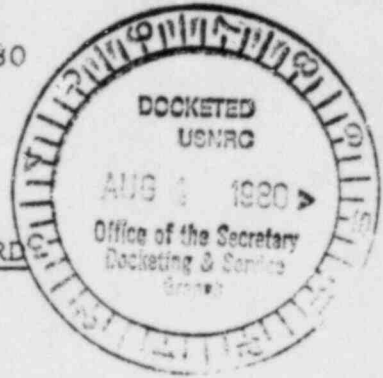


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August 1, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

APPLICANTS' FIRST SET OF INTERROGATORIES
TO CASE AND REQUESTS TO PRODUCE

Pursuant to 10 C.F.R. §§2.740b and 2.741, Texas

Utilities Generating Company, et al. ("Applicants") hereby serve Applicants' First Set of Interrogatories and Requests to Produce upon Citizens Association for Sound Energy ("CASE"). Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to CASE, its officers, directors or members as well as any pertinent information known to its employees, advisors or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of CASE, its officers, directors or members as well as its employees, advisors or counsel. In answering each interrogatory and in responding to each request, please recite the interrogatory or request preceding each answer or response. Also, please identify the person providing each answer or response.

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These interrogatories and requests shall be continuing in nature. Thus, any time CASE obtains information which renders any previous response incorrect or indicates that a response was incorrect when made, CASE should supplement its previous response to the appropriate interrogatory or request to produce. CASE should also supplement its responses as necessary with respect to identification of each person expected to be called at the hearing as an expert witness, the subject matter of his or her testimony, and the substance of that testimony. The term "documents" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. We request that at a date or dates to be agreed upon, CASE make available for inspection and copying, all documents subject to the requests set forth below.

APPLICANTS' INTERROGATORIES AND
REQUESTS TO PRODUCE

Contention 5. The Applicants' failure to adhere to the quality assurance/quality control provisions required by the construction permits for Comanche Peak, Units 1 and 2, and the requirements of Appendix B of 10 C.F.R. Part 50, and the construction practices employed, specifically in regard to concrete work, mortar blocks, steel, fracture toughness testing, expansion joints, placement of the reactor vessel for Unit 1, welding, inspection and testing, materials used, craft labor qualifications and working conditions (as they may affect QA/QC), and training and organization of QA/QC personnel, have raised substantial questions

as to the adequacy of the construction of the facility. As a result, the Commission cannot make the findings required by 10 C.F.R. §50.57(a) necessary for issuance of an operating license for Comanche Peak.

1. Please state in your own words the meaning of Contention 5.
2. What is your basis for Contention 5? Please list all documents not elsewhere identified in these interrogatories on which you rely for your position on Contention 5. Please provide these documents for inspection and copying.
3. Have you prepared, or have you caused to be prepared, any report, study or analysis on which you intend to rely for your position regarding Contention 5? If so, please identify the report, study or analysis and the author thereof, including that person's professional and educational background. Please provide for inspection and copying any such reports, studies or analyses.
4. What are the dates of all meetings or contacts held with the other intervening parties with respect to Contention 5? Please specify the purpose of such meetings or contacts, and the results of such meetings or contacts.
5. Have you met with or contacted any other individual or group with respect to Contention 5? If so, please identify that individual or group and indicate the reason for those meetings or contacts, the dates of those meetings or contacts and the results of those meetings or contacts.
6. Do you intend to file any testimony in the upcoming hearings on Contention 5? If so, who will be the sponsor (i.e., witness) of that testimony? Please specify the nature of such testimony and the professional and educational background of the witness. Please provide copies of that testimony. Please provide for inspection and copying any documents relied upon in that testimony.
7. Do you intend to call any witness in the upcoming hearing with respect to Contention 5? If so, please identify the witness including a summary of his or her professional and educational background. Also, set forth any other information bearing on that person's qualifications to testify with respect to Contention 5.

8. If you plan to call any witness during the upcoming hearing with respect to Contention 5, please specify the nature and scope of his or her testimony. Please list or identify any documents which that witness intends to rely on in giving their testimony. Also please state whether that witness has conducted any research or made any studies which such witness intends to rely upon. Please provide copies of such testimony. Also, please provide for inspection and copying any documents relied on in such testimony.
9. Have you read the construction permits for Comanche Peak, Units 1 and 2? If not, why not? If so, please answer the following:
 - a. Which "provisions" do you contend the Applicants have not satisfied?
 - b. In what way do you contend the Applicants have not satisfied those provisions?
 - c. What are your bases (legal and/or other) for your responses to a. and b.?
10. What do you mean by "Applicants' failure to adhere"?
11. What do you contend Applicants' must do to satisfy those provisions of the construction permits identified in Interrogatory 9a. above?
12. What is your basis (legal and/or other) for your answer to Interrogatory 11?
13. Have you reviewed 10 C.F.R. Part 50, Appendix B? If not, why not? If so, please answer the following:
 - a. Which provisions of 10 C.F.R. Part 50, Appendix B do you contend Applicants have not satisfied?
 - b. In what way do you contend the Applicants have not satisfied those provisions?
 - c. What are your bases (legal and/or other) for your responses to a. and b.?
14. What do you contend the Applicants must do to satisfy the provisions of 10 C.F.R. Part 50, Appendix B?
15. What is your basis (legal and/or other) for your answer to Interrogatory 14?

16. Which of the specific "construction practices employed" listed in Contention 5 do you intend to challenge with respect to Comanche Peak?
17. With respect to each of those construction practices you intend to challenge, specify how you believe Applicants have not met applicable NRC requirements. What is your basis (legal and/or other) for your response to this interrogatory?
18. Specify those NRC requirements you contend the construction practices employed do not meet. What is your basis (legal and/or other) for your response to this interrogatory?
19. What do you believe Applicants must do to satisfy each of the NRC requirements applicable to the specific construction practices identified in your response to Interrogatory 16. What is your basis (legal and/or other) for your response to this interrogatory?
20. Do you intend to challenge the adequacy of Applicants' "training and organization of QA/QC personnel"?
21. If your answer to Interrogatory 20 is in the affirmative, please specify those aspects of Applicants' training and organization of QA/QC personnel which you intend to challenge.
22. If your answer to Interrogatory 20 is in the affirmative, please specify the NRC requirements which you contend Applicants have not satisfied with respect to the training and organization of QA/QC personnel. What is your basis (legal and/or other) for your response to this interrogatory?
23. What do you believe the Applicants must do to satisfy those requirements set forth by you in your response to Interrogatory 82?
24. What is your basis (legal and/or other) for your response to Interrogatory 23?
25. Please state in your own words what the term "substantial questions" means in Contention 5.
26. Please indicate in your own words what the term "adequacy" means in Contention 5.
27. Which findings required by 10 C.F.R. §50.57(a) do you contend cannot be made with respect to Comanche Peak?

28. What is your basis (legal and/or other) for your response to Interrogatory 27?
29. Please state with specificity what you contend Applicants must do which they have not already done to permit the findings identified in your response to Interrogatory 27 to be made?

Contention 23. Neither the Applicants nor the Staff has adequately considered the health effects of low-level radiation on the population surrounding CPSES in as much that the CPSES design does not assure that radioactive emissions will be as low as is reasonably achievable.

30. Please state in your own words the meaning of Contention 23.
31. What is your basis for Contention 23? Please list all documents not elsewhere identified on which you rely with respect to Contention 23. Please provide copies of all such documents for inspection and copying.
32. Have you prepared any report, study or analysis in connection with Contention 23? If so, please identify by subject and author, including the author's professional and educational background. Please provide for inspection and copying any such report, study or analysis on which you intend to rely.
33. Have you caused others to prepare any report, study or analysis in connection with Contention 23? If so, please identify each such report, study or analysis by subject and author, including the professional and educational background of the author. Please provide for inspection and copying each such report, study or analysis on which you intend to rely.
34. What are the dates of the meetings or contacts you have had with the other intervening parties with respect to Contention 23? Please specify the purpose of such meetings or contacts, and the results of such meetings or contacts.
35. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 23? Please identify the reasons for those meetings or contacts, the other persons involved, and the results of such meetings or contacts.

36. Do you plan to participate in the upcoming hearing on Contention 23? If so, what will be the extent of your participation?
37. Do you plan to file testimony in the upcoming hearing with respect to Contention 23? If so, who will be the sponsor (i.e., witness) of that testimony? Please specify the nature of such testimony and the professional and educational background of the witness. Please provide copies of that testimony. Also, please identify and provide for inspection and copying any documents relied on in that testimony.
38. Do you plan to call any witnesses in the upcoming hearing with respect to Contention 23? If so, please provide a summary of his or her professional and educational background. Also, set forth any information which has a bearing on his or her qualifications to testify in this proceeding on Contention 23.
39. If you plan to call any witness in the upcoming hearing with respect to Contention 23, please specify the nature and scope of his or her testimony. Please provide copies of such testimony. Also, please identify by title, subject matter and author, and provide for inspection and copying, any documents which that witness will rely upon in their testimony with regard to Contention 23.
40. Have you reviewed the Applicants' Final Safety Analysis Report (FSAR)? If not, why not? If so, please answer the following questions:
 - a. Do you object to any of the information, data or analysis contained or referenced therein with respect to the consideration of the health effects of low-level radiation?
 - b. If your answer to a. is in the affirmative, please specify those objections by identifying the sections of the FSAR to which you object and the substance of your objections.
 - c. Please identify those measures which you believe Applicants must take to satisfy applicable NRC regulations regarding the health effects of low-level radiation.
 - d. What are your bases (legal and/or other) for your responses to a., b., and c.?

41. Have you reviewed the Applicants' Environmental Report-Operating License Stage ("ER-OL")? If not, please explain. If so, please answer the following questions.
 - a. Do you object to any of the information contained therein with respect to the consideration of low-level radiation?
 - b. If your answer to a. is in the affirmative, please specify those objections by identifying the sections of the ER-OL to which you object and the substance of your objections.
 - c. What are your bases (legal and/or other) for your responses to a. and b.?
42. Do you contend that even if Applicants comply with the as low as is reasonably achievable (ALARA) standard the Applicants do not satisfy NRC regulations with respect to giving consideration to the health effects of low-level radiation?
43. If your answer to Interrogatory 42 is in the affirmative, please identify the applicable NRC requirements which you believe Applicants have not satisfied with respect to consideration of the health effects of low-level radiation. What is your basis (legal and/or other) for this position?
44. If your answer to Interrogatory 42 is in the negative, please specify your objections to the Applicants' treatment of low-level radiation with respect to the ALARA standard. What do you believe the Applicants must do to satisfy the ALARA requirement? What is your basis (legal and/or other) for this position?
45. What aspects of the Comanche Peak design do you believe do not assure that radioactive emissions will be as low as is reasonably achievable? Please identify those aspects with specificity. What is your basis (legal and/or other) for this position?
46. What do you believe Applicants must do with respect to those design features identified in your response to Interrogatory 45 to bring the Comanche Peak design into compliance with the ALARA standard? What is your basis (legal and/or other) for this position?

47. What do you contend Applicants must do that they have not already done to demonstrate that the Comanche Peak design meets the ALARA standard? Specifically, what are the health effects which you believe Applicants have not adequately considered? Please identify those health effects with specificity. What is your basis (legal and/or other) for this position?
48. What is your basis (legal and/or other) for your answer to Interrogatory 47? Please identify any documents on which you rely. In identifying those documents please specify the title, the subject matter and the author (including his or her professional and educational background). Please provide copies of those documents for inspection and copying.
49. What kinds of radiation do you believe Applicants have not adequately addressed with respect to the health effects thereof?
50. What is your basis for your position with respect to Interrogatory 49? Please identify any documents on which you rely for your answer to Interrogatory 48. Please identify those documents by title, subject, and author (including his or her educational and professional background). Please provide copies of those documents for inspection and copying.
51. What are the sources of the radiation identified in Interrogatory 49? Please specify as to system and/or process, including equipment involved, which you contend provides the pathway for release of this radiation.
52. What radiation levels do you contend will be caused by the operation of Comanche Peak? Please specify where you contend such levels will occur and the conditions (e.g., operational, meteorological, etc.) which you contend will be associated with such levels.
53. What exposures do you contend will be caused by the radiation levels identified in your answer to Interrogatory 52? Please identify those exposures by population affected as well as specific exposure pathways.
54. With respect to your answers to Interrogatories 51 to 53, please identify the bases for your answers. Please identify any reports, studies or analyses on which you rely for those answers by subject, title and author (including his or her professional and educational background). Please provide copies of those documents for inspection and copying.

Contention 24. A favorable cost/benefit balance cannot be made because Applicant has failed to adequately consider:

- a. The costs of safely decommissioning the facility after its useful life.
 - b. The costs in terms of health, as well as the economic costs of a possible accident in the on-site storage of spent fuel.
 - c. The fuel costs and supply.
 - d. The costs of waste storage.
55. What kind of "costs" do you believe should be considered in the cost/benefit balance for Comanche Peak?
 56. What is your basis (legal and/or other) for your answer to Interrogatory 55?
 57. What are the "benefits" which you believe should be attributed to the Comanche Peak facility in making the cost/benefit analysis?
 58. What is your basis (legal and/or other) for your answer to Interrogatory 57?
 59. Do you contend a methodology other than is currently used should be employed in making the cost/benefit balance for the Comanche Peak facility?
 60. What is your basis (legal and/or other) for your response to Interrogatory 59?
 61. What are the criteria which you propose be used to determine whether the cost/benefit balance for Comanche Peak is favorable for licensing Comanche Peak?
 62. List these criteria in order of importance in making a cost/benefit balance.
 63. What is your basis (legal and/or other) for your answer to Interrogatories 61 and 62?
 64. What standard do you contend should be applied to the cost/ benefit balance for Comanche Peak to determine whether that balance is favorable for licensing the facility?
 65. What is your basis (legal and/or other) for your response to Interrogatory 64?

Contention 24a:

66. Please explain the meaning of Contention 24a in your own words.
67. What is your basis for Contention 24a? Please identify all documents relied on with respect to Contention 24a that are not elsewhere identified in your responses to these interrogatories. Please provide copies of those documents for inspection and copying.
68. Have you prepared any report, study or analysis with respect to Contention 24a? If so, please specify the nature of that report, study or analysis and identify any documents on which you relied in its preparation. Please provide for inspection and copying any such report, study or analysis as well as any documents^e relied on in preparation thereof.
69. Have you caused to be prepared any report, study or analysis with respect to Contention 24a? If so, please identify each such report, study or analysis by subject and author, including the author's professional and educational background. Please provide for inspection and copying each such report, study or analysis, as well as any documents relied on in preparation thereof.
70. Have you met with or contacted any intervening party or any other person with respect to Contention 24a? If so, please give the dates of any such meetings or contacts. Also, please specify the persons involved, the purpose and the results of those meetings or contacts.
71. Do you intend to participate in the upcoming hearings with respect to Contention 24a?
72. If your answer to Interrogatory 71 is in the affirmative, please specify the nature of your intended participation in the upcoming hearings with respect to Contention 24a.
73. Do you intend to file written testimony in the upcoming hearings with respect to Contention 24a? If so, please identify the sponsor (i.e., witness) of that testimony and provide a summary of that person's professional and educational background. Please provide copies of such written testimony. Also, please identify and provide copies for inspection and copying any documents which such witness intends to rely on in their testimony.

74. Do you plan to call any witnesses in the upcoming hearing to testify with respect to Contention 24a? If so, please provide a summary of his or her professional and educational background. Also, set forth any other information which has a bearing on his or her qualifications to testify in this proceeding on Contention 24a?
75. If you plan to call any witness in the upcoming hearing on Contention 24a, please specify the nature and scope of his or her testimony. Please provide copies of such testimony. Also, please list by author, title and subject matter, and provide for inspection and copying, documents which any such witness will rely on in their testimony with regard to Contention 24a.
76. What "costs" do you contend have not been adequately considered with respect to decommissioning in the Comanche Peak cost/benefit analysis?
77. What is your basis (legal and/or other) for your answer to Interrogatory 76?
78. What is your basis (legal and/or other) for contending that such costs need be considered in the Comanche Peak cost/benefit balance?
79. Have you performed or caused to be performed a cost/benefit analysis for Comanche Peak using the costs identified above with respect to Contention 24a?
80. If your response to Interrogatory 79 is in the affirmative, please supply such analysis for inspection and copying.
81. Do you contend that the cost/benefit analysis for Comanche Peak would not favor operation of the facility even if the costs identified in your response to Interrogatory 76 were considered? If so, please explain and provide the basis for your answer.
82. Have you reviewed the Applicants' Environmental Report-Operating License Stage ("ER-OL") with respect to the discussion of decommissioning? If not, why not? If so, please answer the following questions:
 - a. Do you object to any of the information, data or analysis contained or referenced therein with respect to the consideration of decommissioning in the cost/benefit balance ?

- b. If your answer to a. is in the affirmative, please specify those objections by identifying the sections in the ER-OL to which you object and the substance of your objections.
 - c. What are your bases (legal and/or other) for your objections identified in b.?
 - d. If your answer to a. is in the affirmative, please identify with specificity the information, data and/or analysis which you contend Applicants must consider with respect to decommissioning to satisfy your objections in Contention 24a.
 - e. What is your basis (legal and/or other) for your response to d.?
83. What do you contend Applicants must do to demonstrate that the cost/benefit balance for Comanche Peak has adequately considered the "costs" of decommissioning?
84. What is your basis (legal and/or other) for your response to Interrogatory 83?
85. What do you contend Applicants must do to demonstrate that the cost/benefit balance for Comanche Peak favors operation of the facility once the considerations you contend must be made with respect to decommissioning have been incorporated in the cost/benefit balance?
86. What is your basis for your response to Interrogatory 85?
87. What do you mean by the term "safely" in Contention 24a?
88. What is your basis (legal and/or other) for your response to Interrogatory 87?
89. Do you contend that any particular mode of decommissioning must be evaluated in the Comanche Peak cost/benefit analysis?
90. If your answer to Interrogatory 89 is in the affirmative, what is your basis (legal and/or other) for contending that such evaluation must be done in the cost/benefit analysis for Comanche Peak?

91. Do you contend that any particular structures, facilities or equipment must be the subject of the decommissioning analysis for the cost/benefit analysis at Comanche Peak? If so, please specify those structures, facilities or equipment.
92. What is your basis (legal and/or other) for your response to Interrogatory 91?
93. Do you contend that the timing of performing decommissioning after the useful life of Comanche Peak will affect the cost/benefit analysis? If so, please specify how you believe the timing of decommissioning would affect the cost/benefit analysis.
94. What is your basis (legal and/or other) for your response to Interrogatory 93?
95. What is the dollar cost of decommissioning which you contend should be considered in the cost/benefit analysis? Please specify how you arrived at this cost figure?
96. How do you contend this dollar cost should be factored into the cost/benefit analysis?
97. What are your bases (legal and/or other) for your responses to Interrogatories 95 and 96?

Contention 24b:

98. Please state the meaning of Contention 24b in your own words.
99. What is your basis for Contention 24b? Please identify those documents on which you plan to rely with respect to Contention 24b that are not otherwise identified in your response to these interrogatories. Please provide copies of those documents for inspection and copying.
100. Have you prepared any report study or analysis with respect to contention 24b? If so, identify those reports, studies or analyses by title and subject matter, and identify any document relied on in preparation thereof. Please provide for inspection and copying any such reports, studies or analyses, and supporting documents, on which you plan to rely with respect to Contention 24b.

101. Have you caused to be prepared any report, study or analysis with respect to Contention 24b? If so, please identify such report, study or analysis and the author thereof (including his or her educational and professional background). Please provide copies of such reports, studies, or analyses, including any documents relied on in preparation thereof, on which you plan to rely with respect to Contention 24b for inspection and copying.
102. Have you met with or contacted any party to this proceeding or any other person with respect to Contention 24b? If so, please provide the dates of any such meetings or contacts, the purpose of the meetings or contacts, and the results thereof.
103. Do you plan to participate in the upcoming hearings with respect to Contention 24b?
104. If your response to Interrogatory 103 is in the affirmative, please specify the nature and scope of your intended participation.
105. Do you intend to file written testimony with respect to Contention 24b in this proceeding? If so, please identify the subject matter and the sponsor (i.e., witness) of such testimony and give the professional and educational background of that witness. Also, please identify and provide for inspection and copying any documents which such witness intends to rely on in their testimony. Please provide copies of that written testimony.
106. Do you plan to call any witnesses in the upcoming hearing to testify with respect to Contention 24b? If so, please provide his or her professional or educational background. Also, set forth any information which has a bearing on his or her qualifications to testify in this proceeding on Contention 24b.
107. If you plan to call any witness in the upcoming hearing with respect to Contention 24b, please specify the nature and scope of his or her testimony, Please provide copies of that testimony. Also, please list and provide for inspection and copying any documents which any such witness will rely upon in their testimony with regard to Contention 24b.

108. What "costs" do you contend have not been adequately considered in the cost/benefit balance for Comanche Peak with respect to Contention 24b?
109. What is your basis (legal and/or other) for your response to Interrogatory 108?
110. What is the basis (legal and/or other) for contending that the costs identified in Interrogatory 108 must be considered in the cost/benefit balance for Comanche Peak?
111. Have you prepared or have you caused to be prepared a cost/benefit balance for Comanche Peak utilizing the costs which you contend should be considered with respect to Contention 24b?
112. If your response to Interrogatory 111 is in the affirmative, please supply a copy of that analysis for inspection and copying.
113. Do you contend that the cost/benefit balance for Comanche Peak would not favor operation of the facility even if the "costs" identified by you in our response to Interrogatory 110 are included in the cost/benefit balance for Comanche Peak. If so, please explain and provide the basis (legal and/or other) for your response.
114. Have you reviewed the Applicants' ER-OL? If not, please explain. If so, please answer the following:
 - a. Do you object to any of the information, data or analysis contained in the ER-OL with respect to possible accidents involving the onsite storage of spent fuel?
 - b. If your answer to a. is in the affirmative, please specify those sections of the ER-OL to which you object and state the substance of your objections.
 - c. What is your basis (legal and/or other) for your response to a. and b.?
 - d. Please specify what information, data and/or analysis you contend must be included in the ER-OL to satisfy your objections under Contention 24b.
 - e. What is your basis (legal and/or other) for your response to d.?

115. What do you contend Applicants must do to demonstrate that the cost/benefit analysis for Comanche Peak has adequately considered the "costs" of possible accidents in the onsite storage of spent fuel?
116. What is your basis (legal and/or other) for your response to Interrogatory 115?
117. What do you contend Applicants must do to demonstrate that the cost/benefit balance for Comanche Peak favors operation of the facility if the "costs" of possible accidents in the onsite storage of spent fuel are adequately considered as you contend?
118. What is your basis (legal and/or other) for your response to Interrogatory 117?
119. What kind of "accident" do you contend might happen with regard to the onsite storage of spent fuel?
120. Which of the "accidents" identified in your response to Interrogatory 119 do you contend has not been adequately considered in the cost/benefit balance for Comanche Peak?
121. Where do you contend that such accidents could happen? Please specify as to the precise location within the Comanche Peak facility.
122. What is the specific sequence of events which you postulate would lead to the type of accident you contend might happen with regard to the onsite storage of spent fuel?
123. Do you contend that the accidents with which you are concerned would occur during the movement of spent fuel? If so, please specify.
124. Do you contend that the accidents with which you are concerned would occur during the storage of spent fuel? If so, please specify.
125. Do you contend that such accidents would occur at any particular time after the discharge of spent fuel from the reactor core? If so, please specify.
126. Do you contend that such accidents would be caused by mechanical failure? If so, please specify.
127. Do you contend that such accidents would occur because of material failure? If so, please specify.

128. Do you contend that such accidents would occur because of human error? If so, please specify.
129. What is the probability of occurrence of the accidents which you contend must be considered?
130. For Interrogatories 120 through 129, please identify the basis for your response and set forth with particularity the analysis which you have performed with respect to those interrogatories. Also, please provide for inspection and copying any documents on which you rely for your response to Interrogatories 120 through 129.
131. What are the consequences of the accidents with regard to the onsite storage of spent fuel which you contend must be considered?
132. Do you contend that any consequences with respect to such accidents are other than radiological in nature? If so, please specify.
133. What are the radioactive nuclides which you contend would be released by such an accident?
134. What is the total activity released to the environment by the accidents which you contend should be considered? Specify in Curies.
135. What are the radioactive doses which you contend would be caused by such accidents? Please specify in terms of maximum exposure to an individual (specify in rems) and total exposure to the population (specify in man-rems).
136. What is the population which you contend would receive the doses identified in your response to Interrogatory 135?
137. What is the decay time prior to the accident for each radioactive nuclide which you contend would be released in the environment in the accident which you postulate should be considered.
138. With respect to Interrogatories 131 through 137, please specify the bases for your responses.
139. Please identify any analyses, including the assumptions and conclusions thereof, with respect to your response to Interrogatories 131 through 137. Please supply any copies of those analyses for inspection and copying.

Contention 24c:

140. Please state the meaning of Contention 24c in your own words.
141. What is your basis for Contention 24c? Please specify any documents on which you rely with respect to your position on Contention 24c that are not otherwise specifically requested. Please provide copies of those documents for inspection and copying.
142. Have you prepared any report, study or analysis with respect to Contention 24c? If so, please identify those reports, studies or analyses and provide copies thereof for inspection and copying. Also, please provide for inspection and copying any document relied on in preparing such reports, studies or analyses.
143. Have you caused to be prepared any report, study or analysis with respect to Contention 24c? If so, please identify those reports, studies or analyses. Also, identify the author thereof and provide his or her professional and educational background. Please provide copies of those reports, studies or analyses, as well as any documents relied on in preparation thereof, for inspection and copying.
144. Have you met with or contacted any other party in this proceeding, or any other person, with respect to Contention 24c? If so, please provide the dates of those meetings or contacts, and the purpose and results thereof.
145. Do you intend to participate in the upcoming hearings with respect to Contention 24c?
146. If your response to Interrogatory 145 is in the affirmative, please specify the nature of your intended participation.
147. Do you intend to submit any written testimony in this proceeding with respect to Contention 24c? If so, please identify the sponsor (i.e., witness) thereof and provide a summary of the educational and professional background of that witness. Please provide copies of that testimony. Also, please identify and provide for inspection and copying any documents which that witness intends to rely on in their testimony.

148. Do you plan to call any witnesses at the hearing to testify with respect to Contention 24c? If so, please identify that witness and provide a detailed summary of his or her educational and professional background. Also, please provide any other information which has a bearing on his or her qualifications to testify with respect to Contention 24c?
149. With respect to any witnesses identified in your response to Interrogatory 148, please set forth the nature of his or her testimony and provide copies thereof. Also, please list by author, title and subject matter, and provide for inspection and copying any documents which any such witness will rely on in their testimony with regard to Contention 24c.
150. Please identify with particularity the "costs" which you contend have not been adequately considered in the cost/benefit analysis for Comanche Peak with respect to fuel and its supply.
151. What is your basis (legal and/or other) for your response to Interrogatory 150?
152. What is your basis (legal and/or other) for contending that the "costs" identified in your response to Interrogatory 150 need be considered in the cost/benefit analysis for Comanche Peak?
153. Have you performed or have you caused to be performed an analysis of the costs and benefits of the Comanche Peak facility using the "costs" which you contend should be considered with respect to fuel and its supply? If so, please provide that analysis for inspection and copying.
154. Do you contend that the cost/benefit balance for Comanche Peak would not favor operation of the facility even if the costs you contend should be considered with respect to fuel and its supply are included in the cost/benefit analysis. If so, please explain and provide the basis for your response.
155. Have you reviewed the Applicants ER-OL? If not, please explain. If so, please answer the following:
 - a. Do you object to any of the data, analysis or conclusions with respect to fuel cost set forth in the ER-OL?

- b. If your answer to a. is in the affirmative, please identify with particularity those sections of the ER-OL to which you object and identify with particularity your objections to specific data, analysis or conclusions.
 - c. What is the basis (legal and/or other) for your response to a. and b. above?
 - d. If you answer to a. is in the affirmative, please identify the information, data or analysis which you contend Applicants must consider in the cost/benefit analysis for Comanche Peak to with respect to satisfy your concerns with regard to fuel costs and supply in Contention 24c.
 - e. What is your basis (legal and/or other) for your response to d.?
156. Please set forth with particularity what you contend the Applicants must do to demonstrate that the cost/benefit analysis for Comanche Peak has adequately considered the costs of fuel and fuel supply,
157. What is your basis (legal and/or other) for your response to Interrogatory 156?
158. Please set forth with particularity what you contend Applicants must do to demonstrate that the cost/benefit analysis for Comanche Peak favors operation of the facility even if the costs you contend in Contention 24d must be considered are so considered.
159. What is your basis (legal and/or other) for your response to Interrogatory 158?
160. Do you contend that Applicants must have contracts for fuel over the life of the plant before receiving an operating license? Please set forth your position with particularity.
161. Do you contend that Applicants must have available a supply of fuel at a predetermined cost before receiving an operating license for Comanche Peak?
162. Do you contend that uranium supplies adequate to supply fuel for all operating reactors in the United States must have been discovered before Comanche Peak can receive an operating license?

163. If your response to Interrogatory 162 is in the negative, do you contend that any particular amount of uranium need be discovered before Comanche Peak can receive its operating license? Please specify with particularity your position with respect to whether any particular amount of uranium need be discovered before an operating license can be issued for Comanche Peak.
164. Do you contend any other costs besides the direct dollar cost of fuel need be considered in the cost/benefit balance for Comanche Peak? If so, please specify.
165. If your response to any of Interrogatories 160 through 164 is in the affirmative, please specify the substance of your contentions and the basis (legal and/or other) therefor.
166. If your response to Interrogatory 161 was in the negative, please specify whether, and if so, how, you contend Applicants should estimate the cost of fuel over the life of the plant for use in the cost/benefit analysis.
167. If your responses to any of Interrogatories 162 and 163 were in the negative, how do you contend that Applicants are to consider fuel supply in the cost/benefit analysis?
168. Please specify your basis (legal and/or other) for your responses to Interrogatories 168 and 169.
169. Do you believe that there must be any particular kind of commitment (other than a contract) for fuel for Comanche Peak at specified prices before issuance of the operating license?
170. What is your basis (legal and/or other) for your response to Interrogatory 169?

Contention 24d:

171. Please set forth in your own words the meaning of Contention 24d.
172. Please identify your basis (legal and/or other) for Contention 24d and provide for inspection and copying any documents on which you rely with regard to Contention 24d which are not otherwise specifically requested.

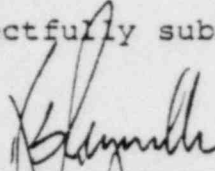
173. Have you prepared any report, study or analysis on which you intend to rely with regard to Contention 24d? If so, please identify such report, study or analysis and provide copies thereof for inspection and copying.
174. Have you caused to be prepared any report, study or analysis on which you intend to rely with regard to Contention 24d? If so, please identify that report, study or analysis and the author thereof (including his or her educational and professional background). Please provide copies of such reports, studies or analyses, and any documents relied on therein, for inspection and copying.
175. Have you had any meetings or contacts with other parties to this proceeding or any other person with respect to Contention 24d? If so, please specify the dates of those meetings and/or contacts, their purpose and the results thereof.
176. Do you intend to participate in the upcoming hearings with respect to Contention 24d?
177. If your answer to Interrogatory 176 is in the affirmative, please specify the nature of your intended participation.
178. Do you intend to submit any written testimony in the upcoming hearings on Contention 24d? If so, please identify the sponsor (i.e., witness) thereof, including his or her educational and professional background. Please provide copies of such written testimony. Also, please identify and provide for inspection and copying any documents on which such witness intends to rely in their testimony.
179. Do you plan to call any witness to testify at the upcoming hearing with respect to Contention 24d? If so, please identify that witness and provide his or her educational and professional background. Also, please provide any other information with respect to that person's qualifications to testify with respect to Contention 24d.
180. If your answer to Interrogatory 179 is in the affirmative, please specify the nature of the testimony to be given. Please provide copies of that testimony. Also, please identify and provide copies of any documents which such witness intends to rely on in their testimony.

181. Please identify with specificity the "costs" which you believe have not been adequately considered in the cost/benefit balance for Comanche Peak with respect to waste storage.
182. What is your basis (legal and/or other) for contending that those "costs" must be considered in the cost/benefit analysis with respect to Comanche Peak?
183. Have you prepared or have you caused to be prepared a cost/benefit analysis for the Comanche Peak facility utilizing the "costs" which you contend must be considered with respect to waste storage?
184. If your response to Interrogatory 183 is in the affirmative, please supply a copy of that analysis, and any documents on which you relied in performing that analysis, for inspection and copying.
185. Do you contend that the cost/benefit analysis for Comanche Peak would not favor operation of the facility even if the costs identified by you with respect to waste storage are considered therein. If so, please explain and provide the basis (legal and/or other) for your answer.
186. Have you reviewed the Applicants ER-OL? If not, please explain. If yes, please answer the following:
 - a. Do you object to any of the data, analysis or conclusions in the ER-OL with respect to considering the cost of waste storage in the cost/benefit balance for Comanche Peak?
 - b. If your answer to a. is in the affirmative, please identify with particularity the section to which you object and the substance of your objection.
 - c. What is your basis (legal and/or other) for your response to a. and b. above?
 - d. Please specify what information, data and/or analysis you believe must be included in the ER-OL with respect to waste storage to satisfy your objections under Contention 24d.
 - e. What is your basis (legal and/or other) for your response to d.?

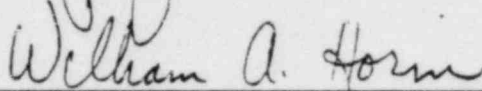
187. What do you contend Applicants must do to demonstrate they have considered the "costs" with regard to waste storage which you contend must be considered in the cost/benefit analysis for Comanche Peak?
188. What is your basis (legal and/or other) for your response to Interrogatory 187?
189. What do you contend the Applicants must do to demonstrate that the cost/benefit analysis favors operation of the Comanche Peak facility if the costs of waste storage which you contend must be considered are included in the cost/benefit analysis.
190. What is your basis (legal and/or other) for your response to Interrogatory 189?
191. What "waste" do you contend the "costs" of which must be considered in the Comanche Peak cost/benefit balance?
192. Do you contend storage of the waste identified in your response to Interrogatory 191 at a location other than on-site has not been adequately considered in the cost/benefit balance for Comanche Peak?
193. Do you contend the cost of waste storage beyond the operating license of the plant must be considered in the cost/benefit balance?
194. What is your basis (legal and/or other) for your responses to Interrogatories 189 through 193?
195. For each kind of waste identified in your response to Interrogatory 191, please identify with specificity the method of storage of those wastes with which you are concerned.
196. What are the "costs" with respect to each type of storage identified in Interrogatory 195 which you contend have not been adequately considered in the cost/benefit analysis?
197. Do you contend that "costs" other than those specifically attributable to storage of wastes at the Comanche Peak facility have not been adequately considered in the cost/benefit analysis for Comanche Peak?

198. Please provide the basis (legal and/or other) for your responses to Interrogatories 195 through 197.

Respectfully submitted,



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August 1, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
TEXAS UTILITIES GENERATING) Docket Nos. 50-445
COMPANY, et al.) 50-446
)
(Comanche Peak Steam Electric) (Application for
Station, Units 1 and 2)) Operating License)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' First Set Of Interrogatories To CASE And Requests To Produce," in the captioned matter were served upon the following persons by deposit in the United States mail, first class postage prepaid this 1st day of August, 1980:

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