

RELATED CORRESPONDENCE
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

8/19/82

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)

OFFICE OF SECRETARY
DOCKET NO. 50-445
and 50-446

NOTICE OF DEPOSITION

TO: Peter S. Y. Chang
Chief Engineer, Pipe Support Engineering
Texas Utilities Services, Inc.
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 Friday, August 20, 1982 at 1:00 P.M.* and continuing until completed. This confirms our telephone conversation yesterday afternoon 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 failure of the Applicants to include proper analysis factors in their STRUDL (Structural Design Language) computer calculations on pipe supports; problems with the use of Richmond Inserts (used to hang pipe supports); problems with constraint of pipe thermal growth; supports which due to instability are actually non-supports; the testimony of Mark Walsh and any rebuttal to his testimony of which you have knowledge, including all documents on which you will or plan to immediately following the deposition of John C. Finneran

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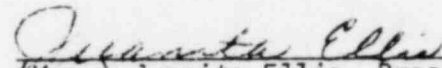
to rely in your rebuttal testimony. You should also bring with you any of the following which you have access to: the personnel records of Mark Walsh insofar as they may be relied on for your rebuttal testimony; the personnel records of Jack Doyle, insofar as they may be relied on for your rebuttal testimony; back-up documents for the March 3, 1982 meeting referred to in the 3/8/82 TUSI Office Memorandum (CASE Exhibit 659E from the July hearings) discussed in the direct testimony and cross-examination of CASE Witness Mark Walsh; back-up documents which were referred to or used as the basis for conclusions contained in the 6/25/82 TUSI Office Memorandum (CASE Exhibit 659G) discussed in the direct testimony and cross-examination of Mark Walsh; the NPSI Design Criteria for pipe supports (the official one issued in May 1981); all documents which were used to define the method used to determine the tensile force in the Richmond Inserts; the current Grinnell Design Criteria for pipe supports at CPSES; a print-out of the criteria in the computer regarding STRUDL procedures, program guides, and any other information relating to STRUDL; a print-out of the computer run in the file of the TUSI FAG (Frame Analysis Group); the Hilti allowables and the procedures for the analysis; a copy of FUB II and the instructions of how to use the FUB II information; the current PSE (Pipe Support Engineering) design criteria volume for pipe supports at CPSES; all the NCR's written by Mark Walsh; a copy of the American Welding Society Code; copies of any other documents of which you are aware or which you may use in your rebuttal testimony; any any other documents relating to the matters referenced herein.

Documents should be considered 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

the Matter of

CATION OF TEXAS UTILITIES
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TING LICENSE FOR COMANCHE
STEAM ELECTRIC STATION
#1 AND #2 (CPSES)

X
X
X
X
X
X
X

Docket Nos. 50-445
and 50-446

CERTIFICATE OF SERVICE

signature below, I hereby certify that true and correct copies of
CASE's Notice of Deposition to Peter S. Y. Chang

been sent to the names listed below this 19th day of August, 1982, by
s Mail where indicated by * and First Class Mail elsewhere.

** = Hand delivered

Administrative Judge Marshall E. Miller
Nuclear Regulatory Commission
Safety and Licensing Board Panel
Washington, D. C. 20555

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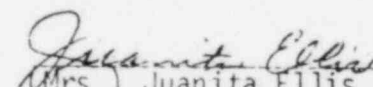
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U. S. Nuclear Regulatory Commission
Washington, D. C. 20555


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