandt (EBASCO)
D. A. Noss (Daniel)
D. E. Deviney (TU)

R. D. Walker - Manager, Nuclear Licensing (TU)

D. R. Woodlan (TU)
J. S. Marshall (TU)

L. E. Powell - Manager, Administration (TU)

S. S. Palmer (TU)
D. L. Anderson (TU)
W. D. Fenoglio (TU)
T. L. Smart (TU)
G. M. Hamilton (TU)
R. G. Spangler (TU)

D. Ferguson - Director, CPRT (Delian)

R. Werner - Manager, SAFETEAM (TU)

F. Green (SYNDECO, Inc.)

T. Gibbs (NIC)

J. C. Kuykendall - Vice President Administration (TU)

J. L. Brackney (TU)

H. J. Cheatham (TU)

Interrogatory No. A-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.

Response:

Updated organization charts are available for review. Resumes will be obtained and provided if specifically requested.

Interrogatory No. H-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).

Response:

The need to supplement these interrogatories has been superseded by the "Agreement Between CASE and Applicants Regarding Discovery Matters Relating to Comanche Peak Nuclear Power Plant" dated August 19, 1986. Item 8 of the "Agreement" provides that "Three copies of all letters, including those responding to specific CYGNA questions, from Applicants to CYGNA will be sent to Mrs. Ellis, at no charge to CASE, at the time they are sent to CYGNA by Applicants"

Documents are currently being provided in accordance with the "Agreement", therefore, no further supplementation will be provided in response to Interrogatory Nos. H-3 and H-6.

Interrogatory No. H-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.

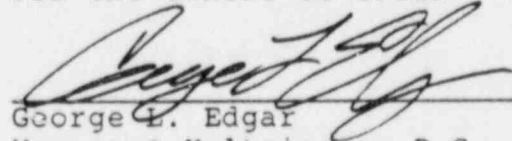
Response:

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Documents are currently being provided in accordance with the "Agreement", therefore, no further supplementation will be provided in response to Interrogatory Nos. H-3 and H-6.

Respectfully submitted,

TEXAS UTILITIES ELECTRIC COMPANY
For the Owners of CPSES



George L. Edgar
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, D.C. 20036
(202) 955-6600

Attorneys for Texas Utilities
Electric Company

Signatures

As to Answers:

I, Debra L. Anderson, being first duly sworn, do depose and say that I am a Project Manager for the Generating Division of Texas Utilities Electric Company, that I have assisted in the preparation of the foregoing answers, and that the foregoing answers are true, except insofar as they are based on information that is available to the Applicants but not within my personal knowledge, as to which I, based on such information, believe them to be true.

Debra L. Anderson

Sworn to before me this
20th day of January, 1988

Olga D. Larres

Notary Public

My Commission Expires: 5-8-91

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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TEXAS UTILITIES GENERATING)	
COMPANY et al.)	
)	(Application for an
(Comanche Peak Steam Electric)	Operating License)
Station, Units 1 and 2))	
)	

CERTIFICATE OF SERVICE

I, Thomas A. Schmutz, hereby certify that the foregoing Applicants' Supplementation To Their Answers To CASE's Interrogatories To Applicants (August 27, 1985) was served this 22nd day of January 1988, by mailing copies thereof (unless otherwise indicated), first class mail, postage prepaid to:

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Thomas A. Schmutz

Dated: January 22, 1988