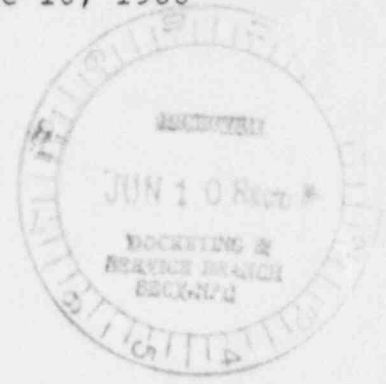


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RECEIVED CORRESPONDENCE

Dated: June 10, 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.)	
)	(Application for an
(Comanche Peak Steam Electric)	Operating License)
Station, Units 1 and 2))	

APPLICANTS' SUPPLEMENTAL RESPONSES
TO CASE'S DISCOVERY REQUESTS

Applicants herewith provide supplemental responses to Interrogatories 31 and 32 of CASE's 6/19/87 Interrogatories and Interrogatory 32 of CASE's 6/30/87 Interrogatories. In providing these responses, Applicants do not waive their previous objections that these interrogatories request information which is irrelevant to the subject matter of this proceeding and are not reasonably calculated to lead to the discovery of admissible evidence.

6/19/87 Interrogatories

Interrogatory No. 31:

- a. How many individuals who are currently or were formerly employed by Stone & Webster during the period June, 1986 through the present were former employees of NPS Industries, ITT, Grinnell, Texas Utilities Electric Company, or one of its affiliated companies, Gibbs and Hill, or any other of the Applicants or their agents, and worked at any time previously on the Comanche Peak project (either onsite or offsite)?

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- b. Provide a list of all such individuals, along with details of the dates they originally worked for the companies in question, the dates they were hired by Stone & Webster for their assignment to work on Comanche Peak, their current job title and their last known address and telephone number.

Response:

Applicants have obtained from Stone & Webster a listing of individuals who were employed by Stone & Webster during the period of June, 1986 to July, 1987, and who were former employees of NPSI, ITT Grinnel, TU Electric, Gibbs & Hill, Tex-La Electric Cooperative of Texas, Inc., Brazos Electric Power Cooperative, Inc. or Texas Municipal Power Agency, and worked on the CPSES project. The information requested by this interrogatory, such as the date each individual worked for the aforementioned companies, the date the individual was assigned to CPSES, and their job title as of the date the information was gathered is also included on the listing. This listing is available for inspection and copying in the Reading Room at the Dallas offices of TU Electric.

Interrogatory No. 32:

- a. How many individuals who are currently or were employed by Applicants or any of their consultants, contractors, subcontractors, or any other companies working on reinspection/reanalysis effort and/or the corrective actions resulting from such effort, during the period August, 1985 through the present, were former employees of NPS Industries, ITT, Grinnell, Texas Utilities Electric Company or one of its affiliated companies, Gibbs and Hill, or any other of the Applicants or their agents, and worked at any time previously on the Comanche Peak project (either onsite or offsite)?

- b. Provide a list of all such individuals, along with details of the dates they originally worked for the companies in question, the dates they were hired for their assignment to work on Comanche Peak, by whom they were hired, their current job title and status, and, if they were no longer employed at Comanche Peak, their last known address and telephone number.

Response:

Applicants' have obtained from Ebasco and Impell lists of individuals who were employed by Ebasco and Impell, respectively, during the period of August, 1985 to August, 1987, and who worked on the reinspection/reanalysis and/or corrective action resulting from reinspection/reanalysis efforts associated with CPSES and who were former employees of NPSI, ITT, Grinnell, TU Electric, Gibbs & Hill, Tex-La Electric Cooperative of Texas, Inc., Brazos Electric Power Cooperative, Inc. or Texas Municipal Power Agency. In addition, Applicants have received from Ebasco a listing of additional Ebasco personnel who may have been previously employed by one of the aforementioned companies.

Applicants' have prepared a listing of individuals who were TU Electric employees from August, 1985 to August, 1987 who previously performed work associated with CPSES for NPSI, ITT Grinnell, TU Electric, Gibbs & Hill, Tex-La Electric Cooperative of Texas, Inc., Brazos Electric Power Cooperative, Inc. or Texas Municipal Power Agency.

The additional information requested by this interrogatory, such as the date each individual worked for the aforementioned companies, the date the individual was hired by Ebasco, Impell, or TU Electric, and their job title as of the date the information was gathered is also included on the lists. These lists are available for inspection and copying in the Reading Room at the Dallas offices of TU Electric.

6/30/86 Interrogatories

Interrogatory No. 32:

- a. How many individuals who are currently or were employed by Stone & Webster during the period August 1985 through June 1986 were former employees of NPS Industries, ITT Grinnell, Texas Utilities Electric Company or one of its affiliated companies, Gibbs & Hill, or any other of Applicants or their agents, and worked at any time previously on the Comanche Peak project (either onsite or offsite)?
- b. Provide a listing of all such individuals, along with details regarding the dates they originally worked for the companies in question, the dates they were hired by Stone & Webster for their assignment to the reinspection/reanalysis effort at Comanche Peak, their current job title and status, and if they are no longer employed at Comanche Peak, their last known address and telephone number.

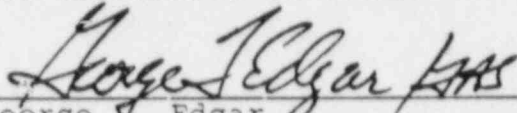
Response:

Pursuant to 10 C.F.R. 2.740(e)(2)(i), "Applicants' Supplemental Response to CASE's 6/30/86 Interrogatories and Request for Documents and Motion for Protective Order" served

and filed June 8, 1987 is hereby further supplemented with
the information contained on Attachment A.

Respectfully submitted,

TEXAS UTILITIES ELECTRIC COMPANY
For the Owners of CPSES



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

Attorneys for Texas Utilities
Electric Company

ATTACHMENT A

EMPLOYEE NAME	ASSIGNED TO CPSES	TITLE	STATUS	EMPL DATES
** PREVIOUS EMPLOYER GIBBS & HILL				
CHANG, DAVID	05/85	TITLED ENGR.	CURRENT	1979-1981
DAUS, VIRGILIO	12/02/85	ENGR.	OFF ROLL	06/86-10/86
LO, ANDREW	05/86	ENGR	OFF ROLL	1979-1981
ZIGMOND, EDWARD	01/86	TITLED ENGR.	CURRENT	06/73-03/77
** PREVIOUS EMPLOYER ITT GRINNELL				
PRESCOTT, MICHAEL	01/86	ENGR	CURRENT	11/76-08/85
** PREVIOUS EMPLOYER TU SERVICES				
LAZAROVICH, JOHN	08/26/85	ENGR	CURRENT	01/80-08/80 AND 06/81-08/85

Signatures

As to Answers:

I, Susan S. Palmer, 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.

Susan S. Palmer

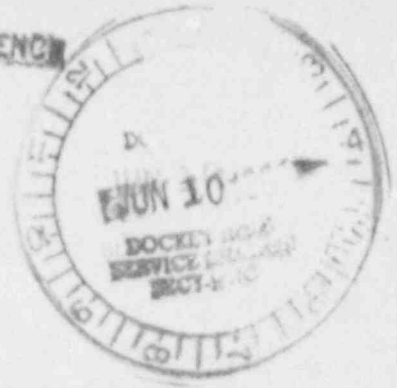
Sworn to before me this
9th day of June, 1988

Jeri Smart

Notary Public

My Commission Expires: 11/13/88.

RELATED CORRESPONDENCE



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

CERTIFICATE OF SERVICE

I, Thomas A. Schmutz, hereby certify that the foregoing Applicants' Supplemental Responses to CASE's Discovery Requests was served this 10th day of June 1988, by mailing copies thereof (unless otherwise indicated), first class mail, postage prepaid to:

*Peter B. Bloch, Esquire
Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
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

*Alan S. Rosenthal, Esq.
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Assistant Director for
Inspection Programs
Comanche Peak Project Division
U.S. Nuclear Regulatory
Commission
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Granbury, TX 76048

*/ Asterisk indicates service by hand or overnight courier.

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Thomas A. Schmutz

Dated: June 10, 1988