

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

MICHAEL D. SPENCE
PRESIDENT

November 12, 1984

Mr. Darrell G. Eisenhut
Director, Division of Licensing
Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: Comanche Peak Steam Electric Station
Units 1 and 2 (Nos. 50-445 and 50-446)
Texas Utilities Generating Company
Program Plan, October 8, 1984

Dear Mr. Eisenhut:

Two recent letters (October 26 and September 26, 1984) from the Government Accountability Project (GAP) to you have contained such attacks on my company and the Comanche Peak project that this response is imperative.

First, I want to repeat my sincere commitment to a thorough and complete resolution of any safety concerns which may arise from the extensive investigation by the Technical Review Team (TRT) at Comanche Peak and the responses by TUGCO to potential open items provided to us by the TRT. As I have previously stated, we take very seriously the potential issues you have brought to our attention. We have no higher priority than the safe design, construction and operation of Comanche Peak in accordance with regulatory requirements, not withstanding the scurrilous characterizations by GAP.

We are in the process of completing a revision to our Comanche Peak Response Team (CPRT) Program Plan which will address the programmatic concerns expressed by NRC in the course of our meetings of October 19 and 23. I am confident that you will find these significant revisions to the organization and Program Plan, as well as subsequent changes to the issue specific Action Plans, to be fully responsive to NRC concerns.

Contrary to the accusations in GAP's letter that the NRC/TRT scope is limited and inadequate, it appears to us to be the most comprehensive scrutiny of a nuclear project by the NRC Staff to date. That effort, followed by our CPRT program, is unquestionably of sufficient breadth and depth to lay to

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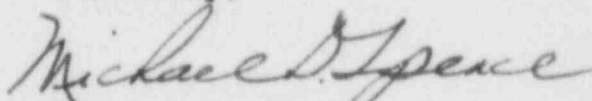
rest any reasonable person's concerns about the Comanche Peak project. We are confident that the preliminary conclusions reached in July by the NRC Comanche Peak Special Review Team (that our management control over the construction, inspection and testing programs is effective, and our programs are being sufficiently controlled to allow continued plant construction while the NRC completes its review and inspection of the facility) will be fully supported by the much more extensive TRT effort.

In light of the extensive NRC investigations and thorough CPRT response, GAP claims regarding suspension of our construction permit or denial of an operating license are clearly absurd.

We consider the GAP letters to be an attempt to urge the NRC Staff to treat Comanche Peak excessively and thereby to further delay completion of NRC Review. You, of course, know that the Staff can never satisfy GAP because it does not enter the picture with an objective view. We trust that you will not fall victim to GAP's strategy.

The gross distortions of and unwarranted attack upon the corporate character of Texas Utilities in the GAP letter of October 26 is a familiar theme to anyone who has followed the modus operandi of GAP in its attacks on the NRC and the nuclear industry. We have no apologies to make nor a need to feel timid about our corporate reputation of service to the communities which we are privileged to serve, and our sense of responsibility to our customers, employees, and stockholders. Above all, we remain dedicated to the safety of Comanche Peak and committed to all applicable regulatory requirements and to the protection of the public health and safety.

Sincerely,


Michael D. Spence

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cc: Service List