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October 24, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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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
COMPANY, <u>et al.</u>	)	50-446/2
	)	
(Comanche Peak Steam Electric	)	
Station, Units 1 and 2)	)	

NRC STAFF SECOND ANSWER TO CASE'S MOTION FOR PRODUCTION  
OF DOCUMENTS REGARDING PROPOSED TESTIMONY OF EG&G

The Staff hereby provides its second response to "CASE's Motion for Production of Documents to the NRC Staff Regarding Proposed Testimony of EG and G" (September 26, 1984).

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please produce a copy of all written communications between any person at the NRC and any of the persons:
  - a. who worked on developing the scope of work and goals of the contract which resulted in the EG&G report;
  - b. who worked on the preparation of the report in any capacity;
  - c. who have been or will be consulted by the NRC for purposes of analyzing the report and preparing for or submitting testimony with respect to the report.

2. Please produce a copy of all written communications between any NRC employees regarding the development of the contract for the EG&G report, the progress on completing the work, the draft and final work products and the subject matter of the report itself. Also produce any drafts of the EG&G report or proposed changes or modifications of the EG&G report prepared by any NRC employee, any NRC contractor, or any employee of any NRC contractor.

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RESPONSE TO ITEMS 1 AND 2

Attachment A contains all documents in the possession of the NRC Staff which are responsive to these two requests.

3. Please produce a copy of all materials examined or relied upon in formulating the views expressed in the EG&G report. To the extent any material is already a part of the record of this case an identification of the material, where it appears in the record and for what portion of the report it was relied upon will be sufficient.

RESPONSE

See October 16, 1984 response.

4. With respect to the EG&G report please produce a copy of all written notes, drafts, calculations, or any other documents prepared by any person who participated in the preparation of the EG&G report or participated in the preparation of any of the materials examined or relied upon in preparing the report.

RESPONSE

Attachment B contains various draft version of the EG&G Report. The Staff will be transmitting other documents responsive to this request which were originally in the possession of the EG&G team members on October 29, 1984.

5. Identify by name, address and phone number, and provide a curriculum vita for every person who participated in any way in the preparation of the EG&G report and indicate what work was done by them.

RESPONSE

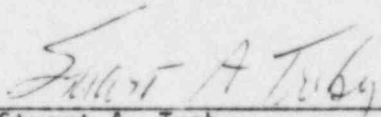
See October 16, 1984 response.

6. Please produce a copy of all written communications between any NRC employee or any EG&G employee or any person used by the NRC or EG&G for the purpose of working on the EG&G report of the developing of

data for the report any other person with respect to the report or its subject matter.

RESPONSE

Statements of non-disclosure which were signed by Messrs. Kaplan, Stratton and Rice were provided as Attachment D to October 16, 1984 response. Additional statements of non-disclosure of D. Bowers, N. Margulies, J. Delaney, L. E. Kickum, G. C. Andognini and L. Kirol, are being provided as Attachment D. Some additional communication is also being provided. However, it should be noted that communication between EG&G team members occurred in the form of notations to drafts of the report which has been provided in Attachment B. The Staff will be transmitting other documents in this category which were originally in the possession of the EG&G team members on October 29, 1984.

  
\_\_\_\_\_  
Stuart A. Treby  
Assistant Chief Hearing Counsel

Dated at Bethesda, Maryland  
this 24th day of October, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF SECOND ANSWER TO CASE'S MOTION FOR PRODUCTION OF DOCUMENTS REGARDING PROPOSED TESTIMONY OF EG&G" with attachments in the above-captioned proceeding have been served on the following by hand delivery (\*\*\*) or by express mail or overnight delivery (\*\*\*), this 24th day of October, 1984:

Peter B. Bloch, Esq., Chairman\*\*  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

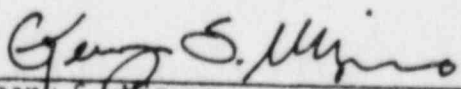
Herbert Grossman, Alternate Chairman\*\*  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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Administrative Judge  
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\_\_\_\_\_  
Geary S. Mizuno  
Counsel for NRC Staff

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

TEXAS UTILITIES ELECTRIC COMPANY, )  
et al. )

(Comanche Peak Steam Electric )  
Station, Units 1 and 2) )

Docket Nos. 50-445/2  
50-446/2

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF SECOND ANSWER TO CASE'S MOTION FOR PRODUCTION OF DOCUMENTS REGARDING PROPOSED TESTIMONY OF EG&G" without attachments in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or deposit in the Nuclear Regulatory Commission's internal mail system (\*), this 24th day of October, 1984:

Dr. Kenneth A. McCollom  
Administrative Judge  
Dean, Division of Engineering,  
Architecture and Technology  
Oklahoma State University  
Stillwater, OK 74078  
  
Mr. James E. Cummins  
Resident Inspector/Comanche Peak  
Steam Electric Station  
c/o U.S. Nuclear Regulatory Commission  
Glen Rose, TX 76043

Mr. Michael D. Spence, President  
Texas Utilities Electric Company  
Skyway Tower  
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Austin, TX 78711

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William L. Brown  
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Arlington, TX 76011

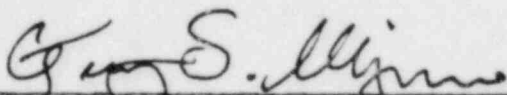
Billie Pirner Garde  
Citizens Clinic Director  
Government Accountability Project  
1901 Que Street, N.W.  
Washington, DC 20009

Atomic Safety and Licensing Board  
Panel\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Atomic Safety and Licensing Appeal  
Panel\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Robert A. Wooldridge  
Worsham, Forsythe, Sampels & Wooldridge  
2001 Bryan Tower, Suite 2500

Docketing and Service\*  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

  
\_\_\_\_\_  
Geary S. Mizuno  
Counsel for NRC Staff