

ROCKETED
SEP 26, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 SEP 28 A11:23

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

CENTRE OF SECRETARIAL
& SERVICE
BRANCH

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

Docket Nos. 50-445-2
and 50-446-2 06-2

CASE'S MOTION FOR PRODUCTION OF DOCUMENTS TO
THE NRC STAFF REGARDING PROPOSED TESTIMONY OF EG&G */

1. Please produce a copy of all written communications**/
between any person at the NRC and any of the persons:
 - a. who worked on developing the scope of work and
goals of the contract which resulted in the EG&G report;
 - b. who worked on the preparation of the report in any
capacity;

*/ All requests for documents include documents in the possession of NRC, its contractor (EG&G) and any persons employed by its contractor in conjunction with preparation of the EG&G report.

**/ Written communications as used in this Motion include, but are not limited to, notes of meetings or phone calls, draft reports and/or comments thereon, handwritten notes, word processor diskettes and tape recordings if the material contained on the diskettes or tape is not in hard copy, computer programs and any printouts used in conjunction with those programs.

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c. who have been or will be consulted by the NRC for purposes of analyzing the report and preparing for or submitting testimony with respect to the report.

2. Please produce a copy of all written communications between any NRC employees regarding the development of the contract for the EG&G report, the progress on completing the work, the draft and final work products and the subject matter of the report itself. Also produce any drafts of the EG&G report or proposed changes or modifications of the EG&G report prepared by any NRC employee, any NRC contractor, or any employee of any NRC contractor.

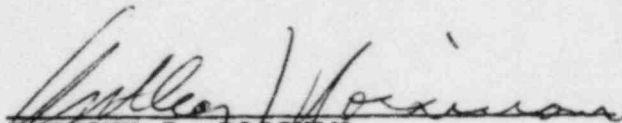
3. Please produce a copy of all materials examined or relied upon in formulating the views expressed in the EG&G report. To the extent any material is already a part of the record of this case an identification of the material, where it appears in the record and for what portion of the report it was relied upon will be sufficient.

4. With respect to the EG&G report please produce a copy of all written notes, drafts, calculations, or any other documents prepared by any person who participated in the preparation of the EG&G report or participated in the preparation of any of the materials examined or relied upon in preparing the report.

5. Identify by name, address and phone number, and provide a curriculum vita for every person who participated in any way in the preparation of the EG&G report and indicate what work was done by them.

6. Please produce a copy of all written communications between any NRC employee or any EG&G employee or any person used by the NRC or EG&G for the purpose of working on the EG&G report or the development of data for the report and any other person with respect to the report or its subject matter.

Respectfully submitted,



ANTHONY Z. ROISMAN
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DOCKETED
USNRC
September 26, 1984

'84 SEP 28 11:24

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
ADMINISTRATIVE & SERVICE
BRANCH

In the Matter of)
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TEXAS UTILITIES GENERATING)
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(Comanche Peak Steam Electric)
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Docket Nos. 50-445-2
and 50-446-2

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of CASE's Motion For Production of Documents to the NRC Staff Regarding Proposed Testimony of EG&G have been sent to the names listed below this 26th day of September, 1984, by: Express mail where indicated by *; Hand-delivery where indicated by **; and First Class Mail unless otherwise indicated.

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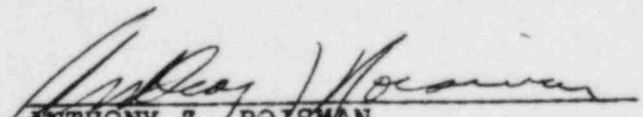
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