

TRIAL LAWYERS FOR PUBLIC JUSTICE, P.C.

COUNSELLORS AT LAW

SUITE 611

2000 P STREET, NORTHWEST

WASHINGTON, D.C. 20036

(202) 463-8600

'84 AGO 14 A9:57

August 13, 1984

OFFICE OF THE
DOCKETING & SET-
OFFICE
BRANCH

Leonard Belter, Esquire
Bishop, Lieberman, Cook,
Purcell & Reynolds
1200 17th Street, NW
Washington, DC 20036

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

Dear Len:

The purpose of this letter is to tie up the loose ends on requests for documents by CASE arising out of the depositions taken in Glen Rose. As you recall I gave you a handwritten note which was typed by your secretary which contained the requests as of the end of the second week. As we complete the review of transcripts I will let you know if more items come up. I now have a copy of that list and with one exception this letter relates to those items. I have attached a copy of the list with numerous handwritten notations on it.

No one here knows what item 1 is and unless we have my original note I doubt that we can figure it out. Item 2 relates to interviews which it was believed were conducted by Brown & Root out of Houston of some the QC inspectors. We still want the interviews or a statement indicating what happened to them and a witness who can tell us about the interviews (why, when, of whom, what learned, etc.). As to item 3 we do not have any written document. If there was one and you gave it to us, could we get another copy. If there is no copy of such a memo we want Tolson to indicate whether he wrote one or not. This could be part of his rebuttal direct.

Items 4, 5, 7, 8, 10, and 11 are completed and the documents received by us or acknowledged by you to not exist. Item 6 remains open and we are anxious to have the minutes, transcripts, tapes or anything else that records the meeting between plant personnel and O. B. Cannon personnel, including Lipinsky sometime after the Lipinsky memo was written. Item 9 relates to testimony by Tolson indicating that he did not complete his investigation of the charges that destructive testing was being done in the safeguards building by electrical QC but believes it was completed by someone. We want to see any written documents relevant

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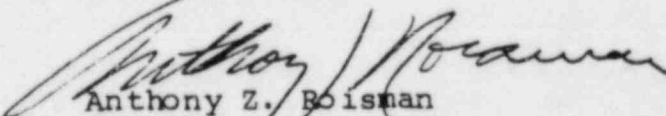
to those charges including any final report or we want testimony by someone with personal knowledge to tell us what happened to the investigation after Tolson changed jobs.

Items 12 and 13 relate to the steps being taken in connection with the "8 Point Program." Item 12 is the agenda of the meeting with the lawyers on employment requirements. If it does not exist we need a written statement to that effect. Item 13 is the correspondence between the audiovisual consultant and TUGCO regarding the slide show. If the scope of that consultation is narrower than assumed and no written documents exist we need a written statement to that effect.

Finally, one item not on my list but that arose during the Neumeyer deposition and subsequent conference call with the Board is the documents relevant to the stainless steel liner incident. We understand that the documents to be produced are (1) all pages of the travelers used by Mac in the deposition; and (2) all the remaining travelers for which Susie was asked to sign off based on the "chits." We need a written status report on this if we are not going to have the documents by the close of business on Thursday, August 16.

If you have any questions please call me. Thanks for your cooperation on these matters.

Sincerely,


Anthony Z. Boisman
Executive Director

Enclosure

cc: All the persons on the service list.

THINGS DUE:

- Requests from Roemer
(Typed from " notes

- 1. Boyce Grier notes on supra
 send out
- 2. B&R interviews (from Houston) ?
- 3. Tolson responsive actions to '79 interviews - LWB
- 4. ~~Handwritten memo to Tolson from Welch ?~~
- 5. ~~Chart by Welch of 17 elec. QC inspectors given to Vega and NRC ?~~
- 6. Lipinsky mgt. transcript ?
- 7. ~~Welch resume ?~~
- 8. ~~Memos March 21 and 22, 1984, from Vega~~ *(may not be 21 memo)*
 Brandt Deposition
 double check.
- 9. Follow-up investigation of destructive testing in Safeguards bldg.
 (None responsive)
- 10. ~~Lawyers communication on Point 8 program - letters between firm and company~~ *LAG*
 (Belter) Drafts by lawyers
 not existing anymore
- 11. ~~RDF criteria document~~
- 12. Agenda of the meeting w/ AKW, NSR
 NO COPIES OF IT
- 13. Communications with AV company - *LAG - nothing substantive*
- 14. Call Board on Witness B discovery deposition and scope of future X-exam >

thinks we have

5 PM

#13, were not comm. with AU Co.
Not AU

#2

#3. Did they ask Tolson or Chapman. Tolson testified that there was a question taken & he wrote something (???) to Clerks/Chapman)

#6. Mgt people who went to have a mtg w/ Lipinsky's super, (tape or notes of those meetings)

#8. take memo

#9. Tolson testified he conducted an invest -