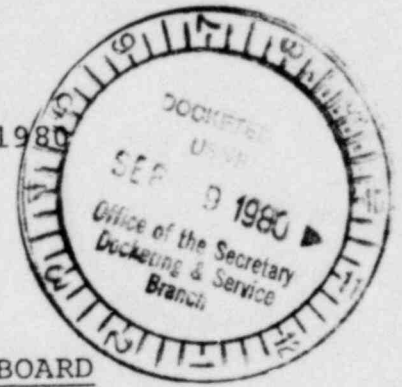


September 8, 1980



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' RESPONSE TO CASE'S  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
AS CLARIFIED BY CASE

Pursuant to 10 C.F.R §2.741(d), Texas Utilities Generating Company, et al., ("Applicants") hereby submit Applicants' Response to "CASE's First Set of Interrogatories to Applicant," dated July 7, 1980, with respect to those requests to produce as to which Applicants sought clarification in their "Answers to CASE's Interrogatories," dated July 28, 1980. CASE clarified those requests in its "Response to and Motion Regarding Applicants' Answers," dated August 4, 1980. The procedures for inspection and copying of the documents requested by CASE are set forth in "Applicants' Response to CASE's Requests for Production of Documents," dated August 11, 1980 and are set forth again below.

Applicants' Responses To Requests To Produce

Each request to produce is identified by item number, corresponding to the numbers in "CASE's First Set of Interrogatories to Applicants," dated July 7, 1980.

Contention 5

Question:

3. Supply copies of each and every Field Request for Engineering Action (FREA) log.
5. Supply copies of each and every Concrete Pour log.
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:
  - (d) Where is the audit, evaluation, or study kept so that we can review it?  
[Regarding Items 9 and 10]

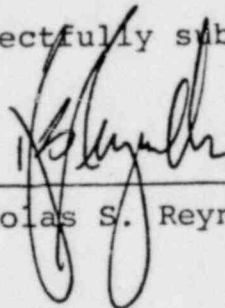
Answer:

Applicants will produce for inspection and copying the documents within the scope of the above requests for production of documents, as clarified by CASE, according

to the following procedures:

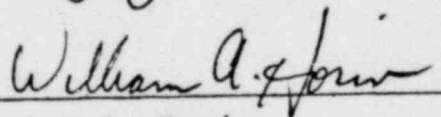
1. The documents identified above will be provided for inspection at the Texas Utilities Generating Company offices, 18th Floor, 2001 Bryan Tower, Dallas, Texas, during normal business hours (8 a.m. - 5 p.m., Monday - Friday).
2. CASE should schedule inspection of documents by notifying Homer C. Schmidt, at (214) 653-4782, who will arrange for documents to be inspected.
3. CASE should not remove any documents from the room provided for such inspection. CASE should identify those documents it wishes to be copied and Applicants will make and supply copies at CASE's expense and at a rate of 15 cents per page.

Respectfully submitted,



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Nicholas S. Reynolds



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William A. Horin

Debevoise & Liberman  
1200 Seventeenth Street, N.W.  
Suite 700  
Washington, D.C. 20036  
(202) 857-9817

Counsel for Applicants

September 8, 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)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Response to CASE's Requests for Production of Documents as Clarified by CASE", in the above captioned matter were served upon the following persons by deposit in the United States mail, first class postage prepaid this 8th day of September, 1980:

Valentine B. Deale, Esq.  
Chairman, Atomic Safety and  
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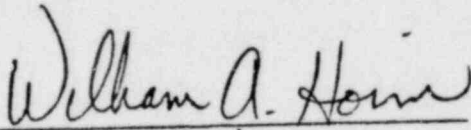
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Mr. Chase R. Stephens  
Docketing & Service Branch  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

  
William A. Horin

cc: Homer C. Schmidt  
Spencer C. Relyea, Esq.