

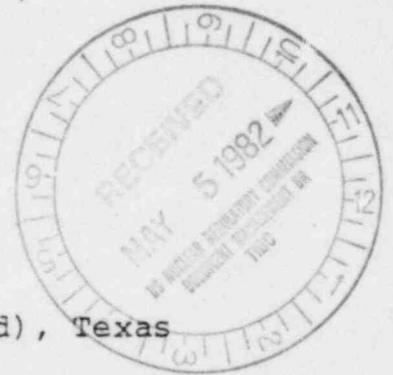
May 3, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '82 MAY -4 11:20

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|-------------------------------|---|----------------------------|
| 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 Operating |
| Station, Units 1 and 2) |) | Licenses) |

APPLICANTS' RESPONSES TO CASE'S
TENTH SET OF INTERROGATORIES
AND REQUESTS TO PRODUCE



Pursuant to 10 C.F.R. §§ 2.740b(b) and 2.741(d), Texas Utilities Generating Co., et al. ("Applicants") hereby submit their responses to "CASE's Tenth Set of Interrogatories to Applicants and Requests To Produce," served April 20, 1982. In accordance with the Board's directive in its April 23, 1982 Order, Applicants have expedited responses to both CASE's interrogatories and requests to produce and provide responses to both with this pleading. Applicants will make requested documents available for inspection and copying either at the Comanche Peak site or in Applicants' corporate office in Dallas, as appropriate. CASE may make arrangements with Applicants by telephone to schedule inspection and copying of documents.

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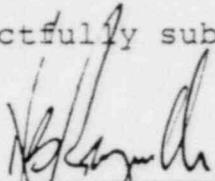
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RESPONSES TO CASE'S TENTH SET OF
INTERROGATORIES AND REQUESTS TO PRODUCE

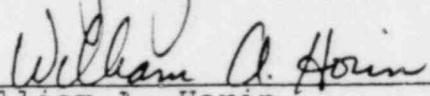
1. No. However, Comanche Peak ordered the service water pumps from Babcock and Wilcox, Ltd. of Canada. The pumps were fabricated and hydrostatically tested by a B&W subvender (AMPCO). Prior to shipment of these pumps, B&W Ltd. was acquired by Hayward Tyler Pump Company. Final assembly, performance testing and shipment was performed by Hayward Tyler Pump Company.
- 2.a. No.
 - b. Hydrostatic tests were successfully performed by AMPCO. Pump performance testing for the purpose of developing performance curves was performed by Hayward Tyler Pump Company. The Unit 1 service water pumps have been operated satisfactorily for significant periods of time for about one year.
 - c. Four.
 - d. Yes.
 - e. Each pump is a two-stage vertical turbine with a Francis vane. These pumps are part of the service water system. The safety significance of that system is described in FSAR Section 9.2.1.
 - f. Applicants will supply these documents for inspection and copying.
 - g. Applicants are not aware of any additional information regarding the pumps manufactured by Hayward Tyler Pump Company for Comanche Peak. Applicants are aware that NRC and Congressional investigations have taken place, but do not know what information (in addition to that supplied in response to Interrogatory 2.f.) is available on this matter.
- 3-7. Applicants will supply these documents for inspection and copying. Applicants note that CASE has already been provided with the documents requested in Item 3 for inspection and copying.
8. Yes. See Applicants' response to Interrogatory 53 of CASE's Ninth Set of Interrogatories to Applicants.

9. Applicants will provide the official file copy of these documents maintained at the Comanche Peak site for inspection and copying.

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

May 3, 1982

STATE OF TEXAS)
)
COUNTY OF DALLAS)

Homer C. Schmidt, being duly sworn, deposes and says:

That he is Manager, Nuclear Services, Texas Utilities Services Inc., and knows the contents of the foregoing Applicants' Response to CASE's Tenth Set of Interrogatories and Request to Produce; that the same is true of his own knowledge except as to matters therein stated on information and belief, and as to that, he believes them to be true.

Homer C. Schmidt

HOMER C. SCHMIDT

Subscribed and sworn to before me this 3rd. day of May 1982.

Lorene Hilliard

Notary



This document is a telecopy. Applicants will furnish the original by separate cover.

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, 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' Responses To CASE's Tenth Set of Interrogatories and Requests to Produce," 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 3rd day of May, 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
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Dr. Kenneth A. McCollom
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Marjorie Ulman Fothschild, Esq.
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
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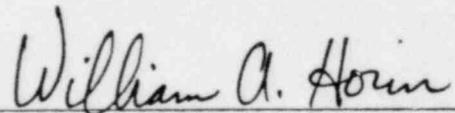
Dr. Richard Cole, Member
Atomic Safety and Licensing
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* Mrs. Juanita Ellis
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1426 South Polk Street
Dallas, Texas 75224

Mr. Scott W. Stucky
Docketing & Service Branch
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20005



William A. Horin

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