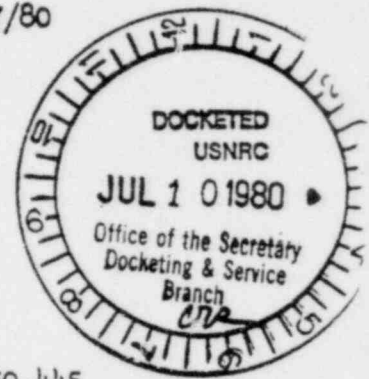


7/7/80

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of

APPLICATION OF TEXAS UTILITIES
GENERATING COMPANY, ET AL. FOR AN
OPERATING LICENSE FOR COMANCHE
PEAK STEAM ELECTRIC STATION
UNITS #1 AND #2 (CPSES)

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Docket Nos. 50-445
and 50-446

CASE FIRST SET OF INTERROGATORIES
TO APPLICANT

Pursuant to 10 CFR § 2.740(b), Intervenor CASE (Citizens Association for Sound Energy) requests that the attached Interrogatories be answered fully, in writing, and under oath by the officers or employees of the Applicants who have personal knowledge thereof or are the closest to having personal knowledge thereof. Provide the name, title, and company affiliation of each person answering Interrogatories, together with an identification of which Interrogatories such person is responsible for answering.

Each Interrogatory has been identified as to which specific accepted Contention it pertains to.

CONTENTION #5

1. Supply copies of each and every Deficiency and Disposition Report (DDR) log.
2. Supply copies of each and every Non-Conformance Report (NCR) log.
3. Supply copies of each and every Field Request for Engineering Action (FREA) log.

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4. Supply copies of each and every Corrective Action Request (CAR) log.
5. Supply copies of each and every Concrete Pour log.
6. For items 1 through 5, supply a signed statement that each and every log requested has been supplied, and that there are and have been no others.
7. For items 1 through 5, supply full-size, rather than reduced, copies of each.
8. How many internal audits have the Applicants performed on Brown and Root?
9. How many audits have been performed by insurers (industrial risk, builder's risk, etc.) on work done at the Comanche Peak plant?
10. How many outside or sub-contractor evaluations, studies or audits have been conducted (by sub-contractors or agents of sub-contractors or by consulting firms or others, etc.)?
11. Regarding items 8 through 10, provide the following information:
 - (a) What was the purpose of the audit, evaluation, or study?
 - (b) What were the conclusions of the audit, evaluation, or study?
 - (c) Who instituted the audit, evaluation, or study?
 - (d) Where is the audit, evaluation, or study kept so that we can review it?
12. Do Brown & Root, Texas Utilities or any of its subsidiaries or companies, or any of the other owners of CPSES have a public relations department

- for the Comanche Peak plant (or if not specifically for the Comanche Peak plant, which provide information regarding the plant)?
13. If the answer to item 12 is yes, itemize the specific companies which have such departments and state the extent of and the type of information supplied by each. (For example, is there a specific public relations department for CPSES? does a particular company provide information as a part of its over-all public relations department's work? do the companies, or a specific company, prepare special public relations materials specifically for the CPSES? If so, what type of information?)
 14. If the answer to item 12 is yes, supply copies of all publications or information by all such departments regarding the quality control, quality assurance, safety, workmanship, and method by which the plant is being built.
 15. Was there another method of documentation prior to use of deficiency and disposition reports (DDR's)?
 16. If the answer to item 15 is yes, what was such method of documentation?
 17. If the answer to item 15 is yes, supply copies of each and every log regarding such method of documentation.
 18. Supply copies of any and all progress reports to the public regarding CPSES, including information provided at the CPSES information center.

19. Supply copies of all quality control manuals, folders, pamphlets, and any other printed information regarding quality control, including procedures for quality control, not only current but the originals and all revisions.
20. Are there any audio tapes or video tapes of any of the information referred to in item 19?
21. If the answer to item 20 is yes, where are such tapes kept so that we can review them?
22. Supply copies of all quality control specifications manuals, folders, pamphlets, and any other printed information regarding quality control specifications, not only current but the originals and all revisions.
23. Supply copies of all manuals, folders, pamphlets, and any other printed information regarding quality assurance, quality assurance specifications, and quality assurance procedures, not only current but the originals and all revisions. If this information has been supplied in response to item 19, so state.
24. Are there any audio tapes or video tapes of any of the information referred to in items 22 and 23?
25. If the answer to item 24 is yes, where are such tapes kept so that we can review them?

26. For items 14, 17, 18,19, 22, and 23, supply full-size, rather than reduced, copies of each.

CONVENTION #25:

27. Has Texas Utilities or any of its subsidiaries or companies signed a letter of intent to negotiate the sale of an interest in CPSSES to Tex-La Electric Cooperative?
28. If the answer to item 27 is yes, supply complete details of such negotiations, including date of such letter of intent, copy of such letter of intent, percentage interest involved, expected date of sale, expected value of percentage to be sold, expected sales price of percentage to be sold, method of payment by buyer to seller, and any other pertinent details.
29. Has Texas Utilities or any of its subsidiaries or companies made overtures to or had discussions with any other party or company to negotiate the sale of an interest in CPSSES?
30. If the answer to item 29 is yes, supply complete details (as outlined in item 28) of such overtures or discussions.

Respectfully submitted,

Juanita Ellis

(Mrs.) Juanita Ellis, President
CASE (CITIZENS ASSOCIATION FOR SOUND ENERGY)
1426 S. Polk
Dallas, TX 75224
214/946-9446

Dated: 7/7/80

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

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UNITS #1 AND #2 (CPSES)

Docket Nos. 50-445
and 50-446

CERTIFICATE OF SERVICE

I hereby certify that copies of CASE's FIRST SET OF INTERROGATORIES TO APPLICANT in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 7th day of July, 1980:

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U. S. Nuclear Regulatory Commission
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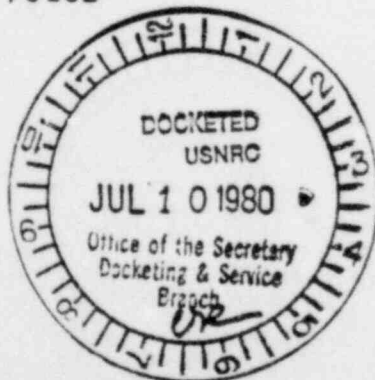
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Atomic Safety and Licensing Board
Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Atomic Safety and Licensing
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Washington, D. C. 20555

Docketing and Service Section
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Juanita Ellis
(Mrs.) Juanita Ellis, President
CASE (CITIZENS ASSOCIATION FOR
SOUND ENERGY)