

RESPONSE TO ITEMS 1 AND 2

Attachment A contains additional 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 view 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 additional draft versions of the EG&G Report.

Attachment C contains written notes and other documents prepared by persons who participated in the preparation of the EG&G Report. The following documents are being withheld from discovery pursuant to 10 C.F.R. § 2.740(b)(2). That section of the Commission's regulations provides, in part, that "[i]n ordering discovery of such materials [trial preparation materials] when the required showing has been made, the presiding officer shall protect against disclosure of the mental impressions, conclusions, opinions, or legal theories of an attorney or other representative of a party concerning the proceeding."

1. One-page handwritten memo by W. Stratton of 8/16/84 phone conversation with S. A. Treby, G. S. Mizuno, M. Williams, C. Obenshain, B. Kaplan re preparation of report.

2. Two-page handwritten memo by W. Stratton of 8/16/84 phone conference with S. A. Treby, G. S. Mizuno, T. Ippolito, J. Scinto, R. G. Bachman, O. Obenshain, B. Kaplan, C. Rice, Andognini, Leach re subject matter and preparation of EG&G Report.
3. Three-page handwritten memo by W. Stratton of conversation with S. A. Treby regarding preparation of EG&G Report.
4. Three-page handwritten memo by W. Stratton dated 7/19/84 regarding 7/19/84 meeting at CPSES with T. Ippolito and S. A. Treby. Does not reflect privileged communications.
5. Four-page document dated 7/18/84 consisting of handwritten notes by C. Rice to self. Notes reflect information obtained from S. A. Treby and/or T. Ippolito.

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

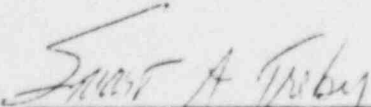
See October 16, 1984 response.

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

Attachment D contains additional documents which are responsive to this request.

Respectfully submitted,



Stuart A. Treby
Assistant Chief Hearing Counsel

Dated at Bethesda, Maryland
this 29th 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 THRID 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 internal mail (*), or by hand delivery (**), or by express mail or overnight delivery (***), this 29th day of October, 1984:

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

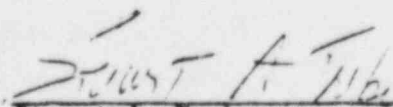
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