

# CASE

1426 S. Polk  
Dallas, Texas 75224

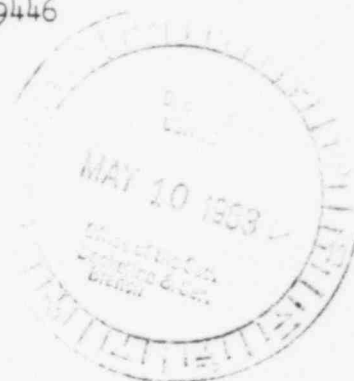
214/946-9446

(CITIZENS ASSN. FOR SOUND ENERGY)

EXPRESS MAIL - Mailed 5/7/83

May 6, 1983

Ms. Marjorie U. Rothschild, Esq.  
Office of Executive Legal Director  
U. S. Nuclear Regulatory Commission  
Maryland National Bank Building  
7735 Old Georgetown Road - Room 10105  
Bethesda, Maryland 20814



Dear Marge:

Subject: 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. 50-445 and 50-446

Stipulation Regarding CASE Exhibits  
and other Discovery Matters

As we discussed briefly yesterday, we would like to attempt to reach a stipulation regarding certain CASE Exhibits before the hearings week after next, if possible. Judge Bloch has indicated that it would be helpful and would expedite things if this could be done prior to the hearings.

As I mentioned today, these are primarily Exhibits which were attached to our recent Briefs and Testimony, which we would like for you to stipulate to as to their authenticity (and, wherever possible, to their admission into evidence). This will save a lot of cross-examination time and avoid our having to go over a lot of already-plowed ground in the hearings. We are identifying the Exhibits by the numbers which we have assigned to them; if this is not sufficient, please let me know and we'll supply more detailed descriptions. We've marked with an \* those documents which are NRC-generated; most of the others are items such as ASME Code sections, documents obtained through discovery which were reviewed by the NRC Staff in preparation of the SIT Report (Investigation Report 50-445/82-26, 50-446/82-14), etc.

Attached to CASE's 4/20/83 Brief on LOCA:

705  
743  
744  
745  
746  
747  
748  
749\*  
750  
752

753  
754\*  
755  
756  
757

759 and 760 - the stipulation needed here is that the 1980 version of this table has the correct values for SA-36 steel at 300° F and 400° F

Attached to Jack Doyle's 4/26/83 Surrebuttal Testimony (CASE Exhibit 761):

758  
761B

DS03

8305110368 830506  
PDR ADDCK 05000445  
PDR

Attached to CASE's 5/3/83 Answers to Applicants and Staff's Briefs on LOCA:

764  
765  
678 excerpts  
677 Dr. Chang's deposition

Attached to Jack Doyle's 5/4/83 Supplemental Surrebutal Testimony (CASE Exhibit 763):

716  
763A (if you are familiar with it)  
763B  
763C-1 thru C-5  
763D-1 thru D-4, and D-6 thru D-9 (and when we get it, D-5)  
763E  
763F  
763G  
763H  
763I

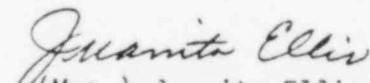
Attached to Mark Walsh's 5/4/83 Surrebuttal Testimony (CASE Exhibit 766):

714

As I mentioned yesterday, we will also attempt to identify for you, in the hopes of obtaining similar stipulations prior to the hearings (or at the beginning of the session on Monday, perhaps) CASE Exhibits which we will be using in the cross-examination of the NRC Staff. (Realistically, though, I'm not sure how much in advance we will be able to get them to you. We'll do the best we can.) Would you prefer that we get copies to the NRC Region IV office in Arlington, rather than mailing them to Washington? We'll discuss this next time we talk.

Sincerely,

CASE (Citizens Association for Sound Energy)

  
(Mrs.) Juanita Ellis  
President

cc: Service List (Express Mail to Board and Parties)

P. S. As I mentioned yesterday, we would also like to get some sort of estimate as to when we can expect answers to our discovery requests filed 4/28/83 (we understand that you have been busy with Briefs but time is running very short). And as discussed 4/27/83, we would like to try to reach some stipulations regarding items 173-180 of our 3/21/83 requests for stipulations which have to do with statements made by NRC Region IV representatives to me regarding "as-built" and CMC's and a recording which I roughly transcribed regarding the meeting where the statements were made.

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