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RELATED CORRESPONDENCE

Filed: January 29, 1987

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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before the
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
TEXAS UTILITIES ELECTRIC)	Docket Nos. 50-445- <i>OL</i>
COMPANY et al.)	50-446
(Comanche Peak Steam Electric)	(Application for an
Station, Units 1 and 2))	Operating License)
)	

APPLICANTS' INTERROGATORIES TO CASE
(Set No. 1987-1)

Pursuant to 10 C.F.R. sec. 2.740 ff, the Applicants hereby propound the following interrogatories to "Citizens' Association for Sound Energy," ("CASE").

I-1. Does CASE contend that, by reason of any asserted lack of "independence" (however CASE may choose to define that term), the CPRT Program Plan fails in any respect to comply with any statute, regulation or rule applicable to it? (If the answer to this Interrogatory is an unqualified negative, you may proceed to II-1).

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I-2. Identify (by section, appendix, action plan and page number) each specific portion of the CPRT Program Plan that CASE contends is non-compliant.

I-3. Specify separately for each specific portion of the CPRT Program Plan required to be specified by Interrogatory I-2, each statute, regulation or rule with which CASE contends each portion is non-compliant.

I-4. State the definition of "independence" employed by CASE in answering this set of interrogatories.

I-5. State, separately for each portion of the CPRT Program Plan required to be identified in response to Interrogatory I-2 all of the reasons why CASE contends that portion of the Program Plan lacks independence?

I-6. State, separately for each statute, regulation or rule required to be identified in response to Interrogatory I-3, all of the reasons why CASE contends each statute, regulation or rule requires "independence" as CASE has defined the term.

I-7. Specify in detail each and every change to the CPRT Program Plan that CASE contends is required to be made in order for the Program Plan to be compliant.

II-1. Does CASE contend that, by reason of any asserted lack of "independence" the CPRT Program Plan is in any respect inadequate to accomplish its stated objective? (If

the answer to this Interrogatory is an unqualified negative, you may proceed to III-1).

II-2. Identify (by section, appendix, action plan and page number) each specific portion of the CPRT Program Plan that CASE contends is inadequate to accomplish its stated objective due to the asserted lack of independence?

II-3. State, separately for each portion of the CPRT Program Plan required to be identified in response to Interrogatory II-2, all of the reasons why CASE contends that portion of the Program Plan lacks independence?

II-4. State, separately for each portion of the Program Plan required to be identified by Interrogatory II-2, all of the reasons why CASE contends that accomplishment of the CPRT Program Plan objective is possible if, and only if, the Program Plan incorporates each aspect of "independence" as CASE has defined the term.

III-1. Does CASE contend that any program employed at any other nuclear facility establishes a precedent for either the requirement or the adoption of "independence" as CASE has defined the term? (If your answer to this Interrogatory is an unqualified negative you may proceed to IV-1).

III-2. Identify by program name (if available, otherwise by program description) and facility name, each such program that CASE contends establishes a precedent for

either the requirement or the adoption of "independence" as CASE has defined the term.

III-3. Identify each source of information upon which CASE relies for its knowledge, information or belief about the nature of each such program that CASE contends establishes a precedent for either the requirement or the adoption of "independence" as CASE has defined the term.

IV-1. Does CASE intend to offer the testimony of any expert on the matters covered by these interrogatories? If so;

(i) Identify each Expert;

(ii) State the subject matter on which each expert is expected to testify;

(iii) State the substance of the facts and opinions which each expert is expected to testify to; and

(iv) Provide a summary of the grounds for each opinion to which each expert is expected to testify.

By their attorneys,



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