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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
TEXAS UTILITIES ELECTRIC	)	Docket Nos. 50-445-2 and
COMPANY, et al.	)	50-446-2
	)	
(Comanche Peak Steam Electric	)	(Application for
Station, Units 1 and 2)	)	Operating Licenses)

APPLICANTS' REQUESTS FOR ADMISSION

CASE has not yet responded to Applicants' data request of April 9, 1984, seeking ". . . a summary of testimony that CASE intends to elicit from [each witness], including a list of facts that CASE intends to establish through the person's testimony." By letter of June 15, 1984, CASE provided us with a list of 43 "potential" witnesses. No effort was made to indicate the facts which CASE intended to illicit through each person's potential testimony. Rather, CASE indicated that

". . . virtually all of these witnesses are familiar to you through public proceedings. We expect to narrow the testimony of the witnesses we put on the stand to the scope of the harassment and intimidation issue as clarified in the June 14, 1984 conference.

We are confident that you have this information available to you."

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CASE thereafter cites the example of Betty Brink's testimony and refers us to an interview of Ms. Brink by OI included as page 6 of the OI report number 4-84-006 which we have been provided with.

In order to satisfy ourselves that we have been provided with information which establishes the complete extent of at least some of these witnesses' testimony on the issue of intimidation, we hereby request, in accordance with 10 C.F.R. section 2.742 that CASE admit the accuracy of the following:

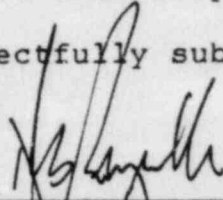
- 1) Attachment 1 hereto is a list of the forty three potential CASE witnesses as of June 15, 1984.
- 2) Of these forty three potential witnesses, attachment 2 accurately reflects those witnesses who are referenced in CASE's November 28 summary of record regarding intimidation or in CASE's August 3, 1983 letter to the Board regarding intimidation.
- 3) The transcript pages and limited appearance statements referenced in CASE's August 3, 1983 letter and in CASE's November 28, 1983 pleading to the Board contain all of the relevant information presently known to CASE that the witnesses on attachment 2 would give if called to testify on the issue of intimidation.
- 4) CASE knows of no additional relevant testimony or statements to those contained in the transcript and limited appearance statements cited in the November 28, 1983 pleading and/or the August 3, 1983 letter to the Board that the witnesses listed on attachment 2 would give with respect to this issue.

5) To the extent that CASE is unable to admit the accuracy of statements 3 and 4 herein with respect to the entire list contained on attachment 2, CASE is requested to specify by individual witness, those witnesses for whom each statement is or is not true.

6) The interview report on page 6 of OI Investigation Report 4-84-006 recites all of the relevant information which Ms. Betty Brink would give if called to testify on the issue of harassment and intimidation.

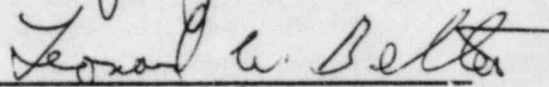
7) CASE knows of no relevant information in addition to the information contained on page 6 of OI Investigation Report 4-84-006 which Ms. Betty Brink would give with respect to this issue.

Respectfully submitted,



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Nicholas S. Reynolds



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Attorneys for Texas Utilities  
Generating Company

List of Potential CASE Witnesses

1.	Charles Atchison	-	NRC <sup>1/</sup> ;DOL
2.	Betty Brink	-	NRC
3.	Bob Bronson	-	NRC
4.	Mike Chandler	-	NRC
5.	George Clancey	-	NRC
6.	Roy Combs	-	NRC
7.	Dennis Culton	-	NRC
8.	J.R. Dillingham	-	NRC
9.	Jack Doyle	-	NRC
10.	John Gates	-	NRC
11.	Bob Hamilton	-	NRC
12.	Cordella Hamilton	-	NRC
13.	Freddie Ray Harrell	-	NRC
14.	Dobie Hatley	-	DOL
15.	Joe Krolak	-	NRC
16.	Stan Miles	-	NRC
17.	Sue Ann Neumeyer	-	DOL
18.	Robbie Robinson	-	NRC
19.	Lester Smith	-	NRC
20.	Henry Stiner	-	NRC
21.	Darlene Stiner	-	NRC
22.	Mark Walsh	-	NRC
23.	Jim Yost	-	NRC; EEOC
24.	Bill Dunham	-	NRC
25.	J.J. Lipinsky	-	NRC
26.	Corey Allen	-	DOL
27.	Tom Miller	-	DOL
28.	Walter Elliott	-	DOL
29.	Don Davis*	-	DOL;NRC
30.	Randy Smith	-	NRC
31.	Jim Euline	-	DOL
32.	Linda Barnes	-	DOL
33.	Billie Orr	-	DOL
34.	Ernest Hadley	-	GAP
35.	Thomas Carpenter	-	GAP
36.	Eddie Snyder*	-	NRC
37.	Jack Pitts*	-	NRC
38.	Robert L. Messerly	-	NRC
39.	Milton Barfield*	-	NRC
40.	Bruce Hearn*	-	NRC
41.	D.T. Oliver*	-	NRC
42.	A. Ambrose*	-	NRC
43.	Jerry Artrip	-	DOL

<sup>1/</sup> "NRC" refers to either the ASLB Operating License proceeding or giving a statement to the NRC Staff. In most cases it means both.

\* Employees involved in the "T-shirt incident".

LIST OF POTENTIAL CASE WITNESSES WHOSE TESTIMONY  
IS COMPLETELY REFERENCED IN CASE AUGUST 3, 1983  
LETTER AND/OR CASE NOVEMBER 28, 1983 PLEADING

1. Bob Bronson
2. Michael Chandler
3. Dennis Colton
4. J. R. Dillingham
5. John Gates
6. Bcb Hamilton
7. Cordella Hamilton
8. Stan Miles
9. Lester Smith
10. Henry Stiner
11. Darlene Stiner
12. Jim Yost
13. Robert L. Messerly

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 )  
(Comanche Peak Steam Electric ) (Application for Operating  
Station, Units 1 and 2) ) License)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicants' Requests for Admission in the above-captioned matter were served upon the following persons by overnight delivery (\*), or deposit in the United States mail, first class, postage prepaid, this 22nd day of June, 1984, or by hand delivery (\*\*) on the 22nd day of June, 1984.

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U.S. Nuclear Regulatory  
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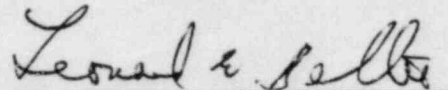
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David R. Pigott, Esq.