

UNITED STATES OF AMERICA

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USNRC

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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OFFICE OF SECRETARY
REGULATING & SERVICE
BRANCH

In the Matter of)

 HOUSTON LIGHTING AND POWER CO.)
 (South Texas Project, Units 1)
 and 2))
Docket No. 50-498
50-499

CEU AND CCANP ADDITIONAL INTERROGATORIES TO
HOUSTON LIGHTING AND POWER COMPANY

On Friday, November 6, 1981, CEU and CCANP hand delivered a set of joint interrogatories to Houston Lighting and Power Company pursuant to the Board's Order of October 30, 1981. Although CCANP's written suggestions for interrogatories had been sent by Express Mail on Thursday morning, they did not arrive in the office of CEU's Counsel before close of business on Friday. CEU has examined those suggestions with a view to eliminating any duplicative or overlapping questions so as to minimize the burden on HL&P. CEU is serving these interrogatories by hand on Monday, November 9, which is equivalent to their having been served by CCANP by Express Mail on Friday, November 6.

INTERROGATORIES

15. Please provide a detailed daily schedule of how design and engineering work will be performed at the South Texas project for the period November 6, 1981, to March 1, 1982. If a daily schedule is not available, please provide the most complete

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schedule in HL&P's possession or of which it is aware. This question covers all aspects of design and engineering work, including site engineering and responses to questions raised by construction and QA/QC. In providing this schedule, please identify the company that will perform the design or engineering work and the specific or expected approximate date of any transsitions from one company to another.

16. Please state the basis for Houston Lighting and Power Company's decision to terminate Brown and Root from the design, engineering, construction management, construction, quality assurance, and quality control aspects of the South Texas Project. Provide a specific explanation in each case, and provide all documents in HL&P's possession or available to HL&P concerning the decision to terminate Brown and Root.

17. Please state the conditions under which Brown and Root is authorized to hire additional personnel for work on the South Texas Project. In addition, please identify all areas of the Project for which either HL&P or Brown and Root has instituted a hiring freeze, state how long each such freeze has been in place, and the conditions under which it will be lifted or under which exceptions may be made. Please provide all facts on which this answer is based and identify and provide copies of all documents related to or considered in providing this answer.

18. Please identify and restate all statements, whether oral or written, made to Brown and Root employees or prospective

employees since the Quadrex Report was commissioned concerning the benefits of employment with Brown and Root at the South Texas Project, the likely or promised tenure of their employment with Brown and Root (both at STP and elsewhere), or the extent of job security for those employees at STP, whether with Brown and Root or some other company. Please provide copies of all documents in which these statements were made or in which these statements or job tenure or employee morale issues were discussed within HL&P or Brown and Root.

19. When were the final Quadrex Report and any drafts of the report received by HL&P? When did HL&P first become aware of the likely conclusions of the Quadrex Report?

20. When was the Quadrex Report first received by Brown and Root?

21. Please list, with an identification for each item as safetyrelated or nonsafetyrelated at the time of performance, all construction items performed:

- a. Since HL&P received the Quadrex Report.
- b. Since the date HL&P notified Brown and Root of HL&P's intent to terminate Brown and Root's responsibilities for any aspect of the South Texas Project.

22. Please list:

- a. All items of construction approved by the Nuclear Regulatory Commission for performance after the NRC received the Quadrex Report.

b. The date each item was performed or the status of performance if still pending.

23. Please state:

a. The two specific findings in the Quadrex Report that were reported by HL&P to the NRC pursuant to 10 CFR §50.55(e).

b. The identities of all persons who participated in the decision making process that led to reporting these two items.

c. The identities of the persons who participated in the decision making process that led to the release of the Quadrex Report to the Board and Intervenor representatives.

24. Please identify all measures taken to protect partially completed work at the South Texas Project during previous periods when work has been halted pursuant to stop work orders issued by the NRC, HL&P, or Brown and Root.

25.. Please list any studies, reports, evaluations, or similar documents concerning possible deficiencies in either the construction or QA/QC programs at the South Texas Project prepared by the Bechtel Corporation or by any other entity. Please provide copies of any such documents not previously provided.

Respectfully submitted,

William S. Jordan, III

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For Citizens for Equitable
Utilities

Lanny Sinkin

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For Citizens Concerned About
Nuclear Power

Dated: November 9, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
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HOUSTON LIGHTING AND POWER)	Docket Nos. 50-498 OL
COMPANY, et al.,)	50-499 OL
)	
(South Texas Project,)	
Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of Citizens for Equitable Utilities and Concerned Citizens about Nuclear Power Additional Interrogatories to Houston Lighting and Power Company dated November 9, 1981, have been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid on This 9th day of November, 1981.

Charles Bechhoefer, Esq.
Chief Administrative Judge
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