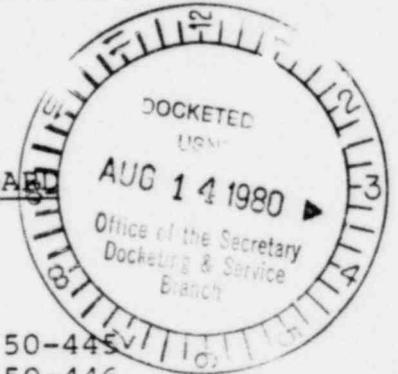


August 13, 1980

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
ACORN 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 Texas Association of Community Organizations for Reform Now ("ACORN"). Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to ACORN, 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 ACORN, 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.

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

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response was incorrect when made, ACORN should supplement its previous response to the appropriate interrogatory or request to produce. ACORN 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, ACORN 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 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.

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 otherwise 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 copies of any such reports, studies or analyses for inspection and copying.
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. Have any of the individuals and/or groups identified in Interrogatory 5 prepared any reports, studies or analyses for you in regard to Contention 5? If so, please identify the subject of each such report, study or analysis and the author of the report, study or analysis, including that author's professional and educational background.
7. 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.
8. 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.

9. 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.
10. 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.?
11. What do you mean by "Applicants' failure to adhere"?
12. What do you contend Applicants' must do to satisfy those provisions of the construction permits identified in Interrogatory 10a. above?
13. What is your basis (legal and/or other) for your answer to Interrogatory 12?
14. 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.?
15. What do you contend the Applicants must do to satisfy the provisions of 10 C.F.R. Part 50, Appendix B?
16. What is your basis (legal and/or other) for your answer to Interrogatory 15?

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

29. What is your basis (legal and/or other) for your response to Interrogatory 28?
30. 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 28 to be made?

Contention 13: Present fire protection measures proposed by Applicants are not adequate to minimize the probability and effect of a fire from disabling the electric cables for all redundant safety systems; thus, General Design Criterion 3 has not been satisfied.

31. Please state in you own words the meaning of Contention 13.
32. What is your basis for Contention 13? Please list all documents not elsewhere identified on which you rely with respect to Contention 13. Please provide all such documents for inspection and copying.
33. Have you prepared or have you caused to be prepared any report, study or analysis in connection with Contention 13? If so, please identify any such report, study or analysis 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.
34. What are the dates of the meetings or contacts you have have had with the other intervening parties with respect to Contention 13? 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 13? Please identify the purpose of 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 with respect to Contention 13? 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 13? 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 by subject and author and provide for inspection and copying any documents which such testimony will rely upon with regard to Contention 13.
38. Do you plan to call any witnesses in the upcoming hearing with respect to Contention 13? If so, please provide a summary of his or her professional background. Also, set forth any information which has a bearing on his or her qualifications to testify in this proceeding on Contention 13.
39. If you plan to call any witness in the upcoming hearing with respect to Contention 13, please specify the nature and scope of his or her testimony. Please provide copies of such testimony. Also, please identify by subject and author, and provide for inspection and copying, any documents which such witness will rely upon in their testimony with regard to Contention 13.
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 measures "to minimize the probability and effect" of a fire from disabling the electric cables for all redundant safety systems?
 - b. If your response to a. is in the affirmative, please specify your objections by identifying the sections of the FSAR 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.?
41. What are the particular "fire protection measures" with which you are concerned in Contention 13?
42. Do you contend that certain fire protection procedures are not adequate to minimize the probability and effect of a fire from disabling the electric cables for all redundant safety systems.

43. What are your bases (legal and/or other) for your responses to Interrogatories 41 and 42?
44. What do you mean by "are not adequate" in Contention 13?
45. What is your basis for your response to Interrogatory 44?
46. What do you mean by the term "minimize" in Contention 13?
47. Are there any other considerations which you believe should be factored into any determination of whether fire protection measures adequately minimize the probability and effect of fires from disabling the electric cables for all redundant safety systems?
48. What are your bases (legal and/or other) for your responses to Interrogatories 46 and 47?
49. Do you intend to postulate any particular scenario, which you contend Applicants have not already adequately addressed, with respect to fires with the potential for disabling electric cables for all redundant safety systems?
50. If your response to Interrogatory 49 is in the affirmative, please set forth any such scenario, including all assumptions analyses and conclusions.
51. What "effects" of fire do you contend the Applicants have not adequately dealt with?
52. What are the sources of fires with which you are concerned in Contention 13?
53. With respect to those fires identified in your response to Interrogatory 52, please specify the postulated location of the initiation of the fire and the method and path of propagation?
54. Under what specific conditions do you contend electric cables would be "disabled"?
55. What do you contend constitutes "disabling" of electric cables?
56. Specifically which electric cables do you contend would be disabled if Applicants do not provide the fire protection measures you contend should be provided?
57. What do you mean by "electric cables for all redundant safety systems"?

58. Please identify each redundant safety system which you contend is not adequately protected from a fire?
59. What are your bases (legal and/or other) for your responses to Interrogatories 49 through 58?
60. Do you contend that the electric cables for all redundant safety systems are themselves not designed to adequate specifications or standards? If so, please specify the nature and substance of your objections.
61. Do you contend that the electric cables for all redundant safety systems are not properly located to minimize the probability in effect of fires? If so, please specify the nature and substance of your objections.
62. What are your bases (legal and/or other) for your responses to Interrogatories 60 and 61?
63. Do you contend that any of the materials used in the Comanche Peak facility which would affect the ability to minimize the probability and effect of fires that could disable electrical cables for redundant safety systems are not the proper materials? If so, please specify the particular materials which you contend are inadequate, the substance of your objections and identify the materials which you contend should be used in their place.
64. What is your basis (legal and/or other) for your response to Interrogatory 63?
65. Do you contend that any fire detection systems are not of the appropriate capacity and capability to minimize the effects of fires on the electric cables for all redundant safety systems?
66. If your response to Interrogatory 65 is in the affirmative, please specify the nature and substance of your objections and identify those fire detection systems which you contend should be used at Comanche Peak.
67. What are the bases (legal and/or other) for your responses to Interrogatories 65 and 66?
68. Do you contend that any of the fire fighting systems are not of the appropriate capacity and capability to minimize the adverse effects of fires on the electric cables for all redundant safety systems?

69. If your response to Interrogatory 68 is in the affirmative, please specify the nature and substance of your objections and identify the particular fire fighting systems which you contend should be used at Comanche Peak?
70. What are your bases (legal and/or other) for your responses to Interrogatories 68 and 69?

Contention 16: The CPSES design does not provide adequate equipment outside of the control room to promptly put the reactor in hot shutdown and so maintain it until attaining cold shutdown (also from outside the control room) as required by General Design Criterion 19 of Appendix A to 10 CFR Part 50.

71. Please state in your own words the meaning of Contention 16.
72. What is your basis for Contention 16? Please list all documents not elsewhere identified on which you rely with respect to Contention 16. Please provide copies of all such documents for inspection and copying.
73. Have you prepared any report, study or analysis with respect to Contention 16? If so, please identify any such report, study or analysis by subject and author, including the author's educational and professional background. Please provide for inspection and copying any such report, study or analysis on which you intend to rely.
74. What are the dates of the meetings or contacts you have had with the other intervening parties with respect to Contention 16? Please specify the purpose of such meetings or contacts and the results of such meetings or contacts.
75. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 16? Please specify the purpose of such meetings or contacts and the results of such meetings or contacts.
76. Do you plan to participate in the upcoming hearing on Contention 16? If so, what will be the extent of your participation?

77. Do you plan to file testimony in the upcoming hearing with respect to Contention 16? 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 by subject and author, and provide for inspection and copying, any documents relied on in such testimony.
78. Do you plan to call any witness in the upcoming hearing with respect to Contention 16? If so, please provide a summary of his or her professional background. Also, set forth any information which has a bearing on his or her qualifications to testify in this proceeding on Contention 16.
79. If you plan to call any witness in the upcoming hearing with regard to Contention 16, please specify the nature and scope of that witness's 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 such witness will rely upon in their testimony with regard to Contention 16.
80. Have you reviewed the Applicants' Final Safety Analysis Report ("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 designation of equipment and procedures for obtaining prompt hot shutdown of the reactor from outside the control room?
 - b. Do you object to any of the information, data or analyses contained or referenced therein with respect to providing for the potential capability for subsequent cold shutdown of the reactor through the use of suitable procedures?
 - c. If your answer to either a. or b. is in the affirmative, please specify your objections by identifying the sections of the FSAR to which you object and the substance of your objections.
 - d. What are your bases (legal and/or other) for your responses to a. b., and c. above?
81. Precisely what equipment not provided at Comanche Peak do you contend must be provided to put the reactor in hot shutdown from outside the main control room?

82. Precisely what equipment do you contend not provided at Comanche Peak must be provided to have a potential capability to attain cold shutdown from outside the main control room?
83. Where do you contend the equipment which you identified in your responses to Interrogatories 81 and 82 must be located?
84. Precisely what equipment not provided at Comanche Peak do you contend must be provided to maintain hot shutdown until attaining cold shutdown from outside the main control room?
85. Where do you contend the equipment identified in your response to Interrogatory 84 must be located?
86. What are your bases (legal and/or other) for your responses to Interrogatories 81 through 85?
87. What instrumentation and controls not provided at Comanche Peak do you contend must be provided to maintain the reactor in a safe condition during hot shutdown?
88. Do you contend that any instruments and controls besides those identified in your response to Interrogatory 87 which are not provided at Comanche Peak, must be provided to satisfy your concerns as set forth in Contention 16?
89. What are your bases (legal and/or other) for your responses to Interrogatories 87 and 88?
90. What suitable procedures not provided for at Comanche Peak do you contend are necessary to attain cold shutdown of the reactor from outside the control room?
91. What is your basis for your response to Interrogatory 90?
92. Where do you contend that the instruments and controls identified in your response to Interrogatory 87 need be located?
93. What are your bases (legal and/or other) for your responses to Interrogatory 92?
94. Do you contend that any equipment required for safe shutdown cannot be operated from controls remote from the main control room? If so, please specify.
95. Do you contend that any of the controls regarding access to local control panels are inadequate? If so, please specify.

96. What are your bases (legal and/or other) for your responses to Interrogatories 94 and 95?
97. Do you contend that any of the equipment used to attain safe shutdown remote from the main control room is not designed to the requisite standards or criteria? If so, please specify.
98. What is your basis for your response to Interrogatory 97?
99. Do you contend that adequate indicators to alert persons in the main control room of actuation of remote controls are not provided?
100. What is your basis for your response to Interrogatory 99?

Contention 20: The CPSES design does not adequately insure that safety-related water supplies will be available for plant operation in the event of ice buildup at the service water intake structure.

101. Please state in your own words the meaning of Contention 20.
102. What is your basis for Contention 20? Please list all documents not elsewhere identified on which you rely with respect to Contention 20. Please provide copies of all such documents for inspection and copying.
103. Have you prepared or have you caused to be prepared any report, study or analysis in connection with Contention 20? If so, please identify any such report, study or analysis by subject and author, including the author's professional and educational background. Please provide any such report, study or analysis for inspection and copying.
104. What are the dates of the meetings or contacts you have had with the other intervening parties with respect to Contention 20? Please specify the purpose of such meetings or contacts, and the results of such meetings or contacts.
105. What are the dates of the meetings or contacts you have had with the other intervening parties with respect to Contention 20? Please identify the purpose of such meetings, or contacts, the other persons involved, and the results of such meetings or contacts.

106. Do you plan to participate in the upcoming hearing on Contention 20? If so, what will be the extent of your participation?
107. Do you plan to file testimony in the upcoming hearing with respect to Contention 20? 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 provide for inspection and copying any documents relied on in such testimony.
108. Do you plan to call any witnesses in the upcoming hearing with respect to Contention 20? If so, please provide a summary of his or her professional background. Also, set forth any information which has a bearing on his or her qualifications to testify in this proceeding on Contention 20.
109. If you plan to call any witness in the upcoming hearing with regard to Contention 20, 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, documents which any such witness will rely upon in their testimony with regard to Contention 20.
110. 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 consideration of freeze protection at the service water intake structure?
 - 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. What are your bases (legal and/or other) for your responses to a. and b.?
111. Please specify precisely where and in what manner you contend ice would cause the service water intake structure to be unable to perform any function necessary for safe operation.

112. Please specify the conditions (e.g., water level, flow rates, meteorological conditions, etc.) which you contend would cause ice to prevent operations of the service water intake structure necessary for safe operation.
113. Do you contend that ice would form within the service water intake building as opposed to ice formed outside of the building being drawn into the service water intake building?
114. What are your bases (legal and/or other) for your responses to Interrogatories 111 through 113?
115. How thick do you contend ice could become on the safe shutdown impoundment?
116. Do you contend that ice formed on the surface of the safe shutdown impoundment could break up and flow into the service water intake structure and thus prevent uptake of adequate safety-related water supplies?
117. What is the minimum water temperature you contend might occur in the safe shutdown impoundment.
118. What are your bases (legal and/or other) for your responses to Interrogatories 115 through 117?
119. Please specify precisely how you contend ice buildup at service water intake structures at other plants is related to possible ice buildup in the Comanche Peak service water intake structure.
120. Do you contend that the ice could block the water intake openings of the service water intake structures?
121. Do you contend that the ice could block and prevent the operation of the screens?
122. Do you contend that the ice could block and prevent the operation of the stop gates?
123. Do you contend that the ice would prevent operation of the service water pump?
124. What are your bases (legal and/or other) for your responses to Interrogatories 119 through 123?

125. Do you contend that Applicants would not be able to properly respond in the event that ice buildup at the service water intake structure prevented safety-related water supplies from being available for plant operation?
126. If your response to Interrogatory 125 is in the affirmative, please set forth with particularity the sequence of events which you contend could prevent safe operation of Comanche Peak.
127. What is your basis to your response to Interrogatory 126?
128. Do you contend that an ice storm could be the cause of the ice build up at the service water intake structure?
129. If your answer to Interrogatory 128 is in the affirmative, please specify what you mean by "ice storm"?
130. What is the sequence of events which you contend would occur in an ice storm to prevent safety-related water from being supplied through the service water intake structure?
131. What are your bases (legal and/or other) for your responses to Interrogatories 128 through 130?
132. How often do you contend conditions could exist for ice buildup at the service water intake structure to prevent necessary operation thereof?
133. Specify the measures which you contend Applicants must take to prevent ice buildup at the service water intake structure from causing any danger to the safe operation of Comanche Peak.
134. In your response to Interrogatory 133 please identify the specific structures, equipment and procedures which you contend must be changed to prevent ice buildup at the service water intake structure from posing any danger to the safe operation of Comanche Peak.
135. How do you contend Applicants should incorporate the specific structures, equipment or procedures identified in your responses to Interrogatory 134 in the service water intake structure?

136. What are your bases (legal and/or other) for your responses to Interrogatories 132 through 135?
137. Do you contend that ice buildup at the service water intake structure could totally prevent uptake of safety-related water supplies?
138. If your response to Interrogatory 137 is in the negative, please specify the extent to which you contend ice buildup could prevent uptake of safety-related water supplies.
139. For what period of time do you contend ice buildup could prevent uptake of safety-related water supplies?
140. What rate of water uptake from the safe shutdown impoundment do you contend is necessary for "safety-related water supplies"?
141. What are your bases (legal and/or other) for your responses to Interrogatories 137 through 140?

Contention 22f: Applicants have failed to comply with 10 CFR Part 50, Appendix E, regarding emergency planning, for the following reasons:

- f. There is no provision for emergency planning for Glen Rose or the Dallas/Ft. Worth metroplex.
142. Please state in your own words the meaning of Contention 22f.
143. What is your basis for Contention 22f? Please list all documents not elsewhere identified on which you rely with respect to Contention 22f. Please provide all documents for inspection and copying.
144. Have you prepared any report, study or analysis in connection with Contention 22f? If so, please identify any such report, study or analysis 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.
145. Have you caused others to prepare any report, study or analysis in connection with Contention 22f? If so, please identify any such report, study or analysis 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.

146. What are the dates of the meetings or contacts you have had with the other intervening parties with respect to Contention 22f? Please specify the purpose of such meetings or contacts, and the results of such meetings or contacts.
147. What are the dates of the meetings or contacts you have had with other persons other than the intervening parties with respect to Contention 22f? Please specify the purpose of such meetings or contacts, the other persons involved, and the results of such meetings or contacts.
148. Do you plan to participate in the upcoming hearing with respect to Contention 22f? If so, what will be the extent of your participation?
149. Do you plan to file testimony in the upcoming hearing with respect to Contention 22f? 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 by subject and author and provide for inspection and copying any documents relied on in such testimony.
150. Do you plan to call any witness in the upcoming hearing with respect to Contention 22f? If so, please provide a summary of his or her professional background. Also, set forth any information which has a bearing on his or her qualifications to testify in this proceeding on Contention 22f.
151. If you plan to call any witness in the upcoming hearing with respect to Contention 22f, please specify the nature and scope of his or her testimony. Please provide copies of such testimony. Also, please identify by subject and author, and provide for inspection and copying, any documents which any such witness will rely upon in their testimony with regard to Contention 22f.
152. What type of emergency planning do you contend must be provided for Glen Rose?
153. What kind of emergency planning do you contend must be provided for the Dallas/Fort Worth metroplex?
154. Do you contend that emergency plans for Glen Rose must include evacuation procedures?
155. Do you contend that the emergency plans for Dallas/Fort Worth must include evacuation procedures?

156. Do you contend that emergency measures should vary with respect to the type of event which triggers their actuation? If so, please specify the particular emergency actions which you contend must be taken for each event identified in your response.
157. What are your bases (legal and/or other) for your responses to Interrogatories 152 through 156?
158. What is the specific role which you contend Applicants should have with respect to developing emergency plans for Glen Rose and the Dallas/Fort Worth metroplex?
159. What particular role do you contend Applicants should have with respect to the actuation of emergency plans?
160. What role do you contend Applicants should have with respect to carrying out the emergency plan measures?
161. What role do you contend state and local officials should have with respect to developing emergency plans for Glen Rose and the Dallas/Fort Worth metroplex?
162. What role do you contend state and local officials should have with respect to the actuation of emergency plans?
163. What role do you contend state and local officials should have with respect to carrying out the emergency plan measures?
164. What role do you contend the NRC should have in emergency planning for Glen Rose and the Dallas/Fort Worth metroplex?
165. What role do you contend the NRC should have with respect to the actuation of emergency plans?
166. What role do you contend the NRC should have with respect to carrying out emergency plan measures?
167. What role do you contend the Federal Emergency Management Agency ("FEMA") must have with respect to emergency planning for the Glen Rose and the Dallas/Fort Worth metroplex?
168. What role do you contend FEMA should have with respect to the actuation of emergency plans?
169. What role do you contend FEMA should have with respect to carrying out emergency plan measures?

170. What are your bases (legal and/or other) for your responses to Interrogatories 158 through 169?
171. Precisely what is the geographical area which corresponds to the area you are concerned with when you speak of "emergency planning for Glen Rose"? Please specify that area including the distance of the area from the Comanche Peak site.
172. What is the geographical area which corresponds to the region for which you contend there should be emergency planning for the "Dallas/Fort Worth metroplex"? Please specify that area and provide the distance of the area from the Comanche Peak site.
173. Should the emergency plans for these two areas differ in any way? If so, please specify.
174. What are your bases (legal and/or other) for your responses to Interrogatories 171 through 173?
175. Do you contend that emergency planning must be provided for the entire Dallas/Fort Worth metroplex as identified in your response to Interrogatory 172?
176. If your response to Interrogatory 175 is in the affirmative, please set forth with specificity the NRC requirements which you contend mandate that emergency planning be provided for the entire area which you have identified as the Dallas/Fort Worth metroplex in your response to Interrogatory 172?
177. What are the dangers which you contend might cause the need to take emergency action in the Glen Rose area?
178. What are the dangers which you contend might require emergency action to be taken in the Fort Worth area?
179. What are the dangers which you contend might require emergency measures to be taken in the Dallas area?
180. With respect to each of your responses to Interrogatories 177 through 179, please specify precisely the initiating event, the sequence of events, and the exposure pathway for radiological dangers.
181. For each of your answers to Interrogatories 175 through 180, please set forth the assumptions, analysis and conclusion and any documents relied on for your answers.

182. With respect to your answer to Interrogatories 177 through 179 please identify the specific emergency planning measures you contend should be provided for the dangers which you contend could exist.
183. What is your basis (legal and/or other) for your response to Interrogatory 182?
184. Do you contend that any particular communication capability must be provided as part of the emergency planning with which you are concerned in Contention 22f?
185. If your response to Interrogatory 184 is in the affirmative, please specify the precise capabilities and functions of the communications system which you contend must be provided.
186. What is your basis (legal and/or other) for your response to Interrogatory 185?
187. Precisely how do you contend the Applicants should demonstrate that adequate emergency planning as required for Glen Rose or the Dallas/Fort Worth metroplex has been prepared?
188. What is your basis (legal and/or other) for your response to Interrogatory 187?

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.

189. Please state in your own words the meaning of Contention 23.
190. 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.
191. 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.

192. 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.
193. 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.
194. 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.
195. Do you plan to participate in the upcoming hearing on Contention 23? If so, what will be the extent of your participation?
196. 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.
197. 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.
198. 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.

199. 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 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 low-level radiation.
 - d. What are your bases (legal and/or other) for your responses to a., b., and c.?
200. 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.?
201. 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?
202. If your answer to Interrogatory 201 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?

203. If your answer to Interrogatory 201 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?
204. 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?
205. What do you believe Applicants must do with respect to those design features identified in your response to Interrogatory 204 to bring the Comanche Peak design into compliance with the ALARA standard? What is your basis (legal and/or other) for this position?
206. What do you contend Applicants must do that they have not already done to demonstrate that the Comanche Peak design meets the ALARA standard?
207. What is your basis (legal and/or other) for your answer to Interrogatory 206? 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.
208. What kinds of radiation do you believe Applicants have not adequately addressed with respect to the health effects thereof?
209. What is your basis for your position with respect to Interrogatory 208? Please identify any documents on which you rely for your answer to Interrogatory 208. 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.
210. What are the sources of the radiation identified in Interrogatory 208? Please specify as to system and/or process, including equipment involved, which you contend provides the pathway for release of this radiation.

211. 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.
212. What exposures do you contend will be caused by the radiation levels identified in your answer to Interrogatory 211? Please identify those exposures by population affected as well as specific exposure pathways.
213. With respect to your answers to Interrogatories 211 and 212, 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 24a: 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.
214. Please explain the meaning of Contention 24a in your own words.
215. 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.
216. 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 relied on in preparation thereof.
217. 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.

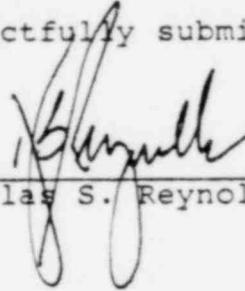
218. Have you met with or contacted any intervening party with respect to Contention 24a? If so, please give the dates of any such meetings or contacts. Also, please specify the persons involved, the purpose and the results of those meetings or contacts.
219. Have you met with or contacted any person other than an intervening party 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.
220. Do you intend to participate in the upcoming hearings with respect to Contention 24a?
221. If your answer to Interrogatory 220 is in the affirmative, please specify the nature of your intended participation in the upcoming hearings with respect to Contention 24a.
222. 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.
223. 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?
224. 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.
225. What kind of "costs" do you believe should be considered in the cost/benefit balance for Comanche Peak?
226. What is your basis (legal and/or other) for your answer to Interrogatory 225?

227. What are the "benefits" which you believe should be attributed to the Comanche Peak facility in making the cost/benefit analysis?
228. What is your basis (legal and/or other) for your answer to Interrogatory 227?
229. Do you contend a methodology other than is currently used should be employed in making the cost/benefit balance for the Comanche Peak facility?
230. What is your basis (legal and/or other) for your response to Interrogatory 229?
231. 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?
232. List these criteria in order of importance in making a cost/benefit balance.
233. What are your bases (legal and/or other) for your responses to Interrogatories 231 and 232?
234. 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?
235. What is your basis (legal and/or other) for your response to Interrogatory 234?
236. What "costs" do you contend have not been adequately considered with respect to decommissioning in the Comanche Peak cost/benefit analysis?
237. What is your basis (legal and/or other) for your answer to Interrogatory 236?
238. What is your basis (legal and/or other) for contending that such costs need be considered in the Comanche Peak cost/benefit balance?
239. 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?
240. If your response to Interrogatory 239 is in the affirmative, please supply such analysis for inspection and copying.

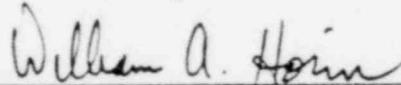
241. Do you contend that the cost/benefit analysis for Comanche Peak would not favor operation of the facility even if the costs identified in your response to Interrogatory 236 were considered? If so, please explain and provide the basis for your answer.
242. What do you contend Applicants must do to demonstrate that the cost/benefit balance for Comanche Peak has adequately considered the "costs" of decommissioning?
243. What is your basis (legal and/or other) for your response to Interrogatory 242?
244. 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?
245. What is your basis for your response to Interrogatory 244?
246. What do you mean by the term "safely" in Contention 24a?
247. What is your basis (legal and/or other) for your response to Interrogatory 246?
248. Do you contend that any particular mode of decommissioning must be evaluated in the Comanche Peak cost/benefit analysis?
249. If your answer to Interrogatory 248 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?
250. 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.
251. What is your basis (legal and/or other) for your response to Interrogatory 250?
252. 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.

253. What is your basis (legal and/or other) for your response to Interrogatory 252?
254. 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?
255. How do you contend this dollar cost should be factored into the cost/benefit analysis?
256. What are your bases (legal and/or other) for your responses to Interrogatories 254 and 255?
257. What do you contend is the dollar cost of decommissioning which if applied to the Comanche Peak cost/benefit balance would tip the balance away from favoring operation of the facility?
258. What is your basis (legal and/or other) for your response to Interrogatory 257?

Respectfully submitted,



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Counsel for Applicants

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)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' First Set Of Interrogatories To ACORN 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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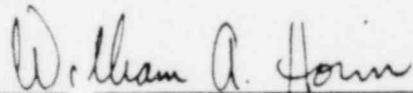
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