

RELATED CORRESPONDENCE

8/20/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 82 AUG 23 P2:53

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)

OFFICE OF SECRETARY
DOCKETING & SERVICE
Docket Nos. 50-445
and 50-446

NOTICE OF DEPOSITION

TO: Mr. C. Thomas Brandt
Mechanical/Civil QA/QC Supervisor
Texas Utilities Generating Company
P. O. Box 1002
Glen Rose, Texas 76043

You are hereby notified that CASE (Citizens Association for Sound Energy), Intervenor in the above-captioned proceedings, will take your oral deposition commencing on Monday, August 23, 1982, at 10:30 A.M.* and continuing until completed. This confirms our telephone conversation the afternoon of 8/18/82 with Applicants and the NRC Staff. The deposition will be taken at the offices of:

Carrington, Coleman, Sloman & Blumenthal
2500 S. Tower, Plaza of the Americas
Dallas, Texas

The deposition will relate to all matters of which you have knowledge in connection with CASE's Contention 5 relating to quality assurance/quality control during construction activities at Comanche Peak Steam Electric Station and the construction activities employed during the plant's construction. Specifically, you should be prepared to answer questions regarding the testimony of Charles A. Atchison, Robert Hamilton, Cordella Hamilton, Henry Stiner, Darlene Stiner, and any other CASE witnesses about which you may testify, and any and all of the matters discussed in their testimony, including all documents on which you plan to or may rely on in your rebuttal testimony. You should also bring with

*immediately following the deposition of Ronald G. Tolson.

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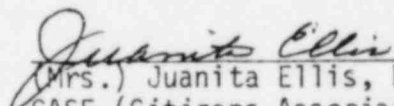
D503

you any of the following which you have access to: the personnel records of Charles A. Atchison, Robert Hamilton, Cordella Hamilton, Henry Stiner, and Darlene Stiner insofar as they may be relied on for your rebuttal testimony; copies of all NCR's written by CASE witnesses Charles A. Atchison, Robert Hamilton, Cordella Hamilton, Darlene Stiner, and Henry Stiner, and any other CASE witnesses about whose testimony you may testify; a copy of the American Welding Society Code; copies of the forms used at Comanche Peak when welders weld support steel; copies of any other documents of which you are aware which pertain to any of these matters or which you may use in your rebuttal testimony; and any other documents relating to the matters referenced herein.

Documents should be considered to be in the broad sense, including but not limited to: internal memoranda; handwritten notes; drawings; sketches; models; photographs; etc. You should include, wherever possible, the dates, locations and circumstances of each document.

The deposition will be taken before an Official Court Reporter. You will be sworn and your deposition will be taken under oath.

Respectfully submitted,



(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound Energy)
1426 S. Polk
Dallas, Texas 75224
214/946-9446

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	I	
	I	
APPLICATION OF TEXAS UTILITIES	I	Docket Nos. 50-445
GENERATING COMPANY, ET AL. FOR AN	I	and 50-446
OPERATING LICENSE FOR COMANCHE	I	
PEAK STEAM ELECTRIC STATION	I	
UNITS #1 AND #2 (CPSES)	I	

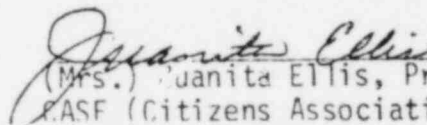
CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of _____
CASE's Notice of Deposition to C. Thomas Brandt _____

have been sent to the names listed below this 20th ____ day of August _____, 1982, by:
Express Mail where indicated by * and First Class Mail elsewhere.

** = Hand delivered

- | | |
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| * 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
Atomic Safety and Licensing Board Panel
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 | 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 |


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