

3/23/81

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

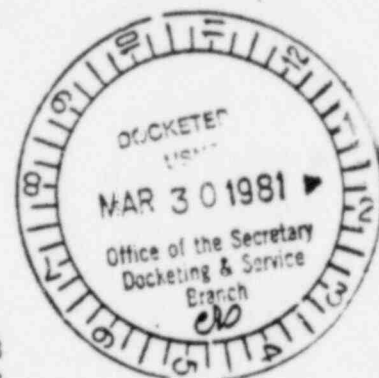
In the Matter of §
§
HOUSTON LIGHTING AND POWER § Docket Nos. 50-498
COMPANY, ET AL § 50-499
§
(South Texas Project, Units 1 and 2 §

CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC.
SUPPLEMENTAL ANSWERS TO APPLICANT INTERROGATORIES

On March 16, 1981, CCANP delivered to Applicants a document entitled ANSWERS OF MR. LANNY SINKIN TO QUESTIONS FROM APPLICANTS. In those answers, Item No. 2 requested the names of CCANP members who assisted Mr. Sinkin in answering Applicant interrogatories. Since the hearing, Mr. Sinkin has reviewed the file of working notes from which the answers in question were prepared. Based on this review, Mr. Sinkin now supplements his answer to state:

"In answering the interrogatories, I was assisted by a Mr. Patrick O'Mara. Mr. O'Mara was not a member of CCANP to the best of my recollection, but did assist me by referencing information already in our possession to the Applicants' questions. Mr. O'Mara was not involved in collecting any information, only in organizing information already on hand."

On March 17, 1981, CCANP representatives met with Applicant representative to discuss additional information sought by Applicants in response to Applicant's second interrogatories. Below are the answers sought, including answers potentially covered by the protective order entered by the Board on March 18, 1981.



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2.(b) Identify each person contacted by CCANP during its participation in the above referenced investigation. [FBI]

"The only name I can recall which was provided by CCANP to the FBI for purposes of their investigation and the only person so provided with information related to Contentions 1 and 2 or whose questioning is likely to lead to information on Contentions 1 and 2 is Daniel E. Swayze."

5.(c) Has CCANP spoken with any official of the NRC or any other person concerning any activity of HL&P and/or its contractor for the STP project which CCANP regards as part of "extensive, pervasive, and willful violations of 10 C.F.R, Part 50." Identify each such person and describe the substance of each conversation.

"During and after the Order to Show Cause investigation, CCANP discussed such violations with Mr. Victor Stello and members of his staff whose names I do not recall and with Mr. James Lieberman and members of the OELD staff whose names I do not recall. The essence of these conversations was to explain the allegations in CCANP's pleadings and to seek information on when the investigation would conclude and whether the allegations were being substantiated.

The only non-NRC person with whom CCANP discussed what CCANP consider to be extensive, pervasive, and willful violations of 10 C.F.R., Part 50 who has information related to Contentions 1 and 2 or whose questioning is likely to lead to information on Contentions 1 and 2 is Daniel E. Swayze. The substance of the conversations is embodied in Contentions 1

and 2 as accepted by the Board; answers of CCANP to Applicants' first set of interrogatories #'s 3-5 and 9-38; and answers of CCANP to Applicants' second set of interrogatories #'s 2-5, 9-17, 19, 20, 22-25, 28, 29, 31-37, 39-45, 46(d)."

6.(b) Identify the source of the information in (a) above [facts or occurrences contributing to "a climate of fear at the construction site."]

"Daniel E. Swayze"

6.(c) Names of persons who refused to provide information for fear of losing his or her job.

CCANP was contacted by a person who stated he worked in the electrical department at STNP and that there was very poor workmanship regarding holders of high voltage lines. Said person did finally agree to a meeting but failed to appear. CCANP attempted to get this person to agree to a meeting, but this person expressed fear for his job with Brown and Root, Inc.. Subsequent attempts by both CCANP and CEU to locate this person failed. It is possible the person used an assumed name, but in case the name given is the real name, this name will be provided under separate cover for inclusion under the protective order.

The only other persons relevant to this interrogatory are persons whom Mrs. Buchorn talked to. Other than people named on the 1981 tape given to I&E, CCANP cannot recall any names of persons who expressed this sentiment."

40. Identify exactly that portion of the NRC Regulations and/or South Texas Project Quality Assurance Procedures which CCANP

asserts requires that the "original designer" approve design changes.

"CCANP makes no such assertion. CCANP knows of no such NRC or STNP regulation or procedure."

45.(a) Identify specifically each and every instance of "intimidation" or "abuse" which CCANP asserts was "endemic".

"CCANP references answers to Applicants' first set of interrogatories #'s 32-37; answers to Applicants' second set of interrogatories 42-44; and the Order to Show Cause."

46.(c) Identify each instance in which CCANP asserts that "pervasive construction errors" caused "tension between construction workers and inspectors."

"Answers to Applicants' first interrogatories #37; Order to Show Cause page 49 and supportive investigative findings."

46.(e) Produce each document upon which CCANP relies for the conclusion set forth in (c) above.

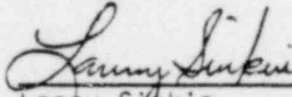
"Answers to Applicants' first interrogatories Exhibit O and P; Answers to Applicants' second interrogatories Exhibit 4; Order to Show Cause."

47. Identify each and every construction record, other than "pour cards" referenced in Contention 1, Paragraph d., which you assert has been falsified.

"At the March 17, 1981 meeting with Applicant representatives, CCANP representatives recalled another allegation of falsification. A letter recounting that allegation, the source of the allegation, and the alleged falsifiers has been sent to NRC I&E Washington for investigation. Rather than compromise

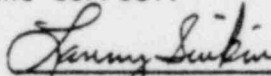
the investigation, CCANP awaits I&E determination of the validity of the charge."

As to the names on the tape from Mr. Swayze's attorneys, I have sent Mr. Swayze a letter requesting his permission to release the tape to the NRC. If such permission is received, I will review the tape to see if there are matters related to Contentions 1 and 2 or where questioning of the inspectors is likely to lead to information relevant to Contentions 1 and 2. If there is such information or the likelihood of such information being developed, I will provide the names to the Applicants either under the protective order or in the witness list."

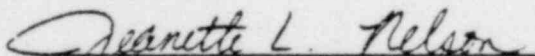

Lanny Sinkin

STATE OF TEXAS §
 §
COUNTY OF BEXAR §

BEFORE ME, the undersigned authority, on this day personally appeared Lanny Sinkin, who on his oath states that he has read the foregoing CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. SUPPLEMENTAL ANSWERS TO APPLICANT INTERROGATORIES and knows the same to be true and correct.


Lanny Sinkin

SUBSCRIBED AND SWORN TO before me by LANNY SINKIN on this 23rd day of March, 1981.


Notary Public in and for
Bexar County, Texas

My Commission expires:

November 7, 1984

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been served on the following individuals and entities by deposit in the U.S. Mail, first class, postage prepaid on this 25th day of March, 1981.

Kim Eastman
Kim Eastman

Charles Bechhoefer, Esq.
Chairman, Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James C. Lamb
313 Woodhaven Road
Chapel Hill, North Carolina 27514

Mr. Ernest C. Hill
Lawrence Livermore Laboratory
University of California
P.O. Box 809, L-123
Livermore, Calif. 94550

Edwin J. Reis
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Brian E. Berwick, Esq.
Assistant Attorney General for
the State of Texas
5th floor, Reagan Bldg.
Austin, Tx. 78711

Mrs. Peggy Buchorn
Executive Director, CEU
Route 1, Box 1684
Brazoria, Tx. 77422

Mr. Jack Newman
Lowenstein, Newman, Reis, & Axelrad
1025 Connecticut Ave. NW
Washington, D.C. 20036

Docketing and Service Section (7)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Panel (5)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas B. Hudson, Jr. Esq.
Baker & Botts
3000 One Shell Plaza
Houston, Tx. 77002

