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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 OCT -3 A10:28

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

APPLICANTS' MOTION FOR
MODIFICATION OF THE BOARD'S
MEMORANDUM AND ORDER
(Directing Release of OI Reports)

On September 17, 1984 the Licensing Board issued a Memorandum and Order (Directing Release of OI Reports). At page 5 of that Memorandum and Order the Board indicated its willingness to limit those granted access to this information to two legal representatives for each party in an effort to maintain a strict level of confidentiality.

Applicants hereby request that the Board modify this aspect of its Memorandum and Order. In order for Applicants to evaluate the OI Reports, it is essential that representatives of the Applicants familiar with the technical aspects (if any) of the reports be able to review them. Given the past practice by the Licensing Board of delving into the technical merits of issues related to alleged incidents of intimidation, it is possible that the Board will inquire into technical issues, if any, raised by the OI Reports. Under these circumstances, for the Licensing Board to limit access to the OI Reports to only two legal representatives and no technical representatives of the

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Applicants may effectively deprive Applicants of their ability to respond to questions raised by the Board as a result of the OI Reports.

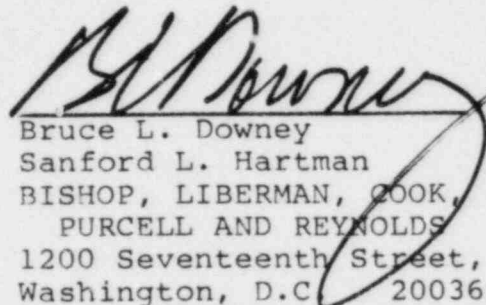
In addition, Intervenor has raised broad technical claims in connection with alleged incidents of intimidation. See CASE's Evidence Of A Quality Control Breakdown, September 27, 1984. In all likelihood Intervenor will endeavor to do so again after reviewing the OI Reports. It will be extremely difficult for Applicants to respond to these claims if access to the OI Reports is limited to two legal representatives.

Accordingly, Applicants hereby request that the Board permit Applicants to designate two persons to review each OI file released in this proceeding. Of course, all persons so designated will be subject to the protective order restricting dissemination of the information contained in the file.

Finally, Applicants designate Messrs. Reynolds and Downey as Applicants' two legal representatives included in the protective order contemplated by the Board's Memorandum and Order.

Applicants do not oppose Intervenor's September 26, 1984 request to the Board permitting three representatives of Intervenor access to the OI Reports.

Respectfully submitted,


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Counsel for Applicants

October 2, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 OCT -3 110:28

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD SECRETAR
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In the Matter of)
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(Comanche Peak Steam Electric) (Application for
Station, Units 1 and 2)) Operating Licenses)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Motion for Modification of the Board's Memorandum and Order (Directing Release of OI Reports)" in the above-captioned matter were served upon the following persons by hand-delivery, overnight delivery,* or by deposit in the United States mail,** first class, postage prepaid, this 2nd day of October, 1984:

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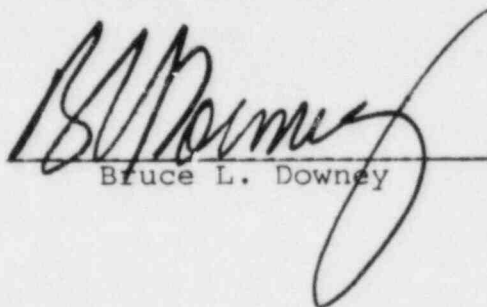
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