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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of

APPLICATION OF TEXAS UTILITIES
GENERATING COMPANY, ET AL. FOR
AN OPERATING LICENSE FOR
COMANCHE PEAK STEAM ELECTRIC
STATION UNITS #1 AND #2
(CPSSES)

Docket Nos. 50-445
and 50-446

CASE'S THIRD SET OF INTERROGATORIES
AND REQUESTS TO PRODUCE TO NRC STAFF

Pursuant to 2.720(h)(2)(ii), CASE herewith files its Third Set of Interrogatories and Requests to Produce to NRC Staff. In accordance with the Board's instructions to attempt to work out answers informally, we are not at this time filing with the presiding officer a request for a finding that answers to the interrogatories are necessary to a proper decision in the proceeding and that answers to the interrogatories are not reasonably obtainable from any other source or a request that the presiding officer require the Staff to answer the interrogatories. We hope that the NRC Staff will be cooperative and that such an action will not be necessary. We ask that the Staff reply expeditiously, by express mail.

Please answer the following interrogatories in the manner set forth herewith. Each interrogatory should be answered fully in writing, under oath or affirmation, and include all pertinent information known to the NRC Staff as well as any pertinent information known to their advisors or counsel. Please identify the person providing each answer or response.

Each request to produce applies to pertinent documents which are in the possession, custody or control of the NRC Staff, its officers, directors or employees as well as its advisors or counsel. If the Staff is aware of any pertinent documents not in its possession but which are relevant to the issues at hand, please

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identify such documents. The term "documents" shall include any writings, drawings, graphs, charts, photographs, reports, studies, and other data compilations from which information can be obtained.

As with all interrogatories and requests to produce, these shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the directives of the Board. Because of the time restrictions under which we are presently operating, we request that supplementation be made on an expedited basis.

STATEMENT OF 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 CFR 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 CFR 50.57(a) necessary for issuance of an operating license for Comanche Peak.¹

Until stated otherwise, the following questions have to do with the documents CASE was handed by NRC Staff Counsel Ms. Rothschild following the NRC Caseload Forecast Panel meeting in Arlington, Texas, 4/13/82: Trend Analysis.

1. It is not clear from the documents we received exactly who supplied the information requested by Mr. Crossman in each of his annual requests. (We have attached a copy of the Trend Analyses as Attachment A to our 4/20/82 Motion for Additional Time for Discovery on Contention 5, being filed this same day. The page numbers we will refer to in our interrogatories refer to those Attachment pages as numbered in the Attachment to that pleading.)
Please identify the individual who supplied the information requested by Mr. Crossman for CPSES for each of the years 1976, 1977, 1978, and 1979.
2. Does the NRC Staff plan to have such individual(s) testify in the upcoming hearings in these proceedings? Please answer for each individual.
3. If the answer is no for any of the above-referenced individual(s), will the Staff agree to voluntarily make such individual(s) available to testify

¹ In its 10/31/80 rulings, the Board construed Contention 5 to cover the Inspection and Enforcement Reports identified by ACORN in its Offer of Proof of August 13, 1980.

and be cross-examined in the hearings?

4. Please have the following questions answered by the individual who supplied the information requested by Mr. Crossman in his January 14, 1977 memorandum, re: Trend Analysis - 1976 (CASE Attachment A - Pages 2 and 3):

a. Is the Principal Inspector, referred to on CASE Attachment A - Page 5, item c, the same as the individual who supplied the information requested by Mr. Crossman in his January 14, 1977 Memorandum?

b. If the answer to a. is no, please provide the name of the Principal Inspector referred to.

c. On CASE Attachment A - Page 5, item c, it is stated: "...the Principal Inspector has, within the past year, requested additional information in order to clarify corrective action taken in order to preclude recurrences."

Please identify the specific instances where additional information was requested, give a brief summary of the matters involved, the action taken by Applicants and NRC, any I&E Reports involved, and any other documents involved such as Corrective Action Requests, Deficiency and Disposition Requests, etc.

d. Supply for inspection and copying all documents dealing with your answer to item c. preceding. (On this and all other requests for documents, if they are readily available from the Public Document Room or from the Applicants' records, please identify the documents by name and number so that we'll know what to ask for.) Include in your answer all informal notes, handwritten memos, internal memoranda, etc. dealing with your answer to item c. preceding.

e. On CASE Attachment A - Page 5, item c, it is stated: "An improvement has been evident; however, an adequate level of confidence has not been fully achieved."

Has an adequate level of confidence ever been fully achieved, and is there presently an adequate level of confidence? If the answer to either part of this question is yes, please give a brief description of how things have changed, what specific steps Applicants have taken to achieve this adequate level of confidence, and when the level of confidence reached an adequate level.

f. If the answer to e. above is no, please provide specific details of the specific areas in which you believe improvement is still needed.

g. On CASE Attachment A - Page 5, items e, f & g., it is stated:

"During the early part of 1976, it became apparent to the Principal Inspector that the effectiveness of the licensee's QA/QC Program was in a state of degradation as a result of a domineering and overpowering control by the contractor's site construction management.

"On June 11, 1976, at the request of the Region IV staff, the President of TUGCO/TUSI, two Senior Vice Presidents and the QA Manager met in

4.g. (continued):

conference at the WPC regional office in order to alert top management of the seriousness of the apparent breakdown in corporate management. ...Recent site inspections have revealed signs of a slow, but progressive, turn-around to a more effectual management control by the licensee; however, the matter remains an item of priority until a more satisfactory condition is demonstrated by the licensee..."

(1) Please explain in detail what is meant by "state of degradation", "a domineering and overpowering control by the contractor's site construction management," and "apparent breakdown in corporate management."

(2) Is the "contractor's site construction management" referred to Brown and Root construction management?

(3) Please give specific details of what has transpired to reveal signs "of a slow, but progressive, turn-around to a more effectual management control by the licensee." Include what specific actions have been taken by the licensee to effect this turn-around.

h. Provide for inspection and copying all documents, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information having to do with:

- (1) the preparation of this Trend Analysis - 1976; and
- (2) the conclusions in this Trend Analysis - 1976.

i. If for any reason any of the questions in 4. are not answered by the individual who supplied the information requested by Mr. Crossman in his January 14, 1977 memorandum, please advise why and have the questions answered by Mr. Crossman.

5. Please have the following questions answered by the individual who supplied the information requested by Mr. Crossman in his January 6, 1978 memorandum, re: Trend Analysis - 1977 (CASE ATTACHMENT A - Pages 7 and 8):

a. On CASE Attachment A - Page 9, item f, it is stated: "The contractors QA/QC Program is considered to be 'too wieldy' in its structure and is undergoing progressive change (assume should be change) by the licensee. A significant organization and management change initiated January 3, 1978, should improve overall QA/QC Program effectiveness"

(1) Please explain in more detail what is meant by "'too wieldy' in its structure."

(2) Please give specific details of the progressive change by the licensee which the contractors QA/QC Program is undergoing. Include what specific actions have been taken by the licensee during 1977 in this regard.

5. (continued):

b. Provide for inspection and copying all documents, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information having to do with:

- (1) the preparation of this Trend Analysis - 1977; and
- (2) the conclusions in this Trend Analysis - 1977.

c. If for any reason any of the questions in 5. are not answered by the individual who supplied the information requested by Mr. Crossman in his January 6, 1978 memorandum, re: Trend Analysis - 1978, please advise why and have the questions answered by Mr. Crossman.

6. Did Mr. Crossman write a memorandum (such as those for 1976, 1977, and 1979, CASE Attachment A - pages 2 and 3, 7 and 8, and 19 and 20) to the Facilities Inspectors for 1978?

7. Please have the following questions answered by the individual who supplied the information re: Trend Analysis - 1978 (CASE Attachment A - Pages 14 through 17):

a. On CASE Attachment A - Page 14, item a, it is stated: "The licensee reported a total of six potential construction deficiencies (50.55(e)) items during calendar year 1978."

Please provide details regarding these deficiencies: a brief description of each, the resolution of the problem, and if available, the Applicants' NCR (Nonconformance Report) number.

b. On CASE Attachment A - Page 14, item c.(2), it is stated: "...we have had to ask for additional information on two occasions. Inadequacies were for failure to provide a definitive commitment for action to prevent repetition."

Please identify the specific instances where additional information was requested, give a brief summary of the matters involved, the action taken by Applicants and NRC, any I&E Reports involved, and any other documents involved such as Corrective Action Requests, Deficiency and Disposition Requests, Nonconformance Reports, etc.

c. On CASE Attachment A - Page 14, item d.(1), it is stated: "Unresolved items have generally been cleared within one or two additional inspections although some items have taken several months. These are generally as a result of being unable to locate W documentation on site. Also note that CDNs are usually carried in the reports as unresolved items for tracking purposes."

(1) Please explain what "CDN" stands for and what the term means.

(2) Please identify the specific items which have taken several months to clear, give a brief summary of the matters involved, the action taken by Applicants and NRC, any I&E Reports involved, and any other documents involved such as Corrective Action Requests, Deficiency and Disposition Requests, Nonconformance Reports, etc.

7.c. (continued):

- (3) Please explain what is meant by the statement that "CDNs are usually carried in the reports as unresolved items for tracking purposes."
 - (4) Are we correct in our assumption that W refers to Westinghouse?
(If not, please explain.)
- d. Please explain the procedure by which unresolved items are converted to enforcement items (as this terminology was used on CASE Attachment A - Page 14, item d.(3)). Who makes the determination as to whether or not unresolved items are converted to enforcement items?
- e. On CASE Attachment A - Page 15, item f, it is stated: "The licensee's QA/QC program is generally effective in my opinion. It is somewhat encumbered by too many procedures and occasionally by not having enough real talent to do the job correctly. Instances of the latter seem rare and do show up occasionally in invalid NCRs which in turn reflect that the inspectors don't really know what they are inspecting. In my particular situation, if I believed that they were more than just a little ineffective, I would be forced to attack the situation head-on."
- (1) Please explain in detail what is meant by "not having enough real talent to do the job correctly."
 - (2) Please provide specific details of "instances" of "not having enough real talent to do the job correctly" showing up "in invalid NCRs which in turn reflect that the inspectors don't really know what they are inspecting."
 - (3) Please provide the names of all "inspectors" who "don't really know what they are inspecting."
 - (4) Please explain in detail what is meant by the statement "In my particular situation, if I believed that they were more than just a little ineffective, I would be forced to attack the situation head-on." By "they" are you referring to the inspectors who don't really know what they are inspecting? What is meant by "just a little ineffective"? What specific actions would you take if you were "forced to attack the situation head-on"? What would it take for you to be "forced to attack the situation head-on"?
- f. Provide for inspection and copying all documents, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information having to do with:
- (1) the preparation of this Trend Analysis - 1978; and
 - (2) the conclusions in this Trend Analysis - 1978.
- g. If for any reason any of the questions in 7 are not answered by the individual who supplied the information on CASE Attachment A - Pages 14 through 17, please advise why and have the questions answered by Mr. Crossman.

8. Please have the following questions answered by the individual who supplied the information requested by Mr. Crossman in his January 17, 1980 memorandum, re: Trend Analysis - 1979 (CASE Attachment A - Pages 19 and 20):

a. On CASE Attachment A - Page 21, item a, it is stated: "Two items were officially categorized by the licensee as 50.55(e) items."

Please provide details regarding these items: a brief description of each, the resolution of the problem, and if available, the Applicants' NCR (Nonconformance Report) number.

b. On CASE Attachment A - Page 21, item c.(3), it is stated: "Any unsatisfactory answers given are not usually the licensee's fault, but also not necessarily our fault either in terms of the way the noncompliance is written. It is primarily a matter of our wanting something a bit stronger for the record."

(1) Please explain what is meant by the statement "but also not necessarily our fault either in terms of the way the noncompliance is written."

(2) Please explain what is meant by "wanting something a bit stronger for the record."

c. On CASE Attachment A - Page 22, item f, it is stated: "Thus the driving force behind my request for a special engineering audit of site operations."

(1) Who would have made such a special engineering audit of site operations?

(2) Was such a special engineering audit of site operations ever made?

(3) If the answer to (2) is yes, describe briefly the procedure, the results, and other details of such special engineering audit.

(4) If the answer to (2) is no, please describe briefly the procedure you went through to get such a special engineering audit made, who you addressed your initial request to, who participated in the decision not to make such audit, and any other details regarding such decision.

(5) Whether the answer to (2) is yes or no, provide for inspection and copying all documents dealing with this matter, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information, including the special engineering audit itself if one was made.

d. On CASE Attachment A - Page 22, item f, bottom paragraph, it is stated: "In a couple of cases, I have been able to show them that their people are essentially incompetent even though they had been through the site training and had been certified as competent."

(1) By show "them" that "their" people, specifically to whom are you referring? the licensee? Brown & Root? ??

(2) By even though "they" had been through the site training and had been certified as competent, are you referring to the line inspectors

8.d. (continued):

(2) continued:

who were essentially incompetent even though they had been through the site training and had been certified as competent?
(If not, specify to whom you are referring.)

- (3) Provide the names of the people you showed to be essentially incompetent even though they had been through the site training and had been certified as competent.
 - (4) What action did Applicants take when you showed that their people were essentially incompetent even though they had been through the site training and had been certified as competent? (For example: Did Applicants take any disciplinary action regarding this? Did they institute new procedures for training of such people? Or what specific actions did they take?)
 - (5) To your knowledge, are the people referenced in (3) preceding still working at CPSES?
 - (6) If the answer to (5) or any part of (5) is yes, are such people still working in the same capacity?
 - (7) If the answer to (5) or any part of (5) is no, please provide the details of their termination if you are aware of such details. If you are not aware of such details, please so state.
 - (8) Provide details regarding each instance where you showed their people to be essentially incompetent even though they had been through the site training and had been certified as competent.
 - (9) Provide for inspection and copying all documents dealing with this matter, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information.
- e. On CASE Attachment A - Page 22, item f, bottom paragraph, it is stated: "I see a desire on the part of the licensee to turn this situation around in the important areas of electrical and piping installation."
- (1) What specific actions of the licensee have indicated this desire on their part to "turn this situation around"?
 - (2) Did your statement also indicate that you had not detected a desire on the part of the licensee to turn the situation around in other areas (besides electrical and piping installation)? Please give specifics (i.e., if your answer is no, why did you choose the particular wording you did? what specific actions of the licensee have indicated the desire on their part to turn the situation around in other areas? etc.)
 - (3) Provide for inspection and copying all documents dealing with this matter, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information.

8. (continued):

- f. On CASE Attachment A - Page 22, item f, bottom paragraph, it is stated:
"...too often an installation clearly accomplished other than as originally designed and buildable has been approved by the licensee's on-site engineering arm as fulfilling requirements. In effect, the engineer has approved a nonconforming installation in advance of QC being called. QC is then signing for the as-built condition and the underlying problem is not addressed."
- (1) Does the NRC approve of this procedure?
 - (2) If the answer to (1) above is no, what specific steps has the NRC taken to keep this from happening?
 - (3) What specific authority does the NRC have (and do you, or did you in your capacity at the time, have) to keep this from happening?
 - (4) Site specific instances when this has happened. Please give specifics in enough detail so that we can investigate them further through interrogatories to Applicants. Please also include any NCR numbers, I&E Reports, etc. of which you know.
 - (5) Provide for inspection and copying all documents dealing with this matter, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information.
- g. On CASE Attachment A - Page 23, first paragraph, it is stated: "I'm not at all sure that what CPSES is doing in this area is very different than what other utilities and/or engineers have done on other projects but I don't like it. I believe that much the same thing went on in Bechtel at ANO-2, but it wasn't as obvious nor was I there as much."
- (1) Please give the basis for your first sentence (legal and/or other basis).
 - (2) Please identify exactly what is meant by "in Bechtel at ANO-2".
 - (3) Please provide for inspection and copying all documents dealing with this matter, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information.
- h. On CASE Attachment A - Page 23, item g, it is stated: "Any Other Trends Indicative of Poor Performance - I don't see any other problem not discussed above except possibly a future development in the public relations arena. It seems likely to me that the licensee will use his full powers to be less open with us in the area of identified construction deficiencies than he has in the past. I think he will take maximum advantage of part 50.55(e) and the guidance to go through the necessary formalities but avoid, if at all possible, having to report to us. It is, of course, premature to really get into this arena until we prove a case."

8.h. (continued):

- (1) Please explain the use of the wording "in the public relations arena." (i.e., it appears to CASE that this is rather mild language for the type of actions which you appear to expect on the part of Applicants, as expressed in the sentences which follow your statement.) Do you not see this as much more significant than a "public relations" matter?
- (2) Was a case ever proved, as you indicated in your last sentence?
- (3) What specific actions were taken by the NRC to attempt to "prove a case" in this regard?
- (4) Has it been your experience since the time this 1979 Trend Analysis was written that your expectations as expressed in item g have been borne out by Applicants' actions?
- (5) If the answer to (4) is no, please specify what actions you took to ascertain whether Applicants were indeed taking maximum advantage of part 50.55(e) and the guidance to go through the necessary formalities but avoid, if at all possible, having to resort to you.
- (6) If the answer to (4) is yes, please provide details as to specific instances where this has taken place.
- (7) Please identify specifically what you mean by "the guidance."
- (8) Provide for inspection and copying all documents dealing with this matter, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information.
 - i. Provide for inspection and copying all documents, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information having to do with:
 - (1) the preparation of this Trend Analysis - 1979; and
 - (2) the conclusions in this Trend Analysis - 1979.
 - j. If for any reason any of the questions in 8 are not answered by the individual who supplied the information requested by Mr. Crossman in his January 17, 1980 memorandum, please advise why and have the questions answered by Mr. Crossman.

(NOTE: If at all possible, we want the questions answered by the parties indicated; however, it had occurred to us that it might be impossible, for instance if the person was no longer employed and could not be found. This is why we asked that Mr. Crossman answer if such a case.)

9. Please identify what the abbreviations in the headings on CASE Attachment A - Pages 4, 11, 16 and 17, and 24 and 25 stand for, and give a brief description of the meaning of the information in each of the columns. Please also supply the same information about any abbreviations in any of the items in the columns.
10. The information in the Trend Analyses reports does not seem to be complete

10. (continued):

(i.e., there is no indication as to who prepared the answers to Mr. Crossman's requests, there is no cover letter from Mr. Crossman to the inspectors for 1978, etc.). Please provide for inspection and copying the entire original documents regarding the Trend Analyses for 1976, 1977, 1978, and 1979, including all informal notes, handwritter memos, internal memoranda, and any other pertinent information.

11. Has there been any kind of trending or trend analysis done by the NRC Region IV office or anyone at the NRC Region IV office or anyone else on the NRC Staff for CPSES prior to 1976.
12. If the answer to 11. is yes, please provide for inspection and copying the entire original documents regarding such trending or trend analyses, including all informal notes, handwritten memos, internal memoranda, and any other pertinent information.
13. When Ms. Rothschild, NRC Staff Counsel, handed the writer the Trend Analyses for 1976, 1977, 1978, and 1979, she stated that she had not known about their existence earlier. Provide the name of the individual at the Region IV office who told Ms. Rothschild that these documents do, in fact, exist.
14. Does the NRC Staff plan to have the individual identified in the answer to 13 preceding testify in the upcoming hearings?
15. Will the Staff agree to voluntarily make such individual available to testify and be cross-examined in the hearings?
16. In Mr. Crossman's January 14, 1977 memorandum re: Trend Analysis - 1976 (CASE Attachment A - Page 2), he states regarding item a. Number and Repetiveness of Construction Deficiency Reports: "(I have this information already)."

Please include this information in the documents requested in Question 10 preceding.

(END OF QUESTIONS SPECIFICALLY TO DO WITH THE DOCUMENTS CASE WAS HANDLED BY NRC STAFF COUNSEL MS. ROTHSCHILD FOLLOWING THE NRC CASELOAD FORECAST PANEL MEETING 4/13/82: TREND ANALYSIS.)

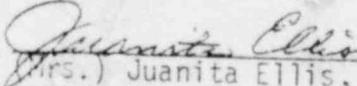
17. Does the NRC have a procedure set up whereby they regularly review Applicants' records, such as Nonconformance Report logs or Nonconformance Reports, or similar documents, to make sure that they are reporting everything to the NRC which should be reported under 10 CFR 50.55(e)?
18. If the answer to 17 is yes, please briefly describe such procedure and how it works, how often it is done, etc.
19. Provide for inspection and copying all written procedures referenced in 17 above.

20. Has the NRC Staff received and reviewed the Lobbin Report ("Final Report, Review of the Quality Assurance Program for the Design and Construction of the Comanche Peak Steam Electric Station, Prepared for the Texas Utilities Generating Company, by F. B. Lobbin Consulting Engineer, R-82-01, February 4, 1982, Columbia, Maryland)?
21. If the answer to 20. is yes, who specifically within the NRC has reviewed this document?
22. Will the individual(s) referenced in 21 testify for the NRC Staff in the upcoming hearings?
23. Will the Staff agree to voluntarily make the individual(s) referenced in 21 available to testify and be cross-examined in the hearings?
24. Does the NRC Staff have some sort of record which is kept of open items on a continuous basis, including the history of the open item and the final resolution of it (other than the I&E Reports themselves)?
25. If the answer to 24 is yes, please provide for inspection and copying all such records.
26. Please briefly explain the current levels of violations being used by the NRC Staff when writing up violations on Applicants, and provide a brief comparison between what is currently being used and what was used in the past.
27. When investigations are made by the NRC, what is the promise of confidentiality given to the people who make allegations or point out problems?
28. With further reference to 27, does the promise of confidentiality extend to hearings?
29. It is our understanding that the Region IV office has recently made an investigation into certain pumps which had been supplied by Hayward Tyler Pump Company of Burlington, Vermont. It is also our understanding that some of these pumps had been ordered for the Comanche Peak plant.

Is the information in the above correct? If not, please state specifically in what respect it is incorrect.
30. Provide for inspection and copying all original documents dealing with all pumps ordered for Comanche Peak from Hayward Tyler Pump Company, including documents dealing with inspections of any or all pumps ordered, all NRC reports on the subject of Hayward Tyler pumps, congressional investigations regarding Hayward Tyler pumps, handwritten notes, internal memoranda, and any other pertinent information known to the NRC. Include in your response all documents regarding the investigation by the NRC of this matter, not just for Comanche Peak but the entire investigation.
31. If there is any other information regarding Hayward Tyler Pump Company's pumps which were or were suspected of being defective of which the NRC is aware but which you do not have in your possession, please advise what this information is and where we can obtain it.

32. With reference to the NRC Caseload Forecast Panel's meeting 4/13/82 at the NRC Region IV offices in Arlington, Texas, and the plant tour the Panel took 4/14/82 and 4/15/82, please provide the following information:
- a. What specific areas on the plant tour did the Panel view?
 - b. Of the specific areas referenced in a. preceding, which of them does the Panel consider to be problem areas?
 - c. Which documents (including hand-written notes, internal memoranda, etc.) did the Panel view on 4/14/82 and 4/15/82?
 - d. Supply for inspection and copying all documents (including hand-written notes, internal memoranda, charts, graphs, etc.) given to, made by, or used by the Panel either during the plant tour or in their deliberations before or after the plant tour regarding their assessment of the construction completion schedule and fuel load dates for CPSES Units 1 and 2. Supply the original documents for inspection.
 - e. When is the Panel expected to make its findings public?
 - f. Why didn't the Panel announce its findings immediately following the tour of the plant site, as they did in October 1980, the last time they made a trip to CPSES?
 - g. Provide the names of the specific individuals, other than those who attended the 4/13/82 meeting as panel members, who will be involved in making a determination regarding the Panel's estimated construction completion date and fuel load date for CPSES Units 1 and 2. Include their titles in your answer, as well as their location.
 - h. Please have the following questions answered by each of the members of the Panel; please indicate who is supplying each answer:
 - (1) Do you have an opinion, based on the information you have reviewed and what you have seen at the plant site, when construction will be completed for CPSES Unit 1? Unit 2?
 - (2) If the answer to (1) is yes, please provide your estimated dates.
 - i. As soon as the Panel has made its decision, please supply CASE with a copy of it by express mail.

Respectfully submitted,



(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound Energy)
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Dallas, Texas 75224
214/946-9446
214/941-1211, work, part-time

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
APPLICATION OF TEXAS UTILITIES
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UNITS #1 AND #2 (CPSSES)

X
X
X
X
X
X

Docket Nos. 50-445
and 50-446

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of CASE's Third Set of Interrogatories and Requests to Produce to NRC Staff

have been sent to the names listed below this 20th day of April 1982, by: Express Mail where indicated by * and by first class mail elsewhere.

- * Administrative Judge Marshall E. Miller
U. S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board Panel
Washington, D. C. 20555
- David J. Preister, Esq.
Assistant Attorney General
Environmental Protection Division
P. O. Box 12548, Capitol Station
Austin, TX 78711
- * Dr. Kenneth A. McCollom, Dean
Division of Engineering, Architecture,
and Technology
Oklahoma State University
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- * Dr. Richard Cole, Member
Atomic Safety and Licensing Board
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- * Nicholas S. Reynolds, Esq.
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U. S. Nuclear Regulatory Commission
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- * Marjorie Ulman Rothschild, Esq.
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U. S. Nuclear Regulatory Commission
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Office of the Secretary
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(Mrs.) Juanita Ellis, President
CASE (CITIZENS ASSOCIATION FOR SOUND ENERGY)