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August 16, 1984

DOCKETING & SERVICE  
BRANCH

Anthony Z. Roisman, Esq.  
Trial Lawyers for Public Justice  
2000 P Street, N.W.  
Suite 612  
Washington, D.C. 20036

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

Dear Tony:

This will respond to your letter of August 13, 1984, relative to document requests by CASE. I have operated on the premise that numerous oral requests made to various attorneys during the taking of depositions have either been complied with already or were memorialized in your list of "Things Due" which is attached to your August 13 letter.

By the way, your list of "Things Due" is a true classic. As I recall, the typed portion represents our secretary's translation of your handwritten notes. The xeroxed handwritten portion represents my notes on the same items. Thereafter, at least on the copy you provided me, there appear to be at least two other persons' notes, one in blue ink and one in black ink, resulting in a document which truly epitomizes this whole proceeding.

Forgive that diversion.

With respect to item 3, I enclose copies of a January 31, 1980 memo from Ron Tolson to Tony Vega and a February 6, 1980 letter from Rose Klimist to Ron Tolson. These appear to be the only responsive materials we can find.

With respect to item 6, the transcript of the meeting between plant personnel and J.J. Lipinsky, I expect to receive a copy shortly and will provide it to you.

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Anthony Z. Roisman, Esq.

August 16, 1984

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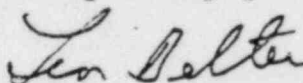
With respect to item 9, the only documents that we are aware of that might be responsive are the reports issued by Tony Vega in response to the concerns expressed by the t-shirt personnel. You already have copies of these reports.

Items 12 and 13 apparently do not presently exist. While there was an agenda of the meeting with the lawyers on employment requirements, no one appears to have preserved their copy of the agenda. With respect to item 13, there has been no audio-visual consultant employed by TUGCO other than the professional whose voice was used to record the audio portion of the presentation. I am advised that there was no correspondence with this individual.

With respect to the document request relating to the Susan Neumeyer deposition, I have contacted Mac Watkins and these documents should be available shortly.

Finally, I have just received a copy of a letter dated August 15, 1984, from Michael Speker to Mark Davidson regarding discovery from witness F. In paragraph two Mr. Speker mentions a request that he be provided with all documents which we have which "pertained" to witness F. I am not at all sure what this means but I will ask Mark if he knows.

Very truly yours,



Leonard W. Belter

LWB/jf

enclosures

cc (w/encls): Stuart Treby, Esq.

cc (w/out encls): Service List