

8/9/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

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
(CPSES)

Docket Nos. 50-446 OF SECRETARY
and 50-446 BRANCH

CASE'S THIRTEENTH SET OF INTERROGATORIES
TO APPLICANTS AND REQUESTS TO PRODUCE

Pursuant to 10 CFR 2.740b and 2.741, CASE (Citizens Association for Sound Energy), Intervenor herein, hereby files this, its Thirteenth Set of Interrogatories to Applicants and Requests to Produce.

Please answer the following interrogatories in the manner set forth herewith:

1. Each interrogatory should be answered fully in writing, under oath or affirmation.
2. Each interrogatory or document response should include all pertinent information known to Applicants, their officers, directors or employees, their agents, advisors or counsel. Employees is to be construed in the broad sense of the word, including specifically Brown and Root, any consultants, sub-contractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors.
3. Each document provided should include a sworn statement of its authenticity.
4. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.
5. Identify the person providing each answer, response, or document.
6. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the directives of the Board.

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Because of the time restrictions under which we are presently operating, we request that supplementation be made on an expedited basis.

7. For each item supplied in response to a request for documents, identify it by the specific question number to which it is in response. If the item is excerpted from a document, identify it also by the name of the document. Please also provide the copies in the correct order (rather than in reverse order).
8. The term "documents" shall be construed in the broad sense of the word and shall include any writings, drawings, graphs, charts, photographs, reports, studies, internal memoranda, handwritten notes, and any other data compilations from which information can be obtained.

CASE'S INTERROGATORIES TO APPLICANTS AND REQUESTS TO PRODUCE

1. Provide for inspection and copying copies of the following NCR's (Non-conformance Reports), including all revisions and the originals:
 - (a) All NCR's written by Charles A. Atchison.
 - (b) All NCR's written by Mark Walsh.
 - (c) All NCR's written by Robert Hamilton.
 - (d) All NCR's written by Joseph Krolak.
 - (e) All NCR's written by Darlene Stiner.
 - (f) All NCR's written by Henry Stiner.
2. Provide for inspection and copying the American Welding Society Code.
3. Provide for inspection and copying the forms used at Comanche Peak when welders weld support steel.

Respectfully submitted,

Juanita Ellis
(Mrs.) Juanita Ellis, President
CASE (CITIZENS ASSOCIATION FOR SOUND ENERGY)
1426 S. Polk - Dallas, TX 75224
214/946-9446

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NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH *emf*

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)

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 Thirteenth Set of Interrogatories to Applicants and Requests to Produce
_____ have been sent to the names listed below this 9th day of August, 1982, by:
Express Mail where indicated by * and 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
Stillwater, Oklahoma 74074 | Ms. Lucinda Minton
Panel Law Clerk
U. S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board Panel
Washington, D. C. 20555 |
| * Dr. Richard Cole, Member
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555 | Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555 |
| * Nicholas S. Reynolds, Esq.
Debevoise & Liberman
1200 - 17th St., N. W.
Washington, D. C. 20036 | Atomic Safety and Licensing
Appeal Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555 |
| * Marjorie Ulman Rothschild, Esq.
Office of Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555 | Docketing and Service Section
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555 |

Juanita Ellis

(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound Energy)