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September 1, 1984
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OFFICE OF SECURITY
DOCKETING & SERVICE
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Peter B. Bloch, Chairman
Atomic Safety and Licensing
Board
U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Herbert Grossman, Esq.
Atomic Safety and Licensing
Board
U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Mr. Walter H. Jordan
881 West Outer Drive
Oak Ridge, Tennessee 37830

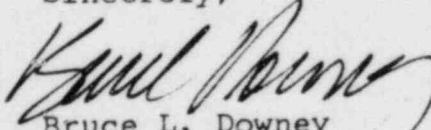
Re: Texas Utilities Electric Company, et al.
(Comanche Peak Steam Electric Station
Units 1 and 2), Docket Nos. 50-445-2 and
50-446-2

Gentlemen:

Enclosed please find notice of deposition and subpoena duces tecum which the Applicants wish to serve on Cory Allen. Please sign the subpoena as soon as possible so that we can serve these papers on Mr. Allen at the earliest practicable date.

Counsel for the Applicants may file a motion to reconsider the Board's decision to call Mr. Allen as a witness. If such a motion is filed, we will try to file it by the close of business on Tuesday, September 4.

Sincerely,


Bruce L. Downey

Enclosure: (1) Notice of Deposition
(2) Subpoena

cc: Service List

8409060291 840901
PDR ADOCK 05000445
G PDR

DS03

United States of America

NUCLEAR REGULATORY COMMISSION

In the matter of:

TEXAS UTILITIES GENERATING COMPANY, et al.

Comanche Peak Steam Electric Station,
Units 1 and 2

TO

Mr. Cory Allen
1102 Columbia
Houston, Texas 77708

DOCKET NO. 50-445 and
50-446

(Application for
Operating Licenses)

YOU ARE HEREBY COMMANDED to appear for a deposition before an
official court reporter at the offices of Vinson & Elkins
in the city of Houston, Texas at the First City Tower
on the 6th day of September 19 84 at 10:00 o'clock A. M.
to testify on behalf of

in the above entitled action and bring with you the document(s) or object(s) described
in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY _____

Bruce L. Downey
Texas Utilities
ATTORNEY FOR _____
Generating Company

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TELEPHONE 202-857-9800

10 C.F.R. 2.720 (f)

On motion made promptly, and in any event
at or before the time specified in the subpoena
for compliance by the person to whom the sub-
poena is directed, and on notice to the party at
whose instance the subpoena was issued, the

presiding officer or, if he is unavailable, the
Commission may (1) quash or modify the sub-
poena if it is unreasonable or requires evidence
not relevant to any matter in issue, or (2) con-
dition denial of the motion on just and reasonable
terms.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

SCHEDULE OF DOCUMENTS

To: Mr. Cory Allen
1102 Columbia
Houston, Texas 77708

1. All reports, memoranda, letters, charts, and any other documents in your possession which were removed from Comanche Peak;
2. With respect to your employment at Comanche Peak, all memoranda, diaries, letters and other written recordings of events at Comanche Peak; all correspondence and other recorded exchanges to and from the Government Accountability Project, and the Trial Lawyers for Public Justice, including, but not limited to, all statements and transcripts of statements; all correspondence and other recorded exchanges to and from the Nuclear Regulatory Commission, including, but not limited to, all statements and transcripts of

statements; and all tape recordings of conversations in your possession regarding Comanche Peak regardless of whether they were recorded by you or another individual;

3. With respect to your current employment at the South Texas Project Electric Generating Station, all memoranda, diaries, letters and other written recordings of events at the South Texas Project; all correspondence and other recorded exchanges to and from the Government Accountability Project and the Trial Lawyers for Public Justice, including, but not limited to, all statements and transcripts of statements; all correspondence and other recorded exchanges to and from the Nuclear Regulatory Commission, including, but not limited to, all statements and transcripts of statements; and all tape recordings of conversations in your possession regarding the South Texas Project regardless of whether they were recorded by you or another individual.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

NOTICE OF DEPOSITION

To: Mr. Cory Allen
1102 Columbia
Houston, Texas 77708

You are hereby notified that Texas Utilities Generating Company will take your oral deposition commencing on Thursday, September 6, 1984, at 10:00 a.m. and continuing until completed. The deposition will be taken at the offices of Vinson & Elkins, First City Tower, Houston, Texas, 77002.

The deposition will relate to allegations made in connection with contention five of the Citizens Association For Sound Energy relating to harassment, intimidation and threats of quality control personnel during construction activities at the Comanche Peak Steam Electric Station. Accordingly, you should be prepared to answer questions as to the date, location and circumstances of each of such allegations of which you have knowledge. You should also bring with you the following:

1. All reports, memoranda, letters, charts, and any other documents in your possession which were removed from Comanche Peak;
2. With respect to your employment at Comanche Peak, all memoranda, diaries, letters and other written recordings of events at Comanche Peak; all correspondence and other recorded exchanges to and from the Government Accountability Project, and the Trial Lawyers for Public Justice, including, but not limited to, all statements and transcripts of statements; all correspondence and other recorded exchanges to and from the Nuclear Regulatory Commission, including, but not limited to, all statements and transcripts of statements; and all tape recordings of conversations in your possession regarding Comanche Peak regardless of whether they were recorded by you or another individual;
3. With respect to your current employment at the South Texas Project Electric Generating Station, all memoranda, diaries, letters and other written recordings of events at the South Texas Project; all correspondence and other recorded exchanges to and from the Government Accountability Project and the Trial Lawyers for Public Justice, including, but not limited to, all statements and transcripts of statements; all correspondence and other recorded exchanges to and from

the Nuclear Regulatory Commission, including, but not limited to, all statements and transcripts of statements; and all tape recordings of conversations in your possession regarding the South Texas Project regardless of whether they were recorded by you or another individual.

The deposition will take place before an Official Court Reporter.

Bruce L. Downey

BISHOP, LIBERMAN, COOK,
PURCELL & REYNOLDS
1200 Seventeenth Street, N.W.
Washington, D.C. 20036
(202) 857-9800

September 1, 1984