CASSN. FOR SOUND ENERGY)

1426 S. Polk Dallas, Texas 75224

214/946-9446

50-445

September 18, 1986

Mr. Charles M. Trammell, Project Manager PWR Project Directorate No. 5 Division of PWR Licensing-A U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Charlie:

Subject: Proposed FSAR revisions resulting from Stone & Webster piping requalification program (discussed at 8/28/86 NRC Staff/ Applicants meeting held in Bethesda)

Yesterday I received a copy of your September 9, 1986, Summary of Meeting Held on August 28, 1986 to Discuss Comanche Peak FSAR Updates for Stone & Webster Piping Requalification Program, in which you stated (last pargraph):

"TUGCO will submit a formal proposed FSAR change for staff review by September 12, 1986, and requested that staff review be completed as soon as possible since staff acceptance would be a critical path item for Unit 1 pipe design."

CASE is in the process of reviewing the 8/28/86 meeting transcript and Applicants' 9/12/86 advanced copy of FSAR changes scheduled for a future FSAR amendment, and we will also be carefully reviewing the final proposed FSAR changes when they are received.

Our position is that these extensive FSAR changes constitute an amendment to the construction permit, that this involves a significant hazards consideration, that it must be noticed in the Federal Register, and that an opportunity for a hearing must be provided.

As I stated, we are currently reviewing this information to determine whether or not we want to ask for a separate hearing. However, we wanted to let you know right away of our position.

Sincerely,

CASE (Citizens Association for Sound Energy)

Manita Ellis

(Mrs.) Juanita Ellis President

cc: Service List

8609250390 860918 PDR ADOCK 05000445 A PDR