

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

before the  
ATOMIC SAFETY AND LICENSING BOARD

86 MAY -5 110:57  
OFFICE OF SECRETARY  
DOCKETING & RECORDS  
BRANCH

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

APPLICANTS' FURTHER SUPPLEMENTAL RESPONSE TO  
"CASE'S 8/27/85 INTERROGATORIES TO  
APPLICANTS AND REQUESTS TO PRODUCE"  
(Interrogatory No. B-2)

The Applicants hereby further supplement their answer to Interrogatory No. B-2 of the set propounded by CASE on August 27, 1985, as follows:

Interrogatory/Request No. B-2

Please provide complete documentation of all instances of confirmation of allegations of harassment and intimidation by TUGCO. (Tr. 150/7-11.)

Further Response:

Insofar as this interrogatory references statements made by Mr. Council during the public meeting of June 13, 1985 (Tr. 150/7-11): The allegation Mr. Council referred to came to his attention through the SAFETEAM program.

DS03


Mr. Council does not recall whether any specific factual details of that incident were provided to him at that time, and he has no present recollection of any of the details of the incident to which the reference was intended.

The Applicants have made available material developed by SAFETEAM regarding concerns posed by or about QC inspectors and involving incidents or circumstances occurring prior to July 1, 1984, in response to Item 6(d) of the Request for Production of Documents served by CASE under date of September 4, 1985. Consequently, documentation regarding the allegation referred to by Mr. Council during the public meeting, if it falls within the present scope of discovery on such allegations as described above, has already been provided to CASE for inspection and copying. Documentation generated prior to SAFETEAM, such as QA investigations, exit interviews, investigation reports, Ombudsman files, Hotline concerns and survey documentation has previously been made available to CASE in original and supplemental production in response to Item 3 of CASE's Eighteenth Set of Interrogatories.

Signatures

As to Answers:

I, William G. Council, being first duly sworn, do depose and say that I am Executive Vice President of Texas Utilities Generating Company, that I am familiar with statements made in the foregoing answer, that I have assisted in the preparation of the foregoing answer, and that the foregoing answer is true, except insofar as it is based on information that is available to TUGCO personnel but not within my personal knowledge, as to which I, based on such information, believe them to be true.

  
William G. Council

Sworn to before me this  
~~28th~~ day of April, 1986:

  
Notary Public

My Commission Expires: 7/5/89

JUDITH K. HARDEN

CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr. one of the attorneys for the Applicants herein, hereby certify that on April 30, 1986, I made service of the within Applicants' Further Supplemental Response to "CASE's 8/27/85 Interrogatories to Applicants and Requests to Produce" (Interrogatory No. B-2) by mailing copies thereof, postage prepaid, to:

Peter B. Bloch, Esquire  
Chairman  
Administrative Judge  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Mr. James E. Cummins  
Resident Inspector  
Comanche Peak S.E.S.  
c/o U.S. Nuclear Regulatory  
Commission  
P.O. Box 38  
Glen Rose, Texas 76043

Dr. Walter H. Jordan  
Administrative Judge  
881 W. Outer Drive  
Oak Ridge, Tennessee 37830

Mr. William L. Clements  
Docketing & Services Branch  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Chairman  
Atomic Safety and Licensing  
Appeal Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Chairman  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Stuart A. Treby, Esquire  
Office of the Executive  
Legal Director  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Mrs. Juanita Ellis  
President, CASE  
1426 S. Polk Street  
Dallas, Texas 75224

Renea Hicks, Esquire  
Assistant Attorney General  
Environmental Protection Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711

Anthony Roisman, Esquire  
Executive Director  
Trial Lawyers for Public Justice  
2000 P Street, N.W., Suite 611  
Washington, D.C. 20036

Dr. Kenneth A. McCollom  
Administrative Judge  
1107 West Knapp  
Stillwater, Oklahoma 74075

Ms. Billie Pirner Garde  
Citizens Clinic Director  
Government Accountability Project  
1901 Que Street, N.W.  
Washington, D.C. 20009

Elizabeth B. Johnson  
Administrative Judge  
Oak Ridge National Laboratory  
P.O. Box X, Building 3500  
Oak Ridge, Tennessee 37830

Nancy Williams  
Cygna Energy Services, Inc.  
101 California Street  
Suite 1000  
San Francisco, California 94111


Ellen Ginsberg, Esquire  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Joseph Gallo, Esquire  
Isham, Lincoln & Beale  
1120 Connecticut Avenue, N.W.  
Suite 840  
Washington, D.C. 20036

Mr. Lanny A. Sinkin  
Christic Institute  
1324 North Capitol Street  
Washington, D.C. 20002

Mr. Robert D. Martin  
Regional Administrator,  
Region IV  
U.S. Nuclear Regulatory Commission  
Suite 1000  
611 Ryan Plaza Drive  
Arlington, Texas 76011

Geary S. Mizuno, Esquire  
Office of the Executive  
Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



---

Thomas G. Dignan, Jr.