

BEFORE THE
UNITED STATES
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'86 SEP 22 P1:12

Before the Atomic Safety and Licensing Board

In the Matter of)
)
TEXAS UTILITIES GENERATING COMPANY,)
 et al.)
)
(Comanche Peak Steam Electric)
 Station, units 1 and 2))

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

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 John Beck, intervenor will take the deposition upon oral examination of John Hansel. 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. Hansel 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 responsibilities and tasks Mr. Hansel has now and has had regarding the development and implementation of the CPRT program.

(2) The differences between the Comanche Peak reinspection program and the Braidwood reinspection program, including an explanation of how the implementation flaws identified in the Braidwood program were corrected in the Comanche Peak program.

(3) The interface between the QA/QC Team and the CPSES Project.

(4) How the nonhomogenous work activities were established.

(5) The October 1985 "stop work" order and subsequent "backfit" activities resulting therefrom.

(6) The backfit of the CPRT to comport with the NRC comments in SSER #13.

(7) The quality or construction program, including the ISAP VII.C. program elements that resolve the SSER #11 Appendix P concerns.

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

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

(10) The safety significance evaluation process.

(11) The collective evaluation program.

(12) The Senior Review Team decision process and the process by which it controls the CPRT.

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

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

(15) Any other matters with respect to the CPRT program

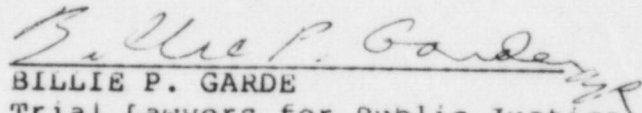
adequacy, including the Region IV NRC and TRT involvement in the development and implementation of the program.

"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. Hansel to identify each document produced in response to the enclosed subpoena and counsel may examine Mr. Hansel concerning the contents of the documents produced.

Counsel for intervenor will examine Mr. Hansel 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
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Appleton, WI 54911

Counsel for CASE

Dated: September 18, 1986