Filed: March 2, 1987

BOCKETED

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

'87 MAR -6 A11:14

before the

ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY BOCKETING & SERVICE BRANCH

In the Matter of

TEXAS UTILITIES GENERATING COMPANY, et al.

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

Docket Nos. 50-445-OL 50-446-OL

(Application for an Operating License)

## MOTION TO COMPEL ANSWERS TO INTERROGATORIES SETS 1987-1,2,3

On January 29, 1987, Applicants served Interrogatories
Sets 1987-1,2,3 on CASE. Responses were due on February 17,
1987. CASE has failed to file answers to any of the
interrogatories. As the date for CASE to respond has
passed and as the matters asserted in the motion for a
protective order are without legal basis, Applicants,
pursuant to 10 CFR § 2.740(f), move this Board to issue an
order compelling CASE to answer.

TEXAS UTILITIES ELECTRIC COMPANY For the Owners of CPSES

By its attorneys,

8703090331 870302 PDR ADOCK 05000445 G PDR Thomas G. Dignan, Jr. R. K. Gad III
William S. Eggeling
Kathryn A. Selleck
Ropes & Gray
225 Franklin Street
Boston, MA 02110
(617) 423-6100

CASE has filed a motion for a protective order, to which Applicants are responding contemporaneously herewith.

## CERTIFICATE OF SERVICE

'87 MAR -6 A11:14

I, R. K. Gad III, one of the attorneys for the Applicants herein, hereby certify that on March 2, 1987, \*\* made service of the within document by mailing copies thereof, postage prepaid, to:

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

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

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

Lawrence J. Chandler, Esquire Mrs. Juanita Ellis Office of the Executive Legal Director 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

Ms. Billie Pirner Garde Midwest Office 3424 N. Marcos Lane Appleton, WI 54911

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

President, CASE 1426 S. Polk Street Dallas, Texas 75224 Renea Hicks, Esquire Assistant Attorney General Environmental Protection Division Board Panel 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

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 P. . Box 12548, Capitol Station U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> 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, Esq. Office of the Executive Legal Director U.S. Nuclear Regulatory Commission Washington, D.C. 20555