

RELATED CORRESPONDENCE

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USNRC

BEFORE THE
UNITED STATES
NUCLEAR REGULATORY COMMISSION **86 JUL -9 11:40**

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

TEXAS UTILITIES GENERATING COMPANY,
et al.

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

)
)
) Dkt. Nos. 50-445-OL
) 50-446-OL
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)

INTERROGATORIES AND REQUEST FOR DOCUMENTS
(July 2, 1986)

Pursuant to the Rules of Practice, Citizens Association for Sound Energy (CASE) requests responses to the questions below and production of the sought after documents.

Instructions

1. Each interrogatory or document request should include all pertinent information known to Applicants, their officers, directors, or employees, their agents, advisors, or counsel. "Employees" is to be construed in the broad sense of the word, including specifically Brown & Root, Gibbs & Hill, Ebasco, Cygna, Stone and Webster, Evaluation Research Corporation, TERA, any consultants, subcontractors, and anyone else performing work or services on behalf of the Applicants or their agents or subcontractors.

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2. Each answer should indicate whether it is based on the personal knowledge of the person attesting to the answer and, if not, on whose personal knowledge it is based.

3. The term "documents" shall be construed in the broad sense of the word and shall include any writings, drawings, graphs, charts, photographs, reports, studies, audits, slides, internal memoranda, informal notes, handwritten notes, tape recordings, procedures, specifications, calculations, analyses, and any other data compilations from which information can be obtained.

4. As to each document provided, applicants shall consider that providing the document constitutes an admission of its authenticity or, pursuant to §2.742(b), the basis for refusing to so admit.

5. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.

6. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR §2.740(e) and the past directives of the Licensing Board. Supplementation shall be made at least every two months to avoid resubmittal of these interrogatories.

7. For each item supplied in response to a request for documents, identify it by the specific question number to which it is a response. If the item is excerpted from a document, identify it also by the name of the document.

8. The following interrogatories and document requests should be answered in light of the interpretations,

clarifications, and guidance expressed in the Board's Memorandum and Order of June 27, 1986 (Dkt. No. 50-445-CPA).

Interrogatories

1. Identify all documents upon which Applicants intend to rely in the construction permit extension proceeding (Dkt. No. 50-445-CPA) to demonstrate that there was a "good cause" for the delay in completion of construction of Unit 1.

2. Identify all audits, reviews, diagnoses, evaluations, consultant reports, in-house audits, or other reports which Applicants received from the beginning of construction to the present assessing, analyzing, commenting on, discussing, or offering an opinion on the plant's construction, procedures, compliance with industry or agency standards, or management style or competence. (This should include all source documents listed in Appendix B to CASE's Request for Imposition of Fine, Suspension of Construction Activities, and Hearing on Application to Renew Construction Permit, 1/31/86.)

3. When did Applicants first receive notice of the issues identified by the NRC's TRT reports and SSERs, and in what form did that notice come (i.e., NCR, IR, audit report, memorandum, consultant's report, etc.).

4. For each item identified in Interrog. 3, identify what response was taken to the problem and by whom.

5. If the answer to Interrog. 4 is that no action was taken, explain the reason that no action was taken. If that reason is because Applicants relied on a "second opinion,"

identify the individuals or organizations who provided that judgment.

6. Identify how each "finding" identified in Interrog. 3 was integrated into consideration of the subsequent findings by others. (For example, how were the findings by the NRC in 1978 and 1979 integrated into Applicants' response to the findings by the Management Analysis Corporation (MAC)?)

7. State your position on the following, including all evidence and reasoning upon which you rely with respect to each position:

- a. What delayed completion of construction of Unit 1 past August 1, 1985?
- b. Why did that delay occur?
- c. Who was responsible for that delay?
- d. Do you believe you had a valid business purpose for the delay and, if so, what was it?
- e. Identify each person who participated in the decision-making process that led to the delay and describe in detail their role.

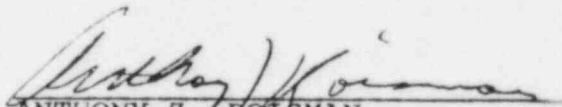
Request for Documents

CASE requests that Applicant produce the original or copies of all documents in TUEC's custody, possession, or control that refer or relate in any way to documents identified in or used for answering Interrogatories 1 through 7 above.

If a document has already been supplied by TUEC to CASE in another proceeding, TUEC can identify with particularity the

location of the document or answer by including the name of the document, page and line number, in which docket the document was produced, and the date it was produced. This does not apply if the answer previously provided was an objection. In that case, TUEC must reassert the objection as applicable to this proceeding.

Respectfully submitted,


ANTHONY Z. ROISMAN

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Dated: July 2, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of CASE's INTERROGATORIES AND REQUEST FOR DOCUMENTS (July 2, 1986) have been sent to the persons listed below this 2nd day of July 1986 by: Express mail where indicated by *; Hand-delivery where indicated by **; and First Class Mail unless otherwise indicated.

Administrative Judge Peter B. Bloch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

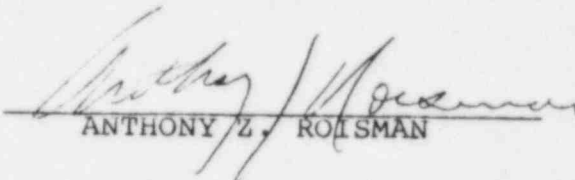
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