

BEFORE THE
UNITED STATES
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'86 SEP 22 P1:12

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)

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)
) Dkt. Nos. 50-445-OL
) 50-446-OL
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NOTICE OF DEPOSITION

Intervenor CASE, pursuant to Rule 30(b) of the Federal Rules of Civil Procedure and 10 CFR §§2.720 and 740a, hereby provides notice that, immediately following the deposition of Michael D. Spence, intervenor will take the deposition upon oral examination of William G. Council. The deposition will be held in Dallas, Texas, at the offices of Frederick Baron and Associates, Suite 1400, Dallas Federal Savings Building, 8333 Douglas Avenue, Dallas 75225.

The deposition will continue from day to day until completed, subject to such adjournment as may be agreed upon by counsel.

Mr. Council is also directed to bring to the deposition, as indicated by the enclosed subpoena, all documents in his custody or possession (or under his control) that refer or relate in any way to:

(1) The interface and management responsibilities for the CPRF activities of Mr. Council and his staff.

(2) The history and development of the CPRT through its revisions to the present.

(3) The process through which FUEC implements 10 CFR Part 50, Appendix B, responsibilities in regard to CPRT activities.

(4) The safety significance evaluation process.

(5) The collective evaluation program.

(6) The process by which the CPSES project tracks and trends all identified deficiencies, deviations, design observations, or "unsats" on ISAP checklists.

(7) The removal of Monty Wise as Electrical Review Team Leader.

(8) The selection and evaluation process of ERC as the third-party reviewer.

(9) Any other matters with respect to the CPRT program adequacy, including the Region IV NRC and TRT involvement in the development and implementation of the program.

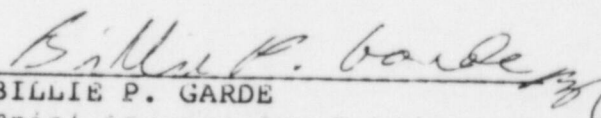
"Document" shall mean every instrument or device by which, through which, or on which information has been recorded, including those reflecting meetings, discussions, or conversations; notes; letters; drawings; files; graphs;; charts; maps; photographs; deeds; studies; data sheets; notebooks; books; appointment calendars; telephone bills; telephone messages; receipts; vouchers; minutes of meetings; pamphlets; computations; calculations; accounting(s); financial statements; voice recordings; computer printouts; and any device or medium on which or through which information of any type is transmitted, recorded, or preserved. The term "document" also means every

copy of a document when such copy is not an identical duplicate of the original.

Counsel for intervenor will ask Mr. Council to identify each document produced in response to the enclosed subpoena and counsel may examine Mr. Council concerning the contents of the documents produced.

Counsel for intervenor will examine Mr. Council on all matters relevant to the adequacy of the CPRT and the above mentioned matters and all explanations given by Applicants.

Respectfully submitted,


BILLIE P. GARDE
Trial Lawyers for Public Justice
3424 North Marcos Lane
Appleton, WI 54911

Counsel for CASE

Dated: September 18, 1980