

Russell J. Christesen
President and
Chief Operating Officer

January 4, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

Re: Comanche Peak Steam Electric Station
Units 1 and 2 (Nos. 50-445 and 50-446)
Government Accountability Project
Letter to Above dated October 26, 1984

Dear Mr. Denton and Mr. Eisenhut:

This letter serves as an emphatic rebuttal of the Government Accountability Project (GAP) letter to the Directors of the Office of Nuclear Reactor Regulation and Division of Licensing dated October 26, 1984. The malicious attack on Ebasco Services Incorporated by GAP and the Citizens Association for Sound Energy (CASE) is another example of their policy of generating frivolous and unsubstantiated allegations without their respective organizations bearing the burden of proof. Ebasco strongly feels that their letter is not only inaccurate but also defamatory.

Ebasco is proud of its well-earned reputation for competence, integrity and independence. We have been involved successfully in the engineering and/or construction of more than 30 commercial nuclear power projects and other major reactor projects. Our experience reflects an extensive involvement with reactor projects spanning the world for more than a quarter of a century.

Ebasco's excellent qualifications in Quality Assurance program activities are well-known throughout the nuclear industry. Recognition of Ebasco's qualifications is exemplified by the Cincinnati Gas & Electric Company's (CG&E) selection of Ebasco in December 1983 for the role of Independent Auditor of the quality of construction at the Wm. H. Zimmer Nuclear Power Station - Unit 1, in support of CG&E's program to complete the construction of that plant. As stated in CG&E's December 6, 1983

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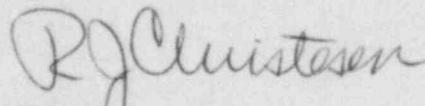
letter to the U. S. Nuclear Regulatory Commission, Region 3, Mr. J. G. Keppler, Regional Administrator, Ebasco was selected for the role of Independent Auditor based on CG&E's evaluation of Ebasco's "independence, competence and approach."

Moreover, the American Nuclear Society recently honored three senior Ebasco personnel, Mr. Leonard F. C. Reichle, Group Vice President, Mr. Benjamin E. Tenzer, Vice President, and Mr. Bertrand R. Mazo, Director of Quality of Assurance, with the "ANS Special Award for Distinctive QA achievement in the nuclear energy field". Messrs. Tenzer and Mazo are directly responsible for the management and supervision of Ebasco's corporate quality programs. This was the first time that the American Nuclear Society presented an award for this category and represents another milestone for Ebasco in the development of sound Quality Assurance practices in the nuclear industry.

I have reluctantly been compelled to write this letter in view of the unsubstantiated and inaccurate charges leveled against Ebasco in the referenced October 26, 1984 letter. I trust that the Nuclear Regulatory Commission will deal responsibly with this matter.

From a broader standpoint, we at Ebasco are also deeply concerned about the extent to which groups such as C P and CASE are able to abuse the administrative procedures of our regulatory agencies to disrupt and delay agency proceedings. We are available to meet with you at your convenience to discuss methods of dealing with both the immediate matter and the problem in general.

Very truly yours,



Russell J. Christesen