



April 23, 1981



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' THIRD 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 Applicants' Third 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 preceding each answer or response.

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Also, please identify the person providing each answer or response. 1/

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 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, CFUR make available for inspection and copying, all documents subject to the requests set forth below.

APPLICANTS' INTERROGATORIES  
AND REQUESTS TO PRODUCE

Contention 3: The computer codes used in CPSES/FSAR must be tested and, if necessary, modified to accept the parameters reflecting the sequence of events at Three Mile Island and then to realistically predict plant behavior.

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1/ The instant discovery requests directed to CFUR concern Contentions 3, 4 and 9. The Board designated CFUR lead party-intervenor for consolidated Contention 4 for all purposes in this proceeding, which includes discovery. CFUR is the sole sponsor of Contentions 3 and 9. Memo-randum and Order, December 31, 1980. If, however, any other Intervenor possesses information or documents requested herein with respect to these contentions which CFUR intends to use in support of its position, such information or documents should be provided in response to these interrogatories and requests to produce.

- 1-3. 2/ What is your basis for Contention 3? Please list all documents not elsewhere identified in your responses to these interrogatories on which you rely with respect to Contention 3. Please provide copies of all such documents for inspection and copying.
- 2-3. Have you prepared any report, study or analysis with respect to Contention 3? 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.
- 3-3. Have you caused others to prepare any report, study or analysis with respect to Contention 3? 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 reply.
- 4-3. Have you had any meetings or contacts with the other intervening parties with respect to Contention 3? If so, please specify the purpose of such meetings or contacts and the results of such meetings or contacts.
- 5-3. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 3? Please identify the purpose of those meetings or contacts, the other persons involved, and the results of such meetings or contacts.
- 6-3. Do you plan to participate in the upcoming hearing with respect to Contention 3? If so, what will be the extent of your participation?
- 7-3. Do you plan to file testimony in the upcoming hearing with respect to Contention 3? 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

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2/ Applicants have identified these interrogatories as the third set to CFUR by the hyphen 3 following each number.

witness. Please provide copies of the 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.

- 8-3. Do you plan to call any witness in the upcoming hearing with respect to Contention 3? 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 3.
- 9-3. If you plan to call any witness in the upcoming hearing with respect to Contention 3, 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 on which the witness intends to rely. Also, identify by title, subject matter, and author, and provide for inspection and copying, any document on which such witness will rely in their testimony with regard to Contention 3.
- 10-3. 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 analyses contained or referenced therein with respect to 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 your objection.
  - c. If your answer to a. is in the affirmative, please specify in what way the information, data or analyses concerning computer codes does not satisfy the concerns raised in Contention 3.
  - d. What are your bases (legal and/or other) for your responses to a. through c.?
- 11-3. Please identify all "computer codes" with which you are concerned in Contention 3. Identify those codes by providing a reference to that code (identify the document and page number), the purpose of the code, and any name or designation applied to the particular code.

- 12-3. For each of the "computer codes" identified in your response to Interrogatory 11-3, specify the manner in which those codes are "used in" the Comanche Peak FSAR.
- 13-3. Describe in detail the tests which you contend must be performed on the computer codes identified in your response to Interrogatory 11-3. Specify who you believe should conduct those tests and what the tests should be designed to discover.
- 14-3. What are the specific criteria by which you contend the computer codes which are the subject of Contention 3 should be judged to determine if it is "necessary" to modify those codes? List every factor which you believe should be included in those criteria and specify which factors or combinations of factors must be met in order for the computer codes to be considered adequate and not required to be modified.
- 15-3. Describe in detail the manner in which you contend each of the computer codes identified in your response to Interrogatory 11-3 should be "modified".
- 16-3. Who do you contend should perform the modification of the computer codes described in your response to Interrogatory 15-3?
- 17-3. What are your bases (legal and/or other) for your responses to Interrogatories 11-3 through 16-3?
- 18-3. Describe what you contend must be done to the computer codes identified in your response to Interrogatory 11-3 so that those computer codes can "accept the parameters" which you contend in Contention 3 should be accepted?
- 19-3. Specify the particular capabilities which you contend the computer codes which are the subject of Contention 3 will have if they are modified in the manner described in your response to Interrogatory 15-3 which capabilities these computer codes do not now have.
- 20-3. Specify each "parameter" which you contend must be reflected in the computer codes which are the subject of Contention 3.
- 21-3. For each "parameter" you list in your response to Interrogatory 20-3, specify the manner in which you contend that parameter would affect the computer codes which are the subject of Contention 3.

- 22-3. For each parameter identified in your response to Interrogatory 20-3, please specify the differences between the way you contend those parameters would affect the Comanche Peak facility and the way in which those parameters affected the Three Mile Island Unit 2 facility.
- 23-3. Identify precisely the "sequence of events at Three Mile Island" which you contend must be reflected in the computer codes which are the subject of Contention 3. In describing this sequence of events, please set forth in detail the initiating events, the reaction of each component to that initiating event and the consequences of those reactions.
- 24-3. Do you contend that the computer codes which are the subject of Contention 3 do not reflect the sequence of events identified in your response to Interrogatory 23-3?
- 25-3. What are your bases (legal and/or other) for your responses to Interrogatories 18-3 through 24-3?
- 26-3. In your previous pleadings you have identified "operator error" as a parameter which must be incorporated into the computer codes which are the subject of Contention 3. Please set forth a description of each such "operator error" and the consequences which you contend flow from that error.
- 27-3. For each "operator error" identified in your response to Interrogatory 26-3, describe the error in a manner which would permit inclusion of such a factor in the computer codes which are the subject of Contention 3, i.e., in mathematical terms.
- 28-3. In your previous pleadings you have identified "maintenance error" as a parameter which you contend should be included in the computer codes for Comanche Peak. Describe each such "maintenance error" which you contend should be considered, and set forth the consequences of each of those errors.

- 29-3. Describe the "maintenance errors" identified in your response to Interrogatory 28-3 in a manner that would permit inclusion of that factor in the computer codes which are the subject of Contention 3, i.e., in mathematical terms.
- 30-3. In your previous pleadings you have identified "hydrogen formation" as a parameter which you contend should be included in the computer codes which are the subject of Contention 3. Describe the specific details of such "hydrogen formation" and the consequences which you contend flow from such "hydrogen formation."
- 31-3. Describe the "hydrogen formation" identified in your response to Interrogatory 30-3 in terms which permit the inclusion of that factor in the computer codes which are the subject of Contention 3, i.e., in mathematical terms.
- 32-3. In your previous pleadings you have identified "single failure criterion interpretation" as a parameter which must be incorporated into the computer codes which are the subject of Contention 3. Please set forth a description of each such "single failure criterion interpretation" and the consequences which you contend flow from that interpretation.
- 33-3. For each "single failure criterion interpretation" identified in your response to Interrogatory 32-3, describe the error in a manner which would permit inclusion of such a factor in the computer codes which are the subject of Contention 3, i.e., in mathematical terms.
- 34-3. In your previous pleadings you have identified "PORV problems" as a parameter which must be incorporated into the computer codes which are the subject of Contention 3. Describe each such "PORV problem" and the consequences which you contend flow from each such problem.
- 35-3. For each "PORV problem" identified in your response to Interrogatory 34-3, describe the problem in a manner which would permit inclusion of such a factor in the computer codes which are the subject of Contention 3, i.e. in mathematical terms.

- 36-3. In your previous pleadings you have identified "misleading indications" as a parameter which must be incorporated into the computer codes which are the subject of Contention 3. Please set forth a description of each such "misleading indication" and the consequences which you contend flow from the indication.
- 37-3. For each "misleading indication" identified in your response to Interrogatory 36-3, describe the indication in a manner which would permit inclusion of such a factor in the computer codes which are the subject of Contention 3, i.e., in mathematical terms.
- 38-3. In your previous pleadings you have identified "non-condenseable gases" as a parameter which must be somehow incorporated into the computer codes which are the subject of Contention 3. Please set forth a description of such "non-condenseable gases" and the consequences which you contend flow from those gases.
- 39-3. For each "non-condenseable gas" identified in your response to Interrogatory 38-3, describe the gas in a manner which would permit inclusion of such a factor in the computer codes which are the subject of Contention 3, i.e., in mathematical terms.
- 40-3. Set forth the specific NRC requirements which you contend require the Applicants to take the measures which you have identified in your responses to each of the above interrogatories.
- 41-3. What do you contend the Applicants must do to demonstrate that the concerns which are the subject of Contention 3 have been adequately dealt with?
- 42-3. What do you contend the NRC Staff must do to demonstrate that the concerns which are the subject of Contention 3 have been adequately dealt with?
- 43-3. What do you contend the computer codes which are the subject of Contention 3 must do to "realistically predict plant behavior"?
- 44-3. What are your bases (legal and/or other) for your responses to Interrogatories 26-3 through 42-3?

Contention 4: Some accident sequences heretofore considered to have probabilities so low as to be considered incredible, based, in part, upon the findings of WASH-1400, are in fact more probable in light of additional findings, such as those of the Lewis Committee and should be evaluated as credible accidents for CPSES. This evaluation should include a hydrogen explosion accident. In order to insure conservatism, the probabilities associated with such accident sequences should be the highest probabilities within the specified confidence band.

- 45-3. What is your basis for Contention 4? Please list all documents not elsewhere identified in your responses to these interrogatories on which you rely with respect to Contention 4. Please provide copies of all such documents for inspection and copying.
- 46-3. Have you prepared any report, study or analysis with respect to Contention 4? 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.
- 47-3. Have you caused others to prepare any report, study or analysis with respect to Contention 4? 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.
- 48-3. Have you had any meetings or contacts with the other intervening parties with respect to Contention 4? If so, please specify the purpose of such meetings or contacts and the results of such meetings or contacts.
- 49-3. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 4? Please identify the purpose of those meetings or contacts, the other persons involved, and the results of such meetings or contacts.
- 50-3. Do you plan to participate in the upcoming hearing with respect to Contention 4? If so, what will be the extent of your participation?

- 51-3. Do you plan to file testimony in the upcoming hearing with respect to Contention 4? 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.
- 52-3. Do you plan to call any witness in the upcoming hearing with respect to Contention 4? 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 4.
- 53-3. If you plan to call any witness in the upcoming hearing with respect to Contention 4, 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 on which the witness intends to rely. Also, identify by title, subject matter, and author, and provide for inspection and copying, any document on which such witness will rely in their testimony with regard to Contention 4?
- 54-3. 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 analyses contained or referenced therein with respect to the evaluation of accident sequences?
  - 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 your objection.
  - c. If your answer to a. is in the affirmative, please specify in what way the information, data or analyses concerning the evaluation of accident sequences does not satisfy the concerns raised in Contention 4.
  - d. What are your bases (legal and/or other) for your responses to a. through c.?

- 55-3. Describe in detail the "accident sequences" which you contend in Contention 4 should be considered "credible accidents" for Comanche Peak. For each such "accident sequence," specify the initiating event, the series of events which follow and the consequences of each accident sequence.
- 56-3 Please describe in detail the type of accident which you contend is a "credible accident" for Comanche Peak.
- 57-3. Identify the specific "findings of WASH-1400" with which Contention 4 is concerned. Identify these particular findings by a brief description and a reference to the page number of WASH-1400 where each is found.
- 58-3. Identify and describe in detail the "additional findings" which render the accident sequences evaluated in WASH-1400 more probable.
- 59-3. Identify the findings of the Lewis Committee which have made the accident sequences which are the subject of Contention 4 "more probable."
- 60-3. Specify the change in "probabilities" which has occurred as a result of these "additional findings."
- 61-3. Precisely what factors do you contend should be considered in determining whether an accident is "credible"?
- 62-3. What is the lowest probability for an accident, i.e., least likely to occur, which should be considered as a "credible" accident at a nuclear power reactor?
- 63-3. What is the lowest probability accident which you contend should be considered as a "credible" accident for Comanche Peak? If your answer to this interrogatory is different from your answer to Interrogatory 62-3, please explain the reason for that difference.
- 64-3. What are your bases (legal and/or other) for your responses to Interrogatories 55-3 through 63-3?

- 65-3. Describe in detail the "hydrogen explosion accident" which you contend should be evaluated?
- 66-3. What are the initiating events which you contend are part of the "hydrogen explosion accident" which must be evaluated?
- 67-3. What amount of hydrogen do you contend would be generated in the "hydrogen explosion accident"?
- 68-3. What is the maximum pressure within the containment which you contend the "hydrogen explosion accident" would generate?
- 69-3. Describe precisely the way in which you contend the hydrogen would burn in the "hydrogen explosion accident."
- 70-3. What are your bases (legal and/or other) for your responses to Interrogatories 65-3 through 69-3?
- 71-3. What is the "conservatism" which you contend must be "insured"?
- 72-3. What do you contend are the probabilities of each of the "accident sequences" which are the subject of Contention 4?
- 73-3. Describe in detail how you calculated the probabilities identified in your response to Interrogatory 72-3.
- 74-3. Describe how you contend the "highest probabilities within the specified confidence band" should be calculated for the accident sequences which are the subject of Contention 4.
- 75-3. Precisely how do you contend the evaluations of the accident sequences which are the subject of Contention 4 should be addressed in the licensing review process for Comanche Peak?
- 76-3. What role do you contend the Applicants should have in performing the evaluation of the accident sequences which are the subject of Contention 4?

- 77-3. What role do you contend the NRC Staff should have in the evaluation of the accident sequences which are the subject of Contention 4?
- 78-3. What role do you contend the Licensing Board should have in the evaluation of the accident sequences which are the subject of Contention 4?
- 79-3. What do you contend the Applicants must do to demonstrate that the evaluations which you contend must be performed have been satisfactorily completed?
- 80-3. What do you contend the NRC Staff must do to demonstrate that the evaluations which you contend should be performed have been satisfactorily completed?
- 81-3. What role do you contend the Licensing Board should do to determine that the accident sequences which are the subject of Contention 4 have been adequately evaluated?
- 82-3. Identify all NRC licensing requirements which you contend are not satisfied by the Applicants in their evaluations of accident sequences.
- 83-3. What are your bases (legal and/or other) for your responses to Interrogatories 71-3 through 82-3?

Contention 9: Applicants have failed to make any effort to determine the effect of radioactive releases on the general public other than at the exclusion boundary. Various transport mechanisms may cause, in certain cases, the bulk of the health effects to occur some distance from the exclusion boundary.

- 84-3. What is your basis for Contention 9? Please list all documents not elsewhere identified in your responses to these interrogatories on which you rely with respect to Contention 9. Please provide copies of all such documents for inspection and copying.
- 85-3. Have you prepared any report, study or analysis with respect to Contention 9? 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.

- 86-3. Have you caused others to prepare any report, study or analysis with respect to Contention 9? 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.
- 87-3. Have you had any meetings or contacts with the other intervening parties with respect to Contention 9? If so, please specify the purpose of such meetings or contacts and the results of such meetings or contacts.
- 88-3. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 9? Please identify the purpose of those meetings or contacts, the other persons involved, and the results of such meetings or contacts.
- 89-3. Do you plan to participate in the upcoming hearing with respect to Contention 9? If so, what will be the extent of your participation?
- 90-3. Do you plan to file testimony in the upcoming hearing with respect to Contention 9? 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.
- 91-3. Do you plan to call any witness in the upcoming hearing with respect to Contention 9? 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 9.
- 92-3. If you plan to call any witness in the upcoming hearing with respect to Contention 9, please specify the nature and scope of that person's testimony. Please state whether that witness

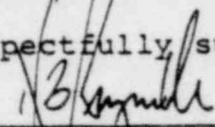
has conducted any research or made any studies on which the witness intends to rely. Also, identify by title, subject matter, and author, and provide for inspection and copying, any document on which such witness will rely in their testimony with regard to Contention 9?

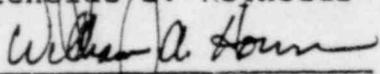
- 93-3. Have you reviewed the Applicants' Final Safety Analysis Report ("FSAR")? If not, please explain. If so, please answer the following:
- a. Do you object to any of the information, data or analyses contained or referenced therein with respect to the effect of radioactive releases on the general public?
  - 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 your objection.
  - c. If your answer to a. is in the affirmative, please specify in what way the information, data or analyses regarding the effect of radioactive releases on the general public does not satisfy the concerns raised in Contention 9.
  - d. What are your bases (legal and/or other) for your responses to a. through c.?
- 94-3. Describe each "effect of radioactive releases" which you contend must be considered in Contention 9.
- 95-3. In your description of each "effect of radioactive releases" identify the radioactive isotopes which you contend are involved in the releases.
- 96-3. Identify the maximum dose which you contend would occur from the radioactive releases which are the subject of Contention 9.
- 97-3. What are the exposure pathways which lead to the effects which are the subject of Contention 9, e.g., ingestion, inhalation or exposure to skin?

- 98-3. Do you contend that the "effects" which are the subject of Contention 9 would be greater than those that would occur at the exclusion boundary?
- 99-3. What do you contend the Applicants must do to "determine" the effects of the radioactive releases which are the subject of Contention 9?
- 100-3. What do you contend the NRC Staff must do to "determine" the effects of radioactive releases which are the subject of Contention 9?
- 101-3. Do you contend that the radioactive releases with which you are concerned in Contention 9 would occur during normal operation of the Comanche Peak facility?
- 102-3. Do you contend that the radioactive releases with which you are concerned in Contention 9 would be the result of an accident at the Comanche Peak facility?
- 103-3. If your answer to Interrogatory 101-3 is in the affirmative, please describe the specific sources of the radioactive releases during normal operation of the Comanche Peak facility with which you are concerned.
- 104-3. If your answer to Interrogatory 102-3 is in the affirmative, describe in detail the type of accident with which you are concerned and the source of the radioactive releases for each of the accidents with which you are concerned.
- 105-3. If your responses to Interrogatories 101-3 and 102-3 are in the negative, please specify the source of the radioactive releases with which you are concerned in Contention 9.
- 106-3. Describe in detail the "various transport mechanisms" with which you are concerned in Contention 9.
- 107-3. Describe in detail the dispersion characteristics of each "transport mechanism" which you described in your response to Interrogatory 106-3. Describe any mathematical models upon which you intend to rely to describe the transport mechanisms.
- 108-3. What do you mean by "certain cases"?
- 109-3. Describe each of the "certain cases" with which you are concerned in Contention 9.

- 110-3. What are the "health effects" with which you are concerned in Contention 9?
- 111-3. Explain what you mean by "the bulk of the health effects."
- 112-3. What is the maximum "distance" from the Comanche Peak facility at which you contend the "health effects" with which you are concerned in Contention 9 should be evaluated?
- 113-3. How did you arrive at the figure which you contend is the maximum "distance" for which "health effects" should be determined?
- 114-3. Describe in detail the scenario which you contend should be addressed which the Applicants have not addressed and which sets forth the mechanisms for release, dispersion and exposure of persons in the manner with which you are concerned in Contention 9.
- 115-3. Do you contend that any of the exposures with which you are concerned in Contention 9 exceed any exposure limits with which the Applicants are required to comply? If so, please identify those exposure limits and describe the extent with which you contend those limits are exceeded.
- 116-3. Please set forth the NRC's licensing requirements which you contend require the Applicants to determine the "effect of radioactive releases" in the manner with which you are concerned in Contention 9.
- 117-3. What are your bases (legal and/or other) for your responses to Interrogatories 93-4 through 116-3?

Respectfully submitted,

  
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Nicholas S. Reynolds

  
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Counsel for Applicants

Date: April 23, 1981

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
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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' Third Set of Interrogatories to CFUR and Requests to Produce" in the above captioned matter were served upon the following persons by deposit in the United States mail, first class postage prepaid this 23rd day of April, 1981:

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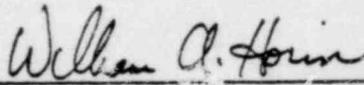
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William A. Horin

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