

United States of America

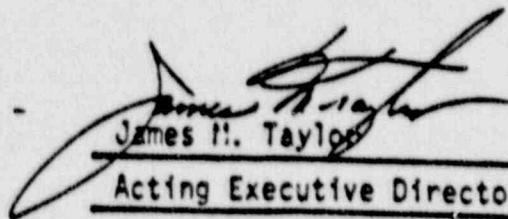
NUCLEAR REGULATORY COMMISSION

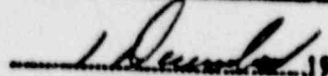
In the matter of: Houston Lighting and Power Company

DOCKET NO. (s) 50-498
50-499

TO John Corder
Route 4, Box 4158
Brazoria, TX 77422

Pursuant to Section 161c of the Atomic Energy Act of 1954, as amended, 42 U.S.C. Section 2201(c), YOU ARE HEREBY COMMANDED to appear at Room 129 of the Hilton Hotel, 925 Highway 332 West, Lake Jackson, TX 77566 on the day of December 19, 1989 at 9 o'clock a.m. to continue as necessary for the purposes of testifying before NRC personnel regarding alleged nuclear safety concerns that you have as referred to in a letter dated September 28, 1989 submitted by your attorney, Ms. Billie Pirner Garde, on your behalf to Mr. Dennis Crutchfield of the Nuclear Regulatory Commission.


James H. Taylor
Acting Executive Director for Operations


1989

ATTORNEY FOR
Nuclear Regulatory Commission
Richard K. Hoefling

TELEPHONE (301) 492-1690

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On motion made within ten (10) days of receipt of the subpoena and on notice to the party at whose instance the subpoena was issued, the Commission may (1) quash or modify the subpoena if it is unreasonable, or (2) condition denial of the motion on just and reasonable terms. Such motion should be directed to the Secretary of the Commission, Washington, D.C. 20555.

Robinson,
Robinson, Peterson, Berk,
Rudolph, Cross & Garde

Mary Lou Robinson
Nils Jean Robinson
John C. Peterson
Avram D. Berk
Michael Rudolph
Dan Cross
Billie Firner Garde

Attorneys at Law
108 East College Avenue
Appleton, Wisconsin 54911
(414) 781-1817
Green Bay 494-9600
Fax 780-8841

September 28, 1989,

Dennis Crutchfield
Associate Director for Special Projects
Office of Nuclear Reactor Regulations
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: John Corder

Dear Mr. Crutchfield,

I have been asked by Mr. John Corder to respond to your September 5, 1989, letter to Attorney Robert Rice. Mr. Corder advises me that he does have concerns that he believes the NRC has not evaluated, however, because his experience with the agency's pursuit of concerns has not been adequate, he has requested that I negotiate the terms under which he will participate further in the NRC efforts:

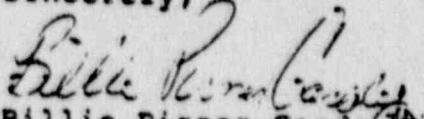
Those terms are:

1. Any expenses he incurs in pursuit of those concerns will be reimbursed by the NRC.
2. The previous site inspection trip he had with Jose Calvo will be discussed.
3. The NRC will timely process the enclosed Freedom of Information Request.
4. Mr. Corder be provided the opportunity for an NRC escorted inspection trip of STP.
5. Mr. Corder be permitted to have counsel or a representative present during his NRC interview and the site inspection.
6. The NRC conduct an investigation of his claims of harassment and discrimination in violation of 10 C.F.R. 50.7.

7. The NRC provide Mr. Corder the protection of a legal subpoena for his information to protect him from potential breach of contract action by Bechtel for violating the terms of his settlement.

Please provide a response to these conditions at your earliest convenience.

Sincerely,


Billie Pirner Garde

Encl. a/s
BPG/emh
jc2

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September 28, 1989

FREEDOM OF INFORMATION ACT REQUEST

Director
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20210

TO WHOM IT MAY CONCERN:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, as amended the ROBINSON, ROBINSON, PETERSON, BERK, RUDOLPH, CROSS AND GARDE LAW OFFICE requests copies of any and all agency records and information, including but not limited to notes, letters memoranda, drafts, minutes, diaries, logs, calendars, tapes, transcripts, summaries, interview reports, procedures, instructions, allegation summary sheets, interim and/or final reports, status reports, and any and all other records relevant to and/or generated in connection with JOHN CORDER's concerns and allegations about the South Texas Project (STP) from June 1986 to the present. This request includes, but is not limited to all inspection reports, document reviews.

This request includes all agency records as defined in 10 C.F.R. 9.3a (b) and the NRC Manual, Appendix 0211, Parts 1.A.2 and A.3 (approved October 8, 1980) whether they currently exist in the NRC official "working" investigative or other files, or at any other location, including private residences.

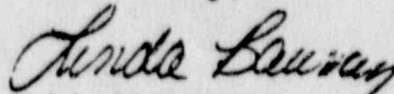
If any records, as defined in 10 C.F.R. 9.3a (b), and the NRC Manual, *supra*, and covered by this request have been destroyed, and/or removed, after this request, please provide all surrounding records, including but not limited to a list of all records which have been or are destroyed and/or removed, a description of the actions(s) taken relevant to, generated in connection implementing the action(s).

We are requesting this information as part of an ongoing monitoring project of the NRC's efforts to protect public health and safety at and near nuclear processing plants and radioactive waste facilities.

For any documents or portions that you deny due to a specific FOIA exemption, please provide an index itemizing and describing the documents or portions of documents withheld. The index should provide a detailed justification of your grounds for claiming each exemption, explaining why each exemption is relevant to the document or portion of the document withheld. This index is required under Vaughn v Rosen (I), 484 F2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974).

We anticipate a complete or partial response to this request within ten working days, as required by the FOIA.

Sincerely,



Linda Bauman

BPG/11b
NRC/foia

CC: Dennis Crutchfield