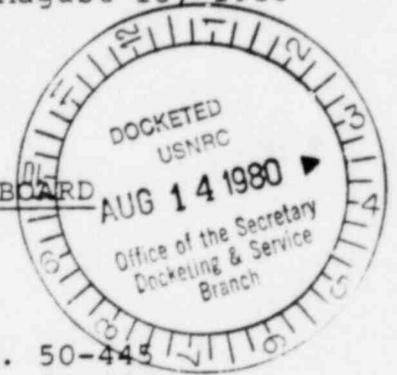


August 13, 1980

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  
CFUR AND REQUESTS TO PRODUCE

Pursuant to 10 C.F.R. §§2.740b and 2.741, Texas Utilities Generating Company, et al. ("Applicants") hereby serve Applicant's First Set of Interrogatories and Requests to Produce upon Citizens for Fair Utility Regulation ("CFUR"). Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to CFUR, 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 CFUR, 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 preceeding each answer or response.

These interrogatories and requests shall be continuing in nature. Thus, any time CFUR obtains information which renders any previous response incorrect or indicates that a

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response was incorrect when made, CFUR should supplement its previous response to the appropriate interrogatory or request to produce. CFUR 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 2: One or more of the reports used in the construction of computer codes for the CPSES/FSAR have not been suitably verified and formally accepted; thus conclusions based upon these computer codes are invalid.

1. Please state in your own words the meaning of Contention 2.
2. What is your basis for Contention 2? Please list all documents not elsewhere identified upon which you rely with respect to Contention 2. Please provide copies of all such documents for inspection and copying.
3. Have you prepared any report, study or analysis with respect to Contention 2? If so, please identify each such report, study or analysis by subject and author, including the author's professional and educational background. Please provide each such report, study or analysis for inspection and copying.

4. Have you caused others to prepare any report, study or analysis with respect to Contention 2? 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.
5. What are the dates of the meetings or contacts you have had with the other intervening parties with respect to Contention 2? Please specify the purpose of such meetings or contacts and the results of such meetings or contacts.
6. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 2? Please identify the purpose and dates of those meetings or contacts, the other persons involved, and the results of such meetings or contacts.
7. Do you plan to participate in the upcoming hearing with respect to Contention 2? If so, what will be the extent of your participation?
8. Do you plan to file testimony in the upcoming hearing with respect to Contention 2? If so, who will be the sponsor (i.e., witness) of that testimony? Please set forth the nature of such testimony and the professional and educational background of the witness. Please provide copies of that testimony. Also, please identify by title, subject matter, and author, and provide for inspection and copying, any documents which any such testimony will rely upon.
9. Do you plan to call any witness in the upcoming hearing with respect to Contention 2? 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 2.
10. If you plan to call any witness in the upcoming hearing with respect to Contention 2, please specify the nature and scope of that person's testimony. Please provide copies of such testimony. Please state whether that witness has conducted any research or made any studies which the witness intends to rely upon. Also, identify by title, subject matter, and author, and provide for inspection and copying, any document which such witness will rely upon in their testimony with regard to Contention 2.

11. What are the "reports" used in the Applicants' Final Safety Analysis Report ("FSAR") which you contend have not been suitably verified and formally accepted? Please identify each of those reports with specificity.
12. What is the basis (legal and/or other) for your response to Interrogatory 11?
13. Do you contend that any of the reports identified in your response to Interrogatory 11 are inaccurate?
14. If your response to Interrogatory 13 is in the affirmative, please identify those reports and specify the nature and substance of each alleged inaccuracy.
15. What is your basis (legal and/or other) for your response to Interrogatory 14?
16. What are the computer codes used in the Comanche Peak FSAR which you contend are not able to provide valid conclusions?
17. What is your basis (legal and/or other) for your response to Interrogatory 16?
18. Do you contend that any of the computer codes identified in Interrogatory 16 are inaccurate?
19. If your response to Interrogatory 18 is in the affirmative please specify each alleged inaccuracy.
20. What is your basis (legal and/or other) for your response to Interrogatory 19?
21. Do you contend that the NRC Staff should not verify and accept any of the reports or computer codes identified above?
22. If your response to Interrogatory 21 is in the affirmative please specify those reports or computer codes which you contend should not be verified. Please specify the precise objections you have to use of those reports or computer codes.
23. What is your basis (legal and/or other) for your response to Interrogatory 22?

24. Precisely what do you contend the Applicants must do to have the reports or computer codes identified above "suitably verified"?
25. Precisely what do you contend the NRC Staff must do to "suitably verify" the reports and computer codes identified above?
26. What are your bases (legal and/or other) for your responses to Interrogatories 24 and 25?
27. What do you contend the Applicants must do to have the reports and computer codes identified above "formally accepted"?
28. What do you contend the NRC Staff must do to "formally accept" the reports and computer codes identified above?
29. What are your bases (legal and/or other) for your responses to Interrogatories 27 and 28?
30. What do you contend the Applicants must do to demonstrate that the reports and computer codes identified above have been "suitably verified and formally accepted"?
31. What do you contend the NRC Staff must do to demonstrate that the reports and computer codes identified above have been "suitably verified and formally accepted"?
32. What are your bases (legal and/or other) for your responses to Interrogatories 30 and 31?
33. What are the "conclusions" based upon the computer codes identified above which you contend are "invalid"?
34. In what way are the "conclusions" identified in Interrogatory 33 "invalid"? Please specify the nature and substance of your objection.
35. What is your basis (legal and/or other) for your response to Interrogatory 34?
36. Do you intend to challenge in the upcoming hearings the accuracy of any of the reports or computer codes identified above?
37. If your answer to Interrogatory 36 is in the affirmative, please specify those reports and computer codes which you intend to challenge in the upcoming hearings.

38. If your response to Interrogatory 36 is in the affirmative, please set forth with specificity the nature and substance of your challenge(s).
39. What is your basis (legal and/or other) for your response to Interrogatory 38?
40. Have you reviewed the Applicants' Final Safety Analysis Report ("FSAR")? If not, why not? If so, please answer the following:
  - a. Do you object to any of the information, data or analyses contained or referenced therein with respect to computer codes or reports used to construct those computer codes?
  - b. If your answer to a. is in the affirmative, please identify those objections by the section of the FSAR to which you object and the substance of each of your objections.
  - c. What is the basis (legal and/or other) for your response to b.?
41. Do you contend the Licensing Board must review each computer code and applicable report used in the FSAR?
42. If your response to Interrogatory 41 is in the affirmative, please specify the basis (legal and/or other) for your response. Also, specify the type of review and the evidence which you contend must be presented by the Applicants and/or the NRC Staff to demonstrate the acceptability of those computer codes and reports to the Board.
43. If your response to Interrogatory 41 is in the negative, do you contend that the Board must review any of the computer codes and applicable reports set forth in the FSAR?
44. If your response to Interrogatory 43 is in the affirmative, please specify those computer codes and reports which you contend the Board must review and the basis (legal and/or other) for your response. Also, specify the evidence which you contend must be presented by the Applicants and/or the NRC Staff to demonstrate the acceptability of those computer codes to the Board.
45. If your response to Interrogatories 41 and 43 are in the affirmative, what kind of review do you contend the Board must conduct? Please specify the roles and responsibilities of the Applicants, the Staff and the Board in that review.

46. What is your basis (legal and/or other) for your response to Interrogatory 45?
47. Precisely what do you believe is the purpose of each report and computer code which you contend has not been suitably verified and formally accepted?
48. Do you contend that any of the computer codes or reports which you believe have not been suitably verified and formally accepted do not satisfy the purpose for which they are intended as you set forth in your response to Interrogatory 47? If so, please specify your objections.
49. What are your bases (legal and/or other) for your responses to Interrogatories 47 and 48?
50. Do you contend that any of the computer codes used in the FSAR are not applicable to Comanche Peak? If so, please specify.
51. Do you contend that any of the reports used in the FSAR are not applicable to Comanche Peak? If so, please specify.
52. What are your bases (legal and/or other) for your responses to Interrogatories 50 and 51?
53. If your response to either Interrogatory 50 or 51 was in the affirmative, do you contend that the Applicants must demonstrate the applicability of the codes or reports to Comanche Peak? If so, how do you contend that the Applicants must demonstrate that applicability?
54. What is your basis (legal and/or other) for your response to Interrogatory 53?
55. If your response to either Interrogatory 50 or 51 was in the affirmative, do you contend that the Staff must demonstrate the applicability of the codes or reports to Comanche Peak? If so, how do you contend that the Staff must demonstrate that applicability?
56. What is your basis (legal and/or other) for your response to Interrogatory 55?
57. Do you contend that the Staff's method of review of reports and computer codes is inadequate?
58. If your response to Interrogatory 57 is in the affirmative, what is the basis (legal and/or other) for your response?

59. If your response to Interrogatory 57 is in the affirmative, please specify the nature and substance of the inadequacies which you contend are present in the Staff's review.
60. Do you agree that all computer codes and reports used in the Applicants' FSAR which are not identified in your responses to Interrogatories 11 and 16 have been suitably verified and formally accepted and provide valid conclusions?
61. If your response to Interrogatory 60 is in the negative, please explain. Please set forth the nature and substance of your disagreement with that statement.
62. What is your basis (legal and/or other) for your response to Interrogatory 61?
63. Specify those NRC requirements you contend are not satisfied because certain reports and computer codes have "not been suitably verified and formally accepted." What is your basis (legal and/or other) for your response.

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 2, 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.

64. Please state in your own words the meaning of Contention 5.
65. 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.

66. 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 report, study or analysis.
67. 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.
68. 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.
69. 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.
70. 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.
71. 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.

72. 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.?
73. What do you mean by "Applicants' failure to adhere"?
74. What do you contend Applicants' must do to satisfy those provisions of the construction permits identified in Interrogatory 72a. above?
75. What is your basis (legal and/or other) for your answer to Interrogatory 74?
76. 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.?
77. What do you contend the Applicants must do to satisfy the provisions of 10 C.F.R. Part 50, Appendix B?
78. What is your basis (legal and/or other) for your answer to Interrogatory 77?
79. Which of the specific "construction practices employed" listed in Contention 5 do you intend to challenge with respect to Comanche Peak?
80. 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?

81. 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?
82. 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 79. What is your basis (legal and/or other) for your response to this interrogatory?
83. Do you intend to challenge the adequacy of Applicants' "training and organization of QA/QC personnel"?
84. If your answer to Interrogatory 83 is in the affirmative, please specify those aspects of Applicants' training and organization of QA/QC personnel which you intend to challenge.
85. If your answer to Interrogatory 83 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?
86. What do you believe the Applicants must do to satisfy those requirements set forth by you in your response to Interrogatory 85?
87. What is your basis (legal and/or other) for your response to Interrogatory 86?
88. Please state in your own words what the term "substantial questions" means in Contention 5.
89. Please indicate in your own words what the term "adequacy" means in Contention 5.
90. Which findings required by 10 C.F.R. §50.57(a) do you contend cannot be made with respect to Comanche Peak?
91. What is your basis (legal and/or other) for your response to Interrogatory 90?
92. 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 90 to be made?

Contention 7: Applicants have failed to adequately evaluate whether the rock "overbreak" and subsequent fissure repair using concrete grout have impaired the ability of category I structures to withstand seismic disturbances.

93. Please state in your own words the meaning of Contention 7?
94. What is your basis for Contention 7? Please list all documents not elsewhere identified on which you rely with respect to Contention 7. Please provide copies of all such documents for inspection and copying.
95. Have you prepared, or have you caused to be prepared any report, study or analysis in connection with Contention 7? If so, please identify any such report, study or analysis by subject and author, including the author's professional and educational background. Please provide a copy of any such reports, study or analysis for inspection and copying.
96. Have you caused others to prepare any report, study or analysis in connection with Contention 7? If so, please identify any such report, study or analysis by subject and author, including the professional and educational background of the author. Please provide for inspection and copying any such report, study or analysis on which you intend to rely.
97. What are the dates of the meetings or contacts you have had with the other intervening parties with respect to Contention 7? Please specify the purpose of such meetings or contacts, and the results of such meetings or contacts.
98. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 7? Please specify the purpose and dates of those meetings or contacts, the other persons involved, and the results of such meetings or contacts.
99. Do you plan to participate in the upcoming hearing on Contention 7? If so, what will be the extent of your participation?

100. Do you plan to file testimony in the upcoming hearing with respect to Contention 7? 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.
101. Do you plan to call any witness in the upcoming hearing with respect to Contention 7? 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 that person's qualifications to testify in this proceeding on Contention 7.
102. If you plan to call any witness in the upcoming hearing with regard to Contention 7, please specify the nature and scope of his or her testimony. Please provide copies of such testimony. Please state whether that witness has conducted any research or made any studies which the witness intends to rely on. Also, identify by title, subject matter and author, and provide copies for inspection and copying, any document which any such witness will rely upon in their testimony with regard to Contention 7.
103. Precisely what do you contend Applicants must do to "adequately evaluate" rock overbreak?
104. Precisely what do you contend Applicants must do to "adequately evaluate" subsequent fissure repair using concrete grout?
105. What are your bases (legal and/or other) for your responses to Interrogatories 103 and 104?
106. Are there any other instances of rock overbreak and subsequent fissure repair other than those identified in I&E Inspection Report 75-05 which you intend to challenge?
107. If your response to Interrogatory 106 is in the affirmative, please identify those other instances.
108. What is your basis (legal and/or other) for your response to Interrogatory 107?
109. Do you contend that the NRC Staff is unable to "adequately evaluate" rock overbreak and subsequent fissure repair?
110. If your response to Interrogatory 109 is in the affirmative, please explain your response.

111. What is your basis (legal and/or other) for your response to Interrogatory 110?
112. Have you reviewed the Applicants' FSAR? If not, please explain. If so, please answer the following:
  - a. Do you object to any of the information, data or analysis contained or referenced therein with respect to the evaluation of rock overbreak and subsequent fissure repair?
  - 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 objection.
  - c. What are your bases (legal and/or other) for your responses to a. and b.?
  - d. Specifically, do you contend that any of the specifications or procedures used in repairing rock overbreak are inadequate?
  - e. If your answer to d. is in the affirmative, please specify and explain the substance and nature of your objections.
  - f. What are your bases (legal and/or other) for your responses to d. and e.?
113. Do you contend that Applicants' evaluation and determination of the static, dynamic and engineering properties of the materials underlying the site are inadequate? If so, please specify your objections.
114. What is your basis (legal and/or other) for your response to Interrogatory 113?
115. Do you contend that the measures taken to repair rock overbreak render Applicants' evaluation and determination of the static, dynamic and engineering properties of the material underlying the site inadequate? If so, please specify the nature and substance of your objections.
116. What is your basis (legal and/or other) for your response to Interrogatory 115?
117. Do you contend that any of the investigations or other activities required by 10 C.F.R. Part 100 Appendix A have not been properly performed? If so, please specify.

118. What is your basis (legal and/or other) for your response to Interrogatory 117?
119. Do you contend that the Applicants' determination of the safe shutdown earthquake for the site is erroneous? If so, please specify the nature and substance of your objections.
120. Do you contend that the Applicants have not properly taken into account the fissure repair which is the subject of Contention 7 in determining the design basis associated with the safe shutdown earthquake? If so, please specify the nature and substance of your objections.
121. What are your bases (legal and/or other) for your responses to Interrogatories 119 and 120?
122. Do you contend that the Applicants have not adequately evaluated the effect of man's activities on actual or potential surface or subsurface subsidence, uplift or collapse at the Comanche Peak site? If so, please specify the nature and substance of your objections.
123. What is your basis (legal and/or other) for your response to Interrogatory 122?
124. Do you contend that any tests must be done to evaluate the concerns which you have with respect to Contention 7? If so, please specify the purpose and procedure for each such tests with particularity.
125. What is your basis (legal and/or other) for your response to Interrogatory 124?
126. If your response to Interrogatory 124 is in the affirmative, please identify who you believe should conduct those tests.
127. What is your basis (legal and/or other) for your response to Interrogatory 126?
128. Do you contend that reports and/or analyses must be done with respect to your concerns expressed in Contention 7? If so, please specify the nature and substance of those reports and/or analyses.
129. What is your basis (legal and/or other) for your response to Interrogatory 128?

130. What structures do you contend are affected by the rock overbreak and subsequent fissure repair? Please specify those structures and the alleged effect of the rock overbreak and fissure repair on those structures.
131. Do any of your responses to the above Interrogatories differ for the various structures identified in your response to Interrogatory 130? If so, please specify which interrogatories your answers differ on and set forth the answer for those interrogatories with respect each of those structures.
132. What is your basis (legal and/or other) for your response to Interrogatory 131?

Contention 8: Applicants have failed to adequately evaluate the impacts of the drawdown of the groundwater under CPSES during and as a result of plant operation.

133. Please state in your own words the meaning of Contention 8.
134. What is your basis for Contention 8? Please list all documents not elsewhere identified on which you rely with respect to Contention 8. Please provide copies of all such documents for inspection and copying.
135. Have you prepared, or have you caused to be prepared, any report, study or analysis in connection with Contention 8? If so, please identify any such report, study or analysis by subject and author, including the author's professional and educational background. Please provide a copy of such report, study or analysis for inspection and copying.
136. Have you caused others to prepare any report, study or analysis in connection with Contention 8? If so, please identify any such report, study or analysis by subject and author including the professional and educational background of the author. Please provide for inspection and copying any such report, study or analysis on which you intend to rely.
137. What are the dates of meetings or contacts you have had with the other intervening parties with respect to Contention 8? Please specify the purpose of such meetings or contacts, and the results of such meetings or contacts?

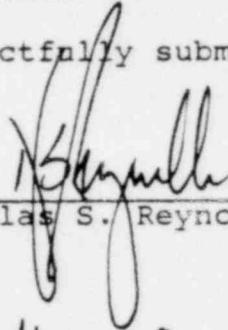
138. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 8? Please specify the purpose and dates of those meetings or contacts, the other persons involved, and the results of such meetings or contacts.
139. Do you plan to participate in the upcoming hearing with respect to Contention 8? If so, what will be the extent of your participation?
140. Do you plan to file testimony in the upcoming hearing with respect to Contention 8? 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.
141. Do you plan to call any witnesses in the upcoming hearing with respect to Contention 8? 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 with respect to Contention 8.
142. If you plan to call any witness in the upcoming hearing with respect to Contention 8, please specify the nature and scope of his or her testimony. Please provide copies of such testimony. Please state whether that witness has conducted any research or made any studies which the witness intends to rely on. Also, identify by subject matter and author, and provide for inspection and copying, documents which any such witness will rely upon in their testimony with regard to Contention 8.
143. Have you read the Applicants' Environmental Report-Operating License Stage ("ER-OL")? 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 effects of groundwater withdrawal during operation of Comanche Peak?
  - 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.?
144. Do you contend that Applicants must perform additional studies or analyses with respect to the potential effects of groundwater withdrawal during operation of Comanche Peak? If so, please specify the nature and substance of those reports or analyses which you contend must be done.
145. What is the basis (legal and/or other) for your response to Interrogatory 144?
146. What is the maximum rate of groundwater withdrawal which you contend should be permitted during the operation of Comanche Peak?
147. What is your basis (legal and/or other) for your response to Interrogatory 146?
148. What is the maximum level of groundwater drawdown which you contend should be permitted during operation of Comanche Peak?
149. What do you contend would be the effects of a greater drawdown level than that specified in your response to Interrogatory 148?
150. How do you contend that the level of drawdown of groundwater be measured? Please specify as to parameters such as timing, location, etc.
151. What are your bases (legal and/or other) for your responses to Interrogatories 148 through 150?
152. What measures do you contend the Applicants must take in the event the groundwater level drops below that specified in your response to Interrogatory 148?
153. Do you contend that a particular level of groundwater must be maintained to assure the safe operation of Comanche Peak regardless of whether water supplies can be obtained from sources other than groundwater? If so, what is that level?
154. What are the adverse effects on Comanche Peak operation that you contend would occur if the groundwater level drops below that level specified in your response to Interrogatory 153?

155. What are your bases (legal and/or other) for your responses to Interrogatories 152 through 154?
156. Do you contend that the operation of Comanche Peak will be the only cause of groundwater level reduction?
157. If your response to Interrogatory 156 is in the affirmative, please state the basis for your response thereto.
158. If your response to Interrogatory 156 is in the negative, please specify the other causes of groundwater withdrawal and level reduction which you recognize?
159. What are the withdrawal rates and respective contributions to reduction in the groundwater level of each of those causes identified in your response to Interrogatory 158?
160. What are your bases (legal and/or other) for your responses to Interrogatories 158 and 159?
161. Do you contend that Applicants should not withdraw groundwater at all during the operation of Comanche Peak?
162. Do you contend that in the event Applicants do not utilize groundwater they would be unable to obtain water from other means? If so, please explain.
163. What are your bases (legal and/or other) for your responses to Interrogatories 161 and 162?
164. Do you contend that Applicants should reduce their use of groundwater during operation of Comanche Peak to levels other than those specified in the ER-OL? If so, please explain.
165. If your response to Interrogatory 164 is in the affirmative, please specify the basis for your response.
166. If your response to Interrogatory 164 is in the negative, what do you contend would be that level and what factors do you contend should be considered in reaching the decision to obtain water from other means.

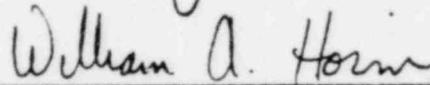
167. What is your basis (legal and/or other) for your response to Interrogatory 166?

Respectfully submitted,



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Nicholas S. Reynolds



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(202) 857-9817

Counsel for Applicants

August 13, 1980

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	)	
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' First Set Of Interrogatories To CFUR 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 13th day of August, 1980:

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