

08/17/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	}	Docket Nos. 50-445 50-446
TEXAS UTILITIES GENERATING COMPANY, <u>ET AL.</u>		
(Comanche Peak Steam Electric Station, Units 1 and 2)		

NRC STAFF'S THIRD SET OF INTERROGATORIES TO, AND
REQUEST FOR DOCUMENTS FROM, INTERVENOR CASE

The NRC Staff ("Staff") hereby requests that Intervenor CASE, pursuant to 10 CFR §§ 2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce or make available for inspection and copying, all documentary material identified in the responses to interrogatories below. As provided in the "Scheduling Order" issued by the Atomic Safety and Licensing Board ("Licensing Board") on July 23, 1981, these interrogatories relate to information in the Staff's Draft Environmental Statement (DES) which is relevant to allowed contentions. Pursuant to the Licensing Board's Scheduling Order, these interrogatories must be answered by September 11, 1981.

All references provided in response to these interrogatories are to be identified by author, title, date of publication and publisher if the reference is published; if any such reference is not published, it is to be identified by author, title, date it was written, the qualifications

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of the author relevant to this proceeding, and the location where a copy of the document may be obtained.

All persons named in response to these interrogatories are to be identified by name, address, employer, position, education, professional qualifications, and publications related to their views concerning the subject matter of this proceeding.

INTERROGATORIES ON CONTENTION 24

24-11.^{1/} With respect to Contention 24(a):

(a). State whether CASE contends that the Staff's DES (§ 5.9) fails to adequately resolve the issue(s) raised by CASE in Contention 24(a).

(b). If the answer to Interrogatory 24-11(a) is affirmative, state in detail the reasons and basis for CASE's contention.

(c). If the answer to Interrogatory 24-11(a) is affirmative, identify all persons upon whom CASE relies in support of this contention along with a summary of their views or positions relevant to the subject matter of your contention.

^{1/} Since the first and second sets of interrogatories filed by the Staff on January 19, 1981 and March 26, 1981, respectively, covered Contention 24, the numbering of the interrogatories in this third set will begin where the second set of interrogatories ended.

(d). If the answer to Interrogatory 24-11(a) is affirmative, identify all persons whom CASE intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

(e). If the answer to Interrogatory 24-11(a) is affirmative, identify all documentary or other material that CASE intends to use in this proceeding to support this contention and that you intend to offer as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

24-12. With respect to Contention 24(b):

(a) State whether CASE contends that the Staff's DES (§ 5.8.2) fails to adequately resolve the issue(s) raised by CASE in Contention 24(b).

(b). If the answer to Interrogatory 24-12(a) is affirmative, state in detail the reasons and basis for CASE's contention.

(c). If the answer to Interrogatory 24-12(a) is affirmative, identify all persons upon whom CASE relies in support of this contention along with a summary of their views or positions relevant to the subject matter of your contention.

(d). If the answer to Interrogatory 24-12(a) is affirmative, identify all persons whom CASE intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

(e) If the answer to Interrogatory 24-12(a) is affirmative, identify all documentary or other material that CASE intends to use in this proceeding to support this contention and that you intend to offer as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

24-13. With respect to Contention 24(c):

(a) State whether CASE contends that the Staff's DES (§ 2) fails to adequately resolve the issue(s) raised by CASE in Contention 24(c).

(b). If the answer to Interrogatory 24-13(a) is affirmative, state in detail the reasons and basis for CASE's contention.

(c). If the answer to Interrogatory 24-13(a) is affirmative, identify all persons upon whom CASE relies in support of this contention along with a summary of their views or positions relevant to the subject matter of your contention.

(d). If the answer to Interrogatory 24-13(a) is affirmative, identify all persons whom CASE intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

(e) If the answer to Interrogatory 24-13(a) is affirmative, identify all documentary or other material that CASE intends to use in this proceeding to support this contention and that you intend to offer

as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

24-14. With respect to Contention 24(d):

(a) State whether CASE contends that the Staff's DES (§ 5.8.3.6) fails to adequately resolve the issue(s) raised by CASE in Contention 24(d).

(b). If the answer to Interrogatory 24-14(a) is affirmative, state in detail the reasons and basis for CASE's contention.

(c). If the answer to Interrogatory 24-14(a) is affirmative, identify all persons upon whom CASE relies in support of this contention along with a summary of their views or positions relevant to the subject matter of your contention.

(d). If the answer to Interrogatory 24-14(a) is affirmative, identify all persons whom CASE intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

(e) If the answer to Interrogatory 24-14(a) is affirmative, identify all documentary or other material that CASE intends to use in this proceeding to support this contention and that you intend to offer

as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

Respectfully submitted,

Marjorie Ulman Rothschild

Marjorie Ulman Rothschild
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 17th day of August, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

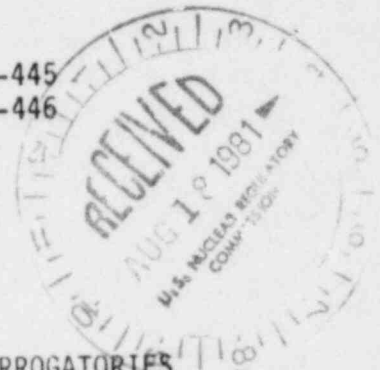
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

TEXAS UTILITIES GENERATING COMPANY, ET AL.

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

Docket Nos. 50-445
50-446



CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S THIRD SET OF INTERROGATORIES TO, AND REQUEST FOR DOCUMENTS FROM, INTERVENOR CFUR" and "NRC STAFF'S THIRD SET OF INTERROGATORIES TO, AND REQUEST FOR DOCUMENTS FROM, INTERVENOR CASE" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, or as indicated by a double asterisk, by hand delivery, or as indicated by a triple asterisk, by express mail, this 17th day of August, 1981:

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Panel (5)*
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