

RELATED CORRESPONDENCE

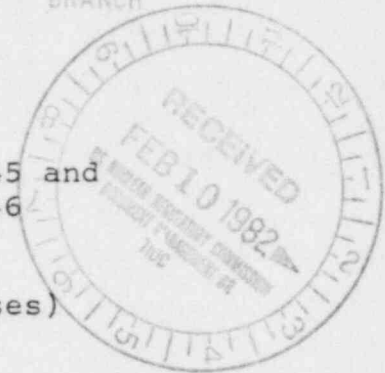
February 8, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'82 FEB -9 A10:27

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
MARKETING & SERVICE
BRANCH



In the matter of)	
)	
TEXAS UTILITIES GENERATING)	Docket Nos. 50-445 and
COMPANY, <u>et al.</u>)	50-446
)	
(Comanche Peak Steam Electric)	(Application for
Station, Units 1 and 2))	Operating Licenses)

APPLICANTS' RESPONSE TO CASE'S SIXTH SET OF
REQUESTS FOR PRODUCTION OF DOCUMENTS AND CLARIFICATION
OF RESPONSES TO CERTAIN INTERROGATORIES

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 "CASE's Sixth Set of Interrogatories to Appli-
cants and Requests to Produce," served on January 4, 1982.
The procedures for inspection and copying of the documents
requested by CASE are as set forth in Applicants' March 4,
1981 response to CASE's Fourth Set. Applicants' responses
take into account CASE's clarification of certain requests
provided by telephone on February 4, 1982. In addition,
pursuant to a request made by CASE in a telephone call to
Applicants on February 1, 1982, Applicants clarify responses
to certain of the Interrogatories in CASE's Sixth Set.

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APPLICANTS' RESPONSE TO CASE'S
REQUESTS TO PRODUCE

CASE's requests to produce are indentified by the item number corresponding to the number in CASE's Sixth Set of Requests to Produce.

- 1.d. Applicants will provide for inspection and copying the following documents:

Letter from ASME to R.J. Vurpillat, Brown & Root, Inc., dated November 23, 1981.

Letter from ASME to R.J. Vurpillat, Brown & Root, Inc., dated November 25, 1981.

Applicants note that a reinspection was conducted on January 18-22, 1982. A recommendation concerning renewal of the certificates will be considered by the ASME Accreditation Subcommittee in early March. Applicants believe that renewal of the certificates will be approved at that time.

- 2.c., f
and g These documents are contained in the Corporate Quality Procedures/Instructions Manual which is being supplied in response to item 7.e. (23).

- 2.k. As described in our response to Interrogatory 2.j., Applicants do not conduct audits only for the purpose of detecting trends. However, as described in the response to item 6 below, Applicants are providing the site activity audits concerning Brown & Root. In addition, Applicants will provide all other site activity audits concerning design and construction.

6. The eight (8) audits of the Brown & Root organization conducted through February, 1978, have already been made available. In addition, Applicants will provide for inspection and copying site activity audits concerning Brown & Root performed since February 1978.

- 7.d. Applicants will produce concrete pour cards associated with Contention 7 and made available to CFUR.
- 7.e. Applicants will provide for inspection and copying the following documents:
- (1), (2), (3), (4), (19), (22) and (23)

Updated versions, if any, of each of the documents previously produced will be made available for inspection and copying. With respect to previous versions of QA/QC manuals, specific revisions will be produced upon request.

Also, with respect to item (4), the TUGCO Quality Assurance Division has begun to issue CAR's. A copy of that log will be made available for inspection and copying.

APPLICANTS' CLARIFICATION OF
RESPONSES TO CASE'S INTERROGATORIES

On February 1, 1982 CASE telephoned Applicants to request clarification of certain of the responses provided to CASE's Sixth Set of Interrogatories. Specifically, CASE had questions regarding Interrogatories 2.d. and 2.e., 2.h. and 2.i., and 3. CASE also had a general request that Applicants identify "the person providing each answer or response." In response, Applicants provide the following information:

Interrogatories 2.d. and 2.e.

These Interrogatories concern procedures for documentation and review by management of audit results. Applicants provided the appropriate procedure numbers. CASE asked that Applicants clarify their response. Applicants hereby clarify their response, as follows:

The numbers identify procedures contained in the Corporate Quality Procedures/Instructions Manual provided in response to Item 7.e. (23).

Interrogatories 2.h. and 2.i.

These Interrogatories concern NRC Staff audits to detect trends. Applicants responded that the NRC Staff conducted audits according to their own procedures and thus the question is best directed to the NRC. CASE is concerned that Applicants response does not make it sufficiently clear that the information can only be obtained from the Staff. (See 10 C.F.R. § 2.720(h)(2)(ii)).

Applicants believe that their original response was proper.

Interrogatory 3.

This Interrogatory requested copies of Applicants' responses to NRC I & E Reports. Applicants responded that these documents are available in the local public document room ("PDR"). In its phone conversation with Applicants, CASE indicated that it was concerned that as hearings on Contention 5 approached it would not be able to obtain Applicants' responses in a timely manner because of delays in documents reaching the PDR. Applicants respond, as follows:

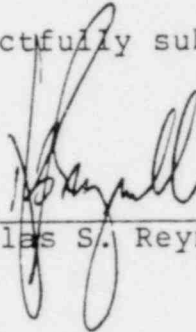
Applicants will discuss with CASE arrangements to make available responses to NRC I & E Reports which are relevant to Contention 5 when it becomes clear that CASE is unable to obtain Applicants' responses from the PDR in a timely manner.

General

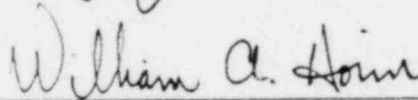
CASE requested that Applicants identify the person providing each answer or response to CASE's interrogatories. Applicants respond, as follows:

Each answer was prepared by or under the direct supervision of David N. Chapman, Manager, Quality Assurance, Texas Utilities Generating Company.

Respectfully submitted,



Nicholas S. Reynolds



William A. Horin

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

Counsel for Applicants

February 8, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)
)
TEXAS UTILITIES GENERATING) Docket Nos. 50-445
COMPANY, et al.) 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' Response to CASE's Sixth Set of Requests For
Production of Documents and Clarification of Responses
to Certain Interrogatories," in the above-captioned matter
were served upon the following persons by overnight
delivery (*), or by deposit in the United States mail,
first class postage prepaid this 8th day of February 1982:

Marshall E. Miller, Esq.
Chairman, Atomic Safety and
Licensing Board
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

Dr. Kenneth A. McCollom
Dean, Division of Engineering
Architecture and Technology
Oklahoma State University
Stillwater, Oklahoma 74074

Marjorie Ulman Rothschild, Esq.
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Richard Cole, Member
Atomic Safety and Licensing
Board
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

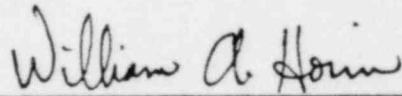
Chairman, Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

J. Marshall Gilmore, Esq.
1060 W. Pipeline Road
Hurst, Texas 76053

Mr. Richard Fouke
1669-B Carter Drive
Arlington, Texas 76010

*Mrs. Juanita Ellis
President, CASE
1426 South Polk Street
Dallas, Texas 75224

Mr. Chase R. Stephens
Docketing & Service Branch
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20005



William A. Horin

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