

(Comanche Peak Steam Electric ) Station, Units 1 and 2) . ) (Application for

. . . .

Operating Licenses)

APPLICANTS' RESPONSE TO CFUR'S FOURTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS

Pursuant to 10 C.F.R. §2.741(d). Texas Utilities Generating Company, et al. ("Applicants") hereby submit their response to the requests for production of documents set forth in the "Fourth Set of Interrogatories to Applicant [sic] and Requests to Produce," served by Citizens for Fair Utility Regulation ("CFUR") on May 13, 1981. Applicants also set forth below the procedures for inspection and copying of the documents requested by CFUR.

# APPLICANTS' RESPONSE TO CFUR'S REQUESTS TO PRODUCE

CFUR's requests to produce are identified by the item number corresponding to the number in CFUR's Fourth Requests to Produce.

11.b. Applicants object to this request for production of documents for the reasons set forth in their response to Interrogatory 10 in Applicants' June 1, 1981 "Answers to CFUR's Fourth Set of Interrogatories."

40.b., Appl 41.b.

47.

Applicants object to these requests for production of documents for the reasons set forth in their response to Interrogatories 39-41 in Applicants' June 1, 1981 "Answers to CFUR's Fourth Set of Interrogatories." Applicants will provide for inspection and copying, pursuant to the procedures set forth below, the following documents:

> Letter from Westinghouse Owners Group to NRC, March 18, 1981, and attachments (previous submittals to the NRC).

48. Applicants object to this request for production of documents for the reasons set forth in their response to Interrogatory 46 in Applicants' June 1, 1981 "Answers to CFUR's Fourth Set of Interrogatories."

## PROCEDURES FOR INSPECTION AND COPYING

CFUR may inspect and copy the documents identified above according to the following procedures:

> The docume its identified above will be available for inspection at the Texas Utilities Generating Company Offices, 18th Floor, 2001 Bryan Tower, Pallas, Texas, during normal business hours (8:00 a.m. to 5:00 p.m., Monday through Friday).

- 2. CFUR should schedule inspection of documents by notifying Homer C. Schmidt, at (214).653-4782, who will arrange for the documents to be inspected.
- 3. CFUR should not remove any documents from the room provided for such inspection. CFUR should identify those documents it wishes to be copied and Applicants will make and supply copies at CFUR's expense and at a rate of 15 conts per page for photocopying.

Respectfully submitted, Nicholas S. Reynolds W111 iam

DEBEVOISE & LIBERMAN 1200 Seventeenth Street, N.W. Washington, D.C. 20036 (202)857-9817

Counsel for Applicants

Juna 17, 1981

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )			
TEXAS UTILITIES GENERATING ) COMPANY, et al.	Docket Nos.	50-445 50-446	

(Comanche Peak Steam Electric ) (Application for Station, Units 1 and 2) ) Operating License)

#### CERTICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Response to CFUR's Fourth Set of Requests for Production of Documents," in the above-captioned matter were served upon the following persons by deposit in the United States mail, first class postage prepaid this 17th day of June, 1981:

Valentine B. Deale, Esq. Chairman, Atomic Safety and Licensing Board 1001 Connecticut Avenue, N.W. Washington, D.C. 20036

Dr. Forrest J. Remick, Member Atomic Safety and Licensing Board 305 E. Hamilton Avenue State College, Pennsylvania 16801

Dr. Richard Cole, Member Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission

Washington, D.C. 20555

Chairman, Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555 Chairman, Atomic Safety and Licensing Appeal Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Marjorie Ulman Rothschild, Esq. Office of the Executive Legal Director U.S. Nuclear Regulatory Commission

Washington, D.C. 20555

David J. Preister, Esq. Assistant Attorney General Environmental Protection Division P.O. Box 12548 Capitol Station Austin, Texas 78711

Mr. Richard L. Fouke CFUR 1568B Carter Drive Arlington. Texas 76010 Arch C. McColl, III, Esq. 701 Commerce Street Suite 302 Dallas, Texas 75202

Jeffery L. Hart, Esq. 4021 Prescott Avenue Dallas, Texas 75219

2

Mrs. Juanita Ellia President, CASE 1415 South Polk Street Dallas, Texas 75224 Dwight H. Moore, Esq. West Texas Legal Services 100 Main Street (Lawyers Bldg.) Fort Worth, Texas 76102

Mr. Chase R. Stephens Docketing & Service Branch U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Them a thin

William A. Horin

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