

6516

RELATED CORRESPONDENCE

Dated: June 8, 1988

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD



In the Matter of	)	Docket Nos. 50-445-OL
	)	50-446-OL
TEXAS UTILITIES ELECTRIC	)	
COMPANY et al.	)	
(Comanche Peak Steam Electric	)	(Application for an
Station, Units 1 and 2)	)	Operating License)
_____	)	

APPLICANTS' SUPPLEMENTATION TO  
THEIR ANSWERS TO CASE'S  
INTERROGATORIES TO APPLICANTS (AUGUST 27, 1985)

Without waiving their objections heretofore interposed,  
the Applicants hereby supplement their responses to "CASE'S  
Interrogatories to Applicants (August 27, 1985)" as follows:

Interrogatory No. A-2:

Please provide all available information on each and every  
person who has now been hired or who is yet to be hired to  
"fill in the blanks on (Mr. Council's organizational) chart(s)."  
(Tr. 15/23-26/2; etc.)

Please provide a complete resume for each individual so named,  
and give all information (e.g., name, title, responsibilities,  
etc.) on the position he or she is/will do with TUGCO.

Response:

Updated organization charts are available for review.  
Resumes will be obtained and provided if specifically requested.

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Interrogatory No. A-3:

Please provide the names, titles, position, responsibilities and complete resume on each individual who is in the second and third tiers under the management tiers given on Mr. Council's charts. Please note which, if any of these individuals is not a full-time TUGCO employee and which are. For each person who is not a full-time TUGCO employees, please provide full information on his or her employer, contractor, etc. and if that company, contractor, etc. has been hired as a consultant for the Comanche Peak project.

Response:

J. E. Krechting - Director of Technical Interface (TU)

C. J. Rawley - Principal Engineer, NEO (TU)

W. R. Deatherage - Director of Engineering (TU)

O. W. Lowe - Director of Engineering (TU)

J. W. Muffett (TU)

P. B. Stevens (TU)

R. D. Calder (TU)

J. L. Barker (TU)

R. T. Jenkins (TU)

C. A. Carter (TU)

T. G. Tyler - Director of Projects (TU)

C. L. Terry (TU)

L. Sluiter (TU)

L. D. Isham (TU)

D. M. Reynerson - Director of Construction (TU)

H. C. Dodd (B&R)

R. Green (Fluor-Daniel)

M. M. Gonzalez (TU)

H. W. Sorensen (TU)

D. R. Wilkins (TU)

R. P. Klause - Technical Consultant (SWEC)

K. C. Warapius - Site Project Manager (IMPELL)

C. Bradbury (IMPELL)  
W. Johnston (IMPELL)  
J. H. Wawrzeniak (IMPELL)  
G. R. Ashley (IMPELL)  
D. Rewinkel (IMPELL)

J. Crnich - Site Project Manager (EBASCO)

E. N. Odar (EBASCO)  
B. Leo (EBASCO)  
R. Shetty (EBASCO)  
R. Baker (EBASCO)  
M. Strehlow (EBASCO)  
P. Abbott (EBASCO)

R. H. Ackley, Jr. - Project Manager (SWEC)

J. R. Peterson (SWEC)  
S. L. Stamm (SWEC)  
M.P. Obert (SWEC)  
P. Fitzgerald (SWEC)  
F. J. Burns (SWEC)  
P. Reilly (SWEC)  
G. Wilkes (SWEC)  
P. Raysicar (SWEC)  
C. Fonseca (SWEC)  
R. Spence (SWEC)

J. F. Streeter - Director, Quality Assurance (TU)

D. M. McAfee (TU)  
P. E. Halstead (TU)  
C. H. Welch (TU)  
D. E. Deviney (TU)  
M. Edmonds (NUTECH)

R. D. Walker - Manager, Nuclear Licensing (TU)

D. R. Woodlan (TU)  
J. S. Marshall (TU)  
R. P. Baker (TU)  
D. A. Noss (Daniel)

L. E. Powell - Manager, Administration (TU)

S. S. Palmer (TU)  
D. L. Anderson (TU)  
W. D. Fenoglio (TU)  
T. L. Smart (TU)  
G. M. Hamilton (TU)  
R. G. Spangler (TU)

D. Ferguson - Director, CPRT (Delian)

R. Werner - Manager, SAFETEAM (TU)

F. Green (SYNDECO, Inc.)  
T. Gibbs (NIC)

J. C. Kuykendall - Vice President Administration (TU)

J. L. Brackney (TU)  
H.J. Cheatham (TU)

Interrogatory No. A-4:

Please provide current updates in changes in positions and/or titles for each of the persons on each of Mr. Council's organizational charts. In particular, give complete information on each and every new individual who has been hired and/or transferred from another position to those positions, each and every person (e.g., Beck -- Tr. 18/18-20 -- who was "filling in as manager of nuclear full [sic] and safety analysis" and George -- Tr. 18/15-17 -- who was "filling (in) as manager of engineering") now in those (and every other) spot.

Response:

Updated organization charts are available for review. Resumes will be obtained and provided if specifically requested.

Interrogatory No. H-3:

Provide the documents requested by CYGNA in its 8/1/85 letter 84086.078 to John Beck, TUGCO (referring to a 6/27/85 request).

Response:

The need to supplement these interrogatories has been superseded by the "Agreement Between Case and Applicants Regarding Discovery Matters Relating to Comanche Peak Nuclear Power Plant" dated August 19, 1986. Item 8 of the "Agreement" provides that "Three copies of all letters, including those responding to specific CYGNA questions, from Applicants to

CYGNA will be sent to Mrs. Ellis, at no charge to CASE, at the time they are sent to CYGNA by Applicants . . . ."

Documents are currently being provided in accordance with the "Agreement", therefore, no further supplementation will be provided in response to Interrogatory Nos. H-3 and H-6.

Interrogatory No. H-6:

Provide CASE with copies of all documents supplied to CYGNA in response to CYGNA's questions (such as the ones which were attached to CYGNA's 8/6/85 letter 84042.39 to CASE) at the time Applicants send them to CYGNA.

(This is necessary because of the delay in CASE's receiving documents such as these. The 8/6/85 letter from CYGNA attached a 3" thick stack of documents with dates which ranged from September 1984 to June 17, 1985. This long delay in receiving documents is unacceptable to CASE. We believe that the most reasonable way to see that they are provided in a timely fashion is for Applicants to provide them to CASE at the same time they provide them to CYGNA.)

Include in your response whether or not Applicants will voluntarily agree to provide CASE with such documents at the same time Applicants provide them to CYGNA.

Response:

The need to supplement these interrogatories has been superseded by the "Agreement Between CASE and Applicants Regarding Discovery Matters Relating to Comanche Peak Nuclear Power Plant" dated August 19, 1986. Item 8 of the "Agreement" provides that "Three copies of all letters, including those responding to specific CYGNA questions, from Applicants to CYGNA will be sent to Mrs. Ellis, at no charge to CASE, at the time they are sent to CYGNA by Applicants . . . ."

Documents are currently being provided in accordance with the "Agreement", therefore, no further supplementation will be provided in response to Interrogatory Nos. H-3 and H-6.

Respectfully submitted,

TEXAS UTILITIES ELECTRIC COMPANY  
For the Owners of CPSES



---

George L. Edgar  
Newman & Holtzinger, P.C.  
1615 L Street, N.W.  
Washington, D.C. 20036  
(202) 955-6600

Attorneys for Texas Utilities  
Electric Company

Signatures

As to Answers:

I, Debra L. Anderson, being first duly sworn, do depose and say that I am a Project Manager for the Generating Division of Texas Utilities Electric Company, that I have assisted in the preparation of the foregoing answers, and that the foregoing answers are true, except insofar as they are based on information that is available to the applicants but not within my personal knowledge, as to which I based on such information, believe them to be true.

Debra L. Anderson

Sworn to before me this  
25th day of May, 1988

Olga Jones

Notary Public

My Commission Expires: 5-8-91

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD



In the Matter of )  
 ) Docket Nos. 50-445-OL  
 ) 50-446-OL  
TEXAS UTILITIES ELECTRIC )  
COMPANY et al. )  
 ) (Application for an  
 ) Operating License)  
(Comanche Peak Steam Electric )  
Station, Units 1 and 2 )  
\_\_\_\_\_ )

CERTIFICATE OF SERVICE

I, Thomas A. Schmutz, hereby certify that the foregoing Applicants' Supplementation To Their Answers to CASE's Interrogatories To Applications (August 27, 1985) was served this 8th day of June 1988, by mailing copies thereof (unless otherwise indicated), first class mail, postage prepaid to:

\*Peter B. Bloch, Esquire  
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Atomic Safety and Licensing  
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U.S. Nuclear Regulatory  
Commission  
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\*Alan S. Rosenthal, Esq.  
Chairman  
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Commission  
Washington, D.C. 20555

\*Adjudicatory File (2 copies)  
Atomic Safety and Licensing  
Board Panel Docket  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Assistant Director for  
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Comanche Peak Project Division  
U.S. Nuclear Regulatory  
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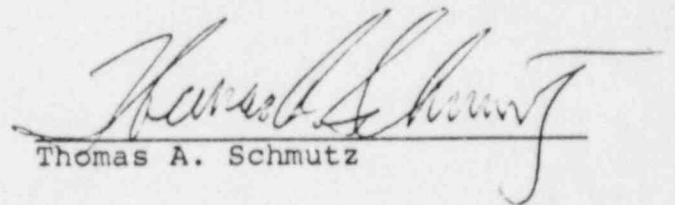
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Thomas A. Schmutz

Dated: June 8, 1988