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BY MESSENGER

June 20, 1984

Anthony Z. Roisman, Esq.
Trial Lawyers for Public Justice
2000 P Street, N.W.
Suite 611
Washington, D.C. 20036

Re: Texas Utilities Generating Company;
NRC Docket Nos. 50-445-2 and 50-446-2

Dear Mr. Roisman:

In response to CASE's data requests relating to the issue of intimidation, I have caused a number of documents to be collected for your review at the Dallas office of TUGCO.

A number of documents have been previously provided to you. In addition, I have available in our offices here in Washington, a set of the exit interview files for your review. Since almost all of this file was maintained at the Comanche Peak site, it has been sent to our office.

I would estimate that the documents for your review measure approximately two feet in thickness. It is not clear that all of these documents, or even the greater part of them, are responsive to your request, but we have erred on the side of inclusion in order to avoid any dispute. Included are documents obtained from a review of Board of Director minutes, the Dallas QA office, corporate security office, the ombudsman and hotline files and various corporate executives, as well as the personnel files of those named in my letter of May 10, 1984, to Ms. Ellis and those named in Ms. Garde's letter of June 4. Absence of documents in any of these files does not mean that the subject was not discussed orally.

DS03

Anthony A. Roisman, Esq.
June 20, 1984
Page Two

You may arrange to review the material by calling me or Ms. Susan Spencer at 214-979-8861. If you wish to copy any documents after your review, copies will be provided at the price consistently charged to CASE (\$.15 per page).

With respect to documents provided in the course of the now-pending rate case proceeding, I have not attempted to review the massive material which has been provided in that case. It is, however, not my intention to prevent use in this proceeding of relevant documents provided in that rate case. I believe that your review of documents in response to this data request should eliminate this problem entirely. If it does not, please advise me as I am sure we can resolve the matter.

With respect to names of persons who have been promised confidentiality, we are well along in contacting them and I believe we have been fairly successful to date in persuading persons to allow their names to be used. I am aware of at least one instance, however, where it appears that the whereabouts of the person in question is unknown and we are writing to the last known address. I suspect that when you see the context of this person's statement, you will have no need to pursue the matter.

Am I to understand that Ms. Garde's letter of June 15 constitutes your response to our request for ". . . a summary of testimony that CASE intends to illicit from [each witness], including a list of facts that CASE intends to establish through the persons' testimony."? If so, the response is clearly inadequate. If you really believe, that the time for surprise is over, then you will provide us an adequate response immediately since our witnesses are to be deposed beginning July 2. I believe our on-the-record discussion at last week's prehearing conference makes clear that you are required to specify this information in advance with respect to each of your witnesses. It is not our obligation to ferret out such information from various sources and make inferences as to the facts that your witnesses will testify to. Previously supplied statements (for example, limited appearance statements) are not evidence in this case and hardly provide the type of detail necessary for our witnesses to adequately refresh their memories in advance of depositions.

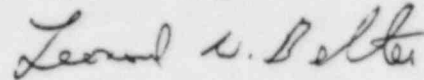
Anthony Z. Roisman, Esq.

June 20, 1984

Page Three

A number of TU witnesses you indicate CASE wishes to depose may have planned vacations in early July. I will contact you shortly to propose a planned schedule for deposing these witnesses commencing on July 2.

Very truly yours,



Leonard W. Belter

LWB/jf

cc: Service list