

55)
RELATED CORRESPONDENCE

WORSHAM, FORSYTHE, SAMPELS & WOOLDRIDGE

TWENTY-FIVE HUNDRED 2001 BRYAN TOWER

DALLAS, TEXAS 75201

TELEPHONE: (214) 748-9355

JOE A. WORSHAM
1881-1976

OF COUNSEL
JOS. IRION WORSHAM
EARL A. FORSYTHE

TELECOPIER: (214) 880-0011

- M. D. SAMPELS
- ROBERT A. WOOLDRIDGE
- NEIL D. ANDERSON
- SPENCER C. RELYEA
- RONALD M. HANSON
- J. DAN BOHANNAN
- TRAVIS E. VANDERPOOL
- JUDITH K. JOHNSON
- RICHARD L. ADAMS
- DAVID C. LONGERAN
- JOHN W. MCREY-OLDS
- THOMAS F. LILLARD
- ROBERT K. WISE
- TIMOTHY A. MACK
- WM. STEPHEN BOYD
- MARK R. WASEM
- STEPHEN D. JOHNSON
- CHRISTOPHER R. MILTENBERGER
- ROBERT P. OLIVER
- MARK SCHWARTZ
- DANIEL JOHN REGAN, JR.
- RICHARD G. MOORE
- CECELIA J. BRUNER

85 APR 15 11:16

OFFICE DOCKE
SERVICE

April 10, 1985

Mr. Anthony Z. Roisman
 Government Accountability Project
 1555 Connecticut Avenue
 Suite 202
 Washington, D.C. 20036

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

Dear Mr. Roisman:

This letter is in response to your letter to me dated March 29, 1985. In that letter you made two informal discovery requests concerning the harassment and intimidation portion of the Comanche Peak proceeding: First, you requested that Applicants update their prior document productions, and second you requested that Applicants propose a schedule for the "final" depositions of Messrs. Vega, Chapman, and Tolson.

Applicants will promptly conduct a file search for documents prepared since Applicants' last document production that are responsive to Intervenor's outstanding requests. If this search uncovers any new, responsive documents concerning events occurring prior to June 30, 1984, Applicants will either produce the documents for inspection and copying or object to their production on or before April 22, 1985.

Applicants, however, are not agreeable to making Messrs. Vega, Chapman, or Tolson available for what you describe as their "final" depositions. The testimony of these witnesses already covers approximately ten full days of transcripts, and the time for taking their depositions is past. Moreover, the evidentiary record of the harassment and intimidation proceeding is now closed except for the completion of the O. B. Cannon testimony, presentation of the NRC Staff's evidence, and the presentation of Applicants' rebuttal case. Accordingly, there is simply no point to the depositions you propose unless Applicants decide to call Mr. Vega, Mr. Chapman, and/or Mr. Tolson as rebuttal witnesses, a decision that has not been made, and even then only on their rebuttal testimony.

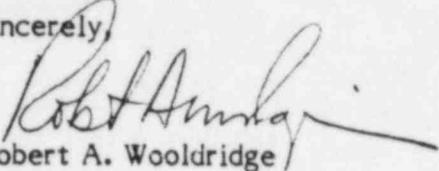
8504160471 850410
 PDR ADDCK 05000445
 G PDR

7503

Mr. Anthony Z. Roisman
April 10, 1985
Page Two

If our document search uncovers any responsive documents, we will contact you informally to arrange the logistics of the production.

Sincerely,


Robert A. Wooldridge

RAW/klw

cc: Service List