

March 2, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
HOUSTON LIGHTING AND POWER COMPANY.)
ET AL.)
(South Texas Project, Units 1 and 2))

Docket Nos. 50-498
50-499

IDENTIFICATION OF STAFF
WITNESSES AND SUBSTANCE OF TESTIMONY

By Board Order dated December 2, 1980, the parties were directed to identify witnesses, including the substance of testimony, on or before March 2, 1981. Pursuant to that Order, the Staff hereby submits the following list of witnesses and the subject matter each will address.

A) Panel 1

- William C. Seidle, Chief, Reactor Construction and Engineering Support Branch (RC&ESB), Region IV.
- William A. Crossman, Chief, Projects Section, RC&ESB, Region IV.
- William G. Hubacek, Reactor Inspector, Region IV.
- Robert G. Taylor, Reactor Inspector, Region IV.
- H. Shannon Phillips, Resident Reactor Inspector, South Texas Project.

Panel 1 will offer testimony relevant to the inspection and enforcement history of construction activity at the South Texas Project up to I&E Report 79-19 and the Staff Show Cause Order issued April 30, 1980. Investigative findings which led to the formation of the special inspection team which drafted I&E Report 79-19 will be stressed. In addition, allegations set forth in CCANP/CEU Contentions 1 and 2 will be addressed in part by this Panel's testimony.

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B) Panel 2

William C. Seidle, Chief, RC&ESB, Region IV.
Robert E. Shewmaker, Senior Construction Specialist.
H. Shannon Phillips, Resident Reactor Inspector, South Texas
Project.
D. W. Hayes, Chief, Engineering Support Section, Region III.

Panel 2 will offer testimony relevant to the formation of the special inspection team which prepared I&E Report 79-19, the manner in which the investigation was conducted, the findings of that investigation and the enforcement actions chosen as a result of those findings. Testimony will stress the items set forth in the Staff Show Cause Order of April 30, 1980, and the Notice of Violation accompanying the Order.

C) Panel 3

William C. Seidle, Chief, RC&ESB, Region IV.
William A. Crossman, Chief, Projects Section, RC&ESB, Region IV.
H. Shannon Phillips, Resident Reactor Inspector, South Texas
Project.
William G. Hubarek, Reactor Inspector, Region IV.
Ramon E. Hall, Chief, Engineering Support Section, RC&ESB,
Region IV.

Panel 3 will offer testimony relevant to the corrective actions proposed by the Applicant as a result of the Show Cause Order and the Notice of Violation. In addition, Staff follow-up inspection activity will be addressed for each item cited in the Show Cause Order and the Notice of Violation to ensure proposed corrective actions have been implemented and steps have been taken to prevent recurrence of similar problems. The Applicant's inspection and enforcement history relative to the construction activity at the South Texas Project subsequent to the Show Cause Order will also be the subject of testimony.

D) John W. Gilray, Quality Assurance Engineer

Mr. Gilray will offer testimony relevant to whether the Applicant's current QA/QC organization, which has been implemented for the balance of the construction activity at the South Texas Project, meets the requirements of 10 C.F.R. Part 50, Appendix B.

E) Lawrence P. Crocker, Senior Nuclear Engineer (Management Systems)
Frederick R. Allenspach, Nuclear Engineer (Management Systems)

Panel 4 will offer testimony relevant to the proposed management organization for the operations phase of the South Texas Project. This Panel will also testify to the issue of managerial competence based on current organizational plans of the Applicant for operations. The Applicant's current plan for transition from construction activity to start-up and operations will also be addressed. In addition, managerial attitude, as evidenced by interviews with Applicant's management, will be covered by this Panel.

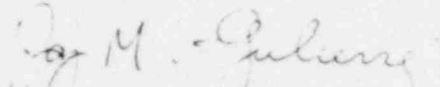
F) John G. Spraul, Senior Quality Assurance Engineer

The testimony of Mr. Spraul will be relevant to whether the Applicant's proposed Quality Assurance Program for Operation of the South Texas Project meets the requirements of 10 C.F.R. Part 50, Appendix B.

Lastly, it is envisioned that all Staff testimony, to the extent it evidences a course of conduct by the Applicant from which corporate

character and competence can be inferred, will be relevant to those issues.

Respectfully submitted,



Jay M. Gutierrez
Counsel for NRC Staff

Dated at Bethesda, Maryland,
this 2nd day of March, 1981.

