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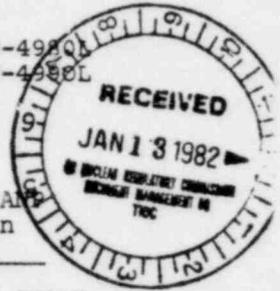
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF §
HOUSTON LIGHTING & POWER §
COMPANY, ET AL. §
§
(SOUTH TEXAS PROJECT §
UNITS 1 AND 2) §

DOCKET NOS. STN 50-4980A
STN 50-4980L



Applicants' Answers and Objections to CEU and CCANP
Joint Interrogatories and Request for Production
of Documents Dated December 21, 1981.

In response to a document entitled "CEU and CCANP Joint Interrogatories (sic) and Request for Production of Documents to Houston Lighting and Power pursuant to Board Order of December __, 1981," Houston Lighting and Power Company (HL&P), Project Manager of the South Texas Project, acting on behalf of itself and the other Applicants, the City of San Antonio, Texas, acting by and through the City Public Service Board of the City of San Antonio, Central Power and Light Company and the City of Austin, Texas, answers as set forth below. The names preceding each answer indicate the individual making the response.

Pursuant to 10 C.F.R. §2.741(a)(1), Applicants are not required to provide copies of requested documents, but rather, are only required to permit inspection and copying. Where the interrogatories request production of limited specific documents, however, Applicants have produced the documents herewith in order to facilitate the hearings on these issues. These documents are furnished under separate cover with tabs corresponding to the relevant interrogatory number. Where the interrogatory requires production of a large number of documents, the documents are not enclosed, but will be made available for inspection and copying in accordance with the regulations.

Applicants object in whole or in part to interrogatories 1, 2, 3, 26, 35, 36, 46, 47, 49, 50, 56 and 61 for the reasons set forth following each interrogatory.

Q.1 What is the HL&P position on CCANP Contention #23, (sic) State all facts and opinions and provide all documents on which the opinion is based.

A.1 (T. B. Hudson) CCANP Contention #23 (now 1.8(a)) states:

As evidenced by the investigative results in Allegation 1 of I&E Report 81-28, Houston Lighting and Power management failed to assure prompt corrective action by Brown and Root in the area of access engineering in violation of Criterion XVI of 10 C.F.R. Part 50, Appendix B.

Applicants' position is that there were two issues involved in the events described in Allegation 1 of I&E Report No. 81-28 and referenced in the documents identified therein; i.e. Audit BR-25, NCR ST-5 and NCR ST-5A. The

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first issue was the resolution of audit deficiency ADR BR-25-D-02 which required, inter alia, the updating of Brown & Root, Inc.'s (B&R's) Inservice Inspection (ISI) Manual. The ADR was issued in August 1979 and was closed in July 1981. If the response to this ADR is considered in a vacuum, HL&P would agree that the response time is excessive. The issuance and resolution of this ADR, however, was not the only issue that engaged the time of HL&P and B&R in this period.

In response to the ADR, B&R agreed in September 1979 to update the ISI Manual and reissue it as a TRD. In addition, B&R was to perform the following tasks in order to close out the ADR: (a) evaluate the impact on the ISI program of not revising the manual as required, (b) update certain drawings, and (c) verify that the ISI Manual implemented all applicable FSAR commitments. Progress was made on these tasks in the fall and winter of 1979-80. Through most of 1980, however, the Show Cause related activities placed an extremely heavy burden on engineering and management resources. As the Show Cause activities abated towards the end of 1980, HL&P's efforts to close ADR BR-25-D-02 were renewed. Two draft TRDs were prepared and evaluated. The draft chosen then went through extensive review and comment cycles in the spring of 1981 following each revision and was issued in July 1981. While the corrective action could have been completed more quickly, HL&P submits that reasonable men could differ as to whether HL&P's efforts to close the ADR constitute a failure to achieve "prompt corrective action" in violation of Criterion XVI of 10 CFR, Part 50, Appendix B.

The second issue was identified in NCR-ST-5 as an absence of B&R "implementing procedures for assuring access and performing design reviews for accessibility for Inservice Inspections." This issue was ultimately determined to be erroneous. Since there was no deficiency which required resolution, HL&P management did not fail to assure prompt corrective action with respect to this issue.

Applicants object to this interrogatory to the extent it requests identification of "all facts and opinions" on which HL&P's position is based. The discovery and identification of facts and opinions relevant to the development of a legal position is accomplished by HL&P's attorneys and, thus, is exempt from disclosure because it is attorney work product. In addition, the request to identify "all" facts and opinions is unduly burdensome and essentially requires the filing of testimony in the discovery phase. HL&P has stated its position and identified the basic facts and opinions on which the position is based. No more can be required by a proper interrogatory. The files related to the BR-25 audit, NCR-ST-5 and NCR-ST-5A contain the documents on which this position is based and such files will be made available for inspection at a mutually agreeable time.

Q.2 What is the HL&P position on CCANP Contention #24. (sic) State all facts and opinions and identify and provide copies of all documents considered in reaching that position.

A.2 (T. B. Hudson) CCANP Contention #24 (now 1.8(b)) states:

As evidenced by the investigative results in allegation 1 of I & E Report 81-28, Houston Lighting & Power management does not have a consistent policy on the issuance of stop

work orders in violation of Criterion I of C.F.R. Part 50, Appendix B.

Applicants' position is that the contention is erroneous. HL&P has a consistent policy on the issuance of stop work notices which is controlled by procedures. These procedures however, allow, and in fact require, that individuals use judgment in deciding whether particular fact situations justify the issuance of stop work notices. Since individuals are involved, there may be different approaches taken and different judgments reached in any given situation. All that Allegation 1 of I&E Report No. 81-28 evidences with respect to this issue is that different people had different views about the issuance of a stop work notice and that Mr. H. G. Overstreet, then HL&P's Project QA Supervisor, Procurement, changed his mind following discussion with others. These facts do not evidence a violation of Criterion I of 10 C.F.R. Part 50, Appendix B. Indeed, the NRC stated in the cover letter to HL&P transmitting I&E Report No. 81-28 that "Within the scope of this investigation, we found no instance where you failed to meet NRC requirements."

No documents, other than I&E Report No. 81-28 and 10 C.F.R. Part 50, Appendix B, were used in preparing the statement of position. Applicants object to this interrogatory to the extent it requests identification of "all facts and opinions" on which HL&P's position is based. The discovery and identification of facts and opinions relevant to the development of a legal position is accomplished by HL&P's attorneys and, thus, is exempt from disclosure because it is attorney work product. In addition, the request to identify "all" facts and opinions is unduly burdensome and essentially requires the filing of testimony in the discovery phase. HL&P has stated its position and identified the basic facts and opinions on which the position is based. No more can be required by a proper interrogatory.

Q.3 Please identify each and every person whom you consulted in reaching that position or preparing the response to interrogatories 1 and 2. Please state each persons (sic) position and responsibilities in either HL&P or B&R, in addition to the specific information provided by that individual.

A.3 (T. B. Hudson) The individuals consulted, other than attorneys, in reaching the position set forth in A.1 supra were:

<u>Name</u>	<u>Position and Responsibilities</u>
J. L. Blau	See A.21 <u>infra</u> .
R. A. Frazar	See A.14 <u>infra</u> .
H. G. Overstreet	See A.7 <u>infra</u> .
L. R. Jacobi	Supervising Engineer, Licensing with responsibility for STP licensing activities.
R. L. Ulrey	See A.14 <u>infra</u> .
J. E. Geiger	Project QA Manager for STP
M. F. Herring	See A.16 <u>infra</u> .
H. R. Hesidence	See A.7 <u>infra</u> .
R. P. Meineke	Supervisor for Technical Services - Supervises NDE/ISI/PSI section and Document Review section of the Houston QA office effective December 1981.
G. W. Oprea, Jr.	Executive Vice President responsible for all STP activities.

The individuals consulted, other than attorneys, in reaching the position set forth in A.2 supra were:

<u>Name</u>	<u>Position and Responsibilities</u>
J. L. Blau	See A.21 <u>infra</u> .
R. A. Frazar	See A.14 <u>infra</u> .
H. G. Overstreet	See A.21 <u>infra</u> .
D. G. Barker	See A.13 <u>infra</u> .
H. R. Hesidence	See A.7 <u>infra</u> .
R. L. Ulrey	See A.14 <u>infra</u> .
L. R. Jacobi	See above.
G. W. Oprea, Jr.	See above.

Applicants submit that the conversations between HL&P personnel and the attorneys involved in the NRC proceeding regarding Applicants' positions on contentions are privileged communications not subject to discovery. For this reason, Applicants object to interrogatory 3 to the extent it requires the divulging of attorney-client communications.

Q.4 Please provide a copy of HL&P Memo #Q-7050 dated June 5, 1981 concerning design review accessibility which was referred to in I&E Report #81-28 as attachment 1.

A.4 (L. R. Jacobi) HL&P does not receive a copy of I&E Reports with the attachments. Thus, HL&P can not produce "attachment 1." A copy of a HL&P Office Memorandum from S. A. Viaclovsky to H. G. Overstreet dated June 5, 1981 (ST-HL-19345) is enclosed and is thought to be "attachment 1" to I&E Report No. 81-28.

Q.5 Identify every person whom you consulted or contacted after receiving HL&P Memo #Q-7050 and state that persons (sic) position and responsibilities in addition to the specific information provided by each person.

A.5 (L. R. Jacobi) Mr. L. R. Jacobi contacted numerous individuals after receiving the Office Memorandum referenced in A.4, but not for the purpose of discussing the memorandum.

Q.6 Please provide copies of any and all documents from B&R regarding HL&P Memorandum #Q-7050.

A.6 (L. R. Jacobi) HL&P is not aware of any documents from B&R that relate to this memorandum in question. The memorandum was between HL&P employees and was not copied to any B&R employees. Moreover, the memorandum does not recite any directives given to B&R as a result of the meeting.

Q.7 Please provide a copy of NCR ST-5A which was identified in I&E Report #81-28 and identify each individual who provided information leading to the generation of NCR ST-5A and state each individuals (sic) position and responsibilities in addition to the specific information provided by each.

A.7 (H. G. Overstreet) A copy of NCR ST-5A and the transmittal memorandum from H. G. Overstreet to J. L. Blau (ST-HL-19421) are enclosed. In accordance with instructions received at the June 5, 1981, meeting documented in ST-HL-19345, Mr. H. G. Overstreet and Mr. H. R. Hesidence drafted NCR-ST-5A. The information on which the NCR was

based, however, came from the individuals listed as attendees on page 1 of the document produced in response to Q.4 (ST-HL-19345), but it is not possible to attribute specific information to particular individuals. Mr. Overstreet's position at the time the NCR was written was Project QA Supervisor with responsibility for supervising the HL&P QA groups providing overview and programmatic direction to B&R's QA activities for vendor surveillance, design engineering and auditing. Mr. Overstreet's current position is Supervisor, QA Training & Administration with responsibility for implementing QA training for HL&P personnel. Mr. Hesidence is an Engineer with responsibility for review of design to ensure that the designer has adequately considered the need for access to equipment and systems for pre-service and in-service inspections (PSI/ISI). The positions and responsibilities of the other attendees at the June 5, 1981, meeting are provided in response to other interrogatories.

Q.8 Please provide a copy of HL&P Office Memo #Q-9000 dated June 11, 1981 which was identified as attachment 2 in I&E Report #81-28.

A.8 (L. R. Jacobi) HL&P does not receive a copy of I&E Reports with the attachments. Thus, HL&P can not produce "attachment No. 2". However, the document produced in response to Q.7 is believed to be "attachment 2" to I&E Report No. 81-28.

Q.9 Please provide a copy of any and all documents from B&R and HL&P regarding HL&P Memo #Q-9000.

A.9 (L. R. Jacobi) The B&R and HL&P files for NCR ST-5A have been collected. They will be made available for inspection at a mutually agreeable time.

Q.10 Please identify each and every person whom you consulted in preparing a response to interrogatories 9 and state the persons (sic) position and responsibilities in addition to the specific information provided by each person.

A.10 (L. R. Jacobi) Mr. Jacobi initially contacted Mr. H. G. Overstreet to obtain a copy of the project file on the subject NCR. In subsequent conversations, Mr. Jacobi obtained additional file materials from Mr. H. R. Hesidence and personal notes from Mr. D. G. Barker.

Q.11 Please provide a copy of the draft Stop-Work letter, subsequently withdrawn, written in response to HL&P Office Memos #Q-7050 and #Q-9000.

A.11 (H. G. Overstreet) The draft stop work notice is enclosed. It should be noted that the notice was never "withdrawn", as stated in the question, because it was never issued.

Q.12 Please identify the HL&P personnel with management responsibility over the individual who drafted the stop-work letter referenced in the I&E Report #81-28.

A.12 (H. G. Overstreet) The primary author of the draft stop work notice was Mr. H. R. Hesidence. At the time the draft stop work notice was written, Mr. Hesidence reported for technical direction to Mr. J. L. Blau, who reported to Mr. Barker, who reported to Mr. J. H. Goldberg, who reported to Mr. G. W. Oprea.

Q.13 Please provide a copy of any and all documents or correspondences (sic) which led to the withdrawal of the draft stop-work letter and identify each and every person involved and set out the persons (sic) position and responsibilities in addition to the specific comments provided by each person.

A.13 (H. G. Overstreet, D. G. Barker) There was no "withdrawal" of the draft stop work notice as assumed in the question. No correspondence was prepared in connection with the decision to not issue the draft stop work notice. Immediately following the meeting on June 5, 1981, which is documented in ST-HC-19345 (A.4), and discussed in A.20, Mr. Hesidence prepared the draft stop work notice and Mr. H. G. Overstreet and Mr. Hesidence prepared the revised NCR (NCR ST-5A) with the thought of issuing them jointly. Mr. Overstreet discussed the matter with Mr. D. G. Barker, Manager, South Texas Project, Mr. Hesidence and Mr. J. L. Blau on June 8, 1981. Mr. Barker recognized Mr. Overstreet's authority to issue the stop work notice and suggested that the NCR be issued, but not the stop work notice, until he had contacted B&R to focus management's attention on the need to resolve NCR ST-5A. Mr. Overstreet decided to issue only the NCR and hold the draft stop work notice. Mr. Overstreet's position and responsibilities are set forth in A.7 above. As Manager, South Texas Project, Mr. Barker has responsibility for all STP activities, except Quality Assurance (QA). The positions and responsibilities of Mr. Hesidence and Mr. Blau are set forth in A.7 and A.21 respectively.

Q.14 Based on your understanding of the Allegations and Findings in I&E Report #81-28, identify individuals X,Y,I,K,C and L. Please set out each persons (sic) position and responsibilities.

A.14 (H. G. Overstreet) The individuals and current positions are set forth below:

X = R. A. Frazar-	Manager of QA for HL&P- provides administrative direction to STP QA organization and both administrative and programmatic direction to all other HL&P QA organizations and reports to Mr. G. W. Oprea, Jr.
Y = D. G. Barker-	(See A.13 above)
I = R. L. Ulrey-	Houston QA Manager - provides administrative and programmatic direction to the following Houston QA groups; Audits, Vendor Surveillance, Technical Services, QA Training & Administration and reports to R. A. Frazar.
K = S. A. Viaclovsky	(No longer with HL&P)
C = H. G. Overstreet	(See A.7 above)
L = H. R. Hesidence	(See A.7 above)

Q.15 Identify every person whom you consulted in preparing a response to Interrogatory 14 and state the persons (sic) position and responsibilities in addition to the specific information provided by each person.

A.15 (H. G. Overstreet) The identities of individuals referenced in I&E Report No. 81-28 were established jointly by R. A. Frazar, R. L. Ulrey, P. W. Ratter, H. G. Overstreet and R. M. McDaniel. Mr. McDaniel initially attempted to identify individuals C, D, E, F, G, H, I, J, K, M, N, O, S, W, X, Y and Z. The other individuals named above met to review and discuss Mr. McDaniel's list and then made changes to I, J, K, M, O and S and identified individual L. It is impossible to determine which individuals contributed what information in the meeting, other than to say that each individual concurred in his specific identification. Mr. Ratter is Supervisor, Vendor Surveillance in the Houston Office QA group. Mr. McDaniel is a Sr. QA Specialist in the STP Design Procurement QA group.

Q.16 Please provide a copy of NCR ST-5 dated November, 1980 which was identified in I&E Report #81-28 and identify each individual who provided information leading to the generation of NCR ST-5 and state each individuals (sic) position and responsibilities in addition to the specific information provided by each.

A.16 (H. G. Overstreet) NCR ST-5 and transmittal memorandum from H. G. Overstreet to A. J. Granger (ST-HL-17165) are enclosed. The individuals who generated NCR ST-5 are:

- S. A. Viaclovsky - no longer with HL&P, formerly was supervisor for Operations QA, NDE/ISI group.
- M. F. Herring - part of the Operations QA, NDE/ISI group and reported to S.A. Viaclovsky
- R. A. Romeo - Supervisor of Audits-Houston office QA - manages QA audit activities and reports to R. L. Ulrey.

No attributions of specific information are possible at this time. Mr. Viaclovsky was not contacted because he is no longer with HL&P.

Q.17 Please provide the names of B&R Management that were contacted regarding NCR ST-5A. Identify each person and provide the area of work responsibility for each individual.

A.17 (D. G. Barker) The contact referenced in Q.17 is assumed to be that made by Mr. D. G. Barker and referenced in I&E Report No. 81-28 which ultimately led to the closure of NCR ST-5A. Mr. Barker contacted Mr. E. A. Saltarelli, Vice President & Chief Engineer for Brown & Root, Inc. It is impossible for LL&P to identify every individual who might be considered "B&R Management" and who was contacted at any time by anyone regarding NCR ST-5A.

Q.18 Please provide copies of all documents such as notes, minutes, telephone notes, or memos that were utilized during the meeting and identify and provide copies of all documents that were generated during and as a result of that meeting on August 10, 1981.

- A.18 (L. R. Jacobi) Enclosed are:
- (a) the Meeting Notice dated 8-04-81 for the August 10, 1981 meeting;
 - (b) the sign-in sheet for the August 10, 1981, meeting;

- (c) draft meeting minutes dated 8-19-81 (4 pages typed and 1 handwritten);
- (d) final meeting minutes (ST-HL-22030);
- (e) 3 handwritten pages of notes taken by H. R. Hesidence;
- (f) 1 page of handwritten notes taken by J. L. Blau;
- (g) 1 page of handwritten notes taken by H. G. Overstreet.

Q.19 Please identify the individual from HL&P who made the contact with B&R on August 10, 1981 and provide copies of any and all documentation that would (sic) prove the fact of the statement made to the NRC.

A.19 (H. G. Overstreet) The contact in question was the August 10, 1981, meeting. The HL&P attendees were H. R. Hesidence, W. R. Reddell, H. G. Overstreet and J. L. Blau. Documents responsive to this request are those produced in response to Q.18 supra and the enclosed memorandum from H. G. Overstreet to J. L. Blau dated September 23, 1981 (ST-HL-21234) transmitting a closed out copy of NCR ST-5A.

Q.20 Please identify the persons in HL&P Management who supported the issuance of the Stop-Work order referenced in I&E Report #81-28. Identify specifically individuals J, K, S and M and set out the individual's position and responsibilities in addition to the specific comments provided by each person.

A.20 (H. G. Overstreet) During the June 5, 1981, meeting documented in ST-HL-19345 (A.4 supra), S. A. Viaclovsky and H. G. Overstreet were in favor of issuing a stop work notice. R. L. Ulrey thought a stop work notice might be in order after Mr. Overstreet and Mr. Hesidence had done some more work on the problem. After discussing the problem with Mr. Hesidence, Mr. Blau and Mr. Barker on the succeeding Monday, Mr. Overstreet decided to hold the draft stop work notice until B&R had an opportunity to respond to NCR ST-5A. Individuals J, K, S and M are:

J = R. A. Romeo (See A.16 above).
 K = S. A. Viaclovsky (See A.14 above).
 S = P. W. Ratter (See A.15 above).
 M = M. F. Herring (See A.16 above).

No specific comments regarding the issuance of the draft stop work notice are recalled by individuals J or S at this time. Individual K was not contacted since he is no longer with HL&P. Individual M did not attend the June 5, 1981, meeting.

Q.21 Please identify the persons in HL&P Management who did not support the issuance of a Stop-Work Order regarding the access design problems and set out the individuals (sic) position and responsibilities in addition to the specific comments provided by each.

A.21 (H. G. Overstreet) As discussed in A.13, supra, Mr. D. G. Barker requested that the stop work notice not be issued simultaneously with NCR ST-5A, but rather, that it be held so that he could contact B&R management to obtain action on the NCR. Mr. J. L. Blau supported Mr. Barker's request to Mr. Overstreet during the meeting in question. Mr. Ulrey supported a stop work notice, but suggested in the June 5, 1981, meeting that additional data be gathered prior to its issuance. He was not involved in

the meeting at which Mr. Barker and Mr. Overstreet discussed the draft stop work notice. While not considered "HL&P management", H. R. Hesidence was the HL&P engineer most familiar with access engineering and he did not believe a stop work notice was necessary. When questioned during the 81-28 investigation, Mr. Frazar had no objection to Mr. Barker's request or Mr. Overstreet's decision to hold the draft stop work notice, but Mr. Frazar was not involved in the decision making process. With the exception of Mr. Blau, the positions and responsibilities of these individuals are set forth in previous answers. Mr. J. L. Blau is Supervising Project Engineer with responsibility for supervising HL&P's overview of design and engineering activities.

Q.22 Please provide a copy of Audit Report BR-25, July 1979 and identify each and every person involved and set out the person's position and responsibilities in addition to the specific comments provided in any workpapers, memos, minutes or documents involved.

A.22 (L. R. Jacobi) The file for Audit Report BR-25 contains documents and information responsive to this request and will be made available for inspection at a mutually agreeable time.

Q.23 Identify each person within either B&R or HL&P that had access to or received Audit Report BR-25 and provide copies of all comments about or response to BR-25.

A.23 (L. R. Jacobi) The individuals who received copies of Audit Report BR-25 and who responded to it are identified in various file documents. Since the Audit Report has been in the files of both B&R and HL&P, it is impossible to identify all individuals who may have had access to the report.

Q.24 Please provide a copy of Audit Report HBR-43, performed in May-June, 1981 and identify each and every person involved and provide each persons (sic) area of responsibility in addition to copies of specific comments provided in any work papers, memos, minutes or documents involved in the Audit.

A.24 (L. R. Jacobi) The file for Audit Report HBR-43 contains documents and information responsive to this request and will be made available for inspection at a mutually agreeable time.

Q.25 Identify each person within either B&R or HL&P who received Audit Report HBR-43 and provide copies of all comments about or responses to HBR-43 including the action taken by each person.

A.25 (L. R. Jacobi) The individuals who received Audit Report HBR-43 and those who responded to it are identified in the audit file documents which will be made available for inspection at a mutually agreeable time.

Q.26 Please provide copies of all other documents, not previously supplied to Intervenors, dated January, 1979 or later which document the B&R access engineering problem.

A.26 (L. R. Jacobi) Allegation 1 of I&E Report No. 81-28 is the only allegation which involves access engineering and it does so only in the sense that access engineering was the subject matter of certain ADRs and NCRs. To the extent this interrogatory requests documents relating to

B&R's response to the ADRs and NCRs or HL&P's actions relating thereto, the audit files for audits BR-25 and HBR-43 and the files for NCRs ST-5 and 5A, which are being made available for inspection, contain all documents responsive to the request. If the term "access engineering problem" as used in Q.26 has some broader meaning than the matters discussed in Allegation 1 of I&E Report No. 81-28, Applicants object to the interrogatory as too vague and beyond the scope of the contentions.

Q.27 Please state what mechanisms other than a Stop-Work Order or a personal contact were available to HL&P QA personnel if an NCR failed to achieve effective and timely corrective action by B&R?

A.27 (R. A. Frazar) The only proceduralized method other than a Stop Work Notice would have been a Corrective Action Request. It should be noted, however, that all problem resolution between organizations or individuals on the Project is accomplished through "personal contact" of one form or another.

Q.28 Individual Y stated that subsequent to August, 1981, a joint (sic) meeting was held between HL&P QA and B&R personnel and that proper action was initiated by B&R. Please explain when the joint meeting was held subsequent to August, 1981. Provide copies of all documents utilized during that meeting and identify all HL&P and B&R personnel who attended. Please state their names and area of responsibility in addition to the specific comments, minutes, memos or documents generated during or after the meeting subsequent to August, 1981.

A.28 (D. G. Barker). The statement in I&E Report No. 81-28 regarding a meeting "subsequent to August 1981" is in error. Mr. Barker's (individual Y) statement to the NRC investigator was that a meeting was held subsequent to his contacting B&R management in June 1981. The meeting he had reference to was the August 10, 1981, meeting. Mr. Barker is unaware of any meeting subsequent to the August 10, 1981, meeting regarding this matter.

Q.29 Please provide copies of all documents and correspondence between Mr. Oprea and Mr. Frazer (sic), with or without serial numbers, regarding events discussed in I&E Report 81-28, including events set out in allegation and investigative finding #1.

A.29 (R. A. Frazar) There are no such documents or correspondence.

Q.30 Please explain what action was initiated by B&R to correct the noncompliances identified in NCR ST-5A. Please provide copies of all proposed corrective actions.

A.30 (H. G. Overstreet) B&R's proposed corrective actions are set forth in the enclosed response to NCR ST-5A (ST-BR-HL-40374 and ST-BR-HL-40368).

Q.31 Please identify and provide copies of all documents of HL&P or B&R regarding the resolution of NCR ST-5 that were generated between November, 1980 and June, 1981.

A.31 (L. R. Jacobi) The HL&P and B&R files on NCR ST-5 and 5A have been collected. They will be made available for inspection at a mutually agreeable time.

Q.32 Is it Mr. Barker's position that a Stop-Work Order based on NCR ST-5A could not have achieved corrective action within 60 days. (sic) Please explain.

A.32 (D. G. Barker) Mr. Barker's opinion is that a stop work order would have been sufficient to initiate corrective action. Whether or not the corrective action would have been completed in 60 days is speculative. However, Mr. Barker would have done everything possible to expedite the resolution of the problem. In the context of the concerns raised by HL&F QA, Mr. Barker offered to personally contact B&R to resolve the issue promptly.

Q.33 Please identify individual W and explain why he was not aware of NCR ST-5A until August 22, 1981. After reviewing NCR ST-5A what was the opinion of individual W of the seriousness of the problems set forth in subject NCR. (sic)

A.33 (J. E. Geiger) Individual W is J. E. Geiger, HL&F Project QA Manager, who started work at the site on June 22, 1981. Mr. Geiger had no reason to be aware of NCR ST-5A because he had no role in its issuance or its resolution. Since Mr. Geiger was not involved in the issuance or resolution of NCR ST-5A and had only recently joined HL&F when the NCR came to his attention, he had no factual basis on which to make a judgment regarding the severity of the problem documented by the NCR.

Q.34 Who or what persons (sic) primarily responsible for the fact that corrective action in the access engineering problem, which had been defined in July 1979, was not taken until required by the NRC Investigation in July-August 1981. (sic) What is the effect of this failure to take action on the severity, the magnitude, and the consequences of this problem. (sic)

A.34 (J. L. Blau) HL&F's Project Engineering Group has responsibility for ensuring that B&R Engineering responds to all ADRs or NCRs directed to it. Question 34 is in error in its assumption that corrective action on the "access engineering problem" resulted from the NRC investigation beginning July 29, 1981, (I&E Report 81-28).

As part of the closure of ADR BR-25-D-02, B&R evaluated the impact of not revising the ISI Manual as required. This evaluation indicated that no significant problems resulted from the deficiency. In addition, B&R has added another layer of review for access problems to the normal design process. Mr. J. B. Blakely has been evaluating the piping drawings prepared prior to the issuance of the PSI/ISI TRD against the criteria contained in the new TRD. To date, Mr. Blakely's review has not revealed any significant problems which resulted from not having the new TRD in place prior to July 1981.

Q.35 What is the HL&F position on CCANP Contention #25. (sic) State all facts and opinions and provide all documents on which the opinion is based.

A.35 (T.B. Hudson) CCANP Contention #25 (now 1.8(c)) states:

As evidenced by the investigative results in Allegation 2 of I&E Report 81-28, Houston Lighting & Power

management personnel are not committed to respecting the mandates of NRC regulations, especially Criteria I and II of 10 C.F.R. Part 50, Appendix B.

Applicants' position is that the contention is erroneous. As discussed in the I&E Report, some confusion did exist among some HL&P audit personnel following a meeting on June 11, 1981, regarding the use of documents such as the FSAR, the Quality Assurance Program Description (QAPD) and the B&R Project QA Manual (upper-tier QA documents) in performing field audits. Mr. R. A. Frazar realized the confusion existed and met with the Lead QA Specialist over auditing, Mr. P. W. Ratter, and Mr. T. J. Jordan later on the same day to settle the matter. Following this meeting, Mr. Frazar thought the matter was clear.

Subsequent communications from B&R indicated that some confusion still existed and Mr. Frazar responded by writing a letter setting forth very clearly the role of upper-tier QA documents in the audit process and the process for documenting discrepancies between or among procedures and the upper-tier QA documents. To be certain that no further confusion existed, the HL&P QA audit personnel were given training on Mr. Frazar's letter on September 3, 1981. These facts evidence short-lived confusion, at most, and prompt, responsible management actions to end that confusion once it became apparent.

Applicants object to this interrogatory to the extent it requests identification of "all facts and opinions" on which HL&P's position is based. The discovery and identification of facts and opinions relevant to the development of a legal position is accomplished by HL&P's attorneys and, thus, is exempt from disclosure because it is attorney work product. In addition, the request to identify "all" facts and opinions is unduly burdensome and essentially requires the filing of testimony in the discovery phase. HL&P has stated its position and identified the basic facts and opinions on which the position is based. No more can be required by a proper interrogatory.

The documents used in answering this interrogatory are the two letters produced in response to Q. 41 *infra.*, the HBR-43 audit file, notes taken by participants in the June 11, 1981, meeting, and the ADRs written against the FSAR and QAPD. All of these documents are either produced or made available for inspection pursuant to subsequent interrogatories.

Q.36 Please identify each and every person whom you consulted in reaching that position or preparing the response to interrogatory 1. (sic) Please state each persons (sic) position and responsibilities in either HL&P or B&R in addition to the specific information provided by each individual.

A.36 (T. B. Hudson) It is assumed that the reference to "interrogatory 1" in Q.36 is intended to be a reference to interrogatory 35. The individuals consulted, other than attorneys, in reaching the position stated in A.35 are:

<u>Name</u>	<u>Position and Responsibilities</u>
R. A. Frazar	See A.14 <u>supra</u> .
R. L. Ulrey	See A.14 <u>supra</u> .
P. W. Ratter	See A.15 <u>supra</u> .
G. W. Oprea, Jr.	See A. 3 <u>supra</u> .

For the reason stated in A.3 supra, Applicants object to interrogatory 36 to the extent it requires the divulging of attorney-client communications.

Q.37 Please identify all individuals who attended the meeting at STP during Audit HBR-43. Specifically state the name, address telephone, job description, employment location and area of responsibility.

A.37 (R. A. Frazar) This interrogatory is answered on the assumption that the referenced meeting is that of June 11, 1981. The individuals are:

G. B. Biggers
Lead Auditor
Gilbert Associates, Inc.
Houston, Texas
QA Consultant - No longer on assignment to HL&P

R. Deutschman
Project QA General Supervisor
Management Analysis Company
Jackson, Michigan
QA Management Consultant - No longer on assignment to HL&P

R. A. Frazar
QA Manager
Houston Lighting & Power Co.
P. O. Box 1700
Houston, Texas 77001
Development and implementation of the HL&P
QA Program
Baybrook Office: (713) 486-3737

T. Lioi
Lead Auditor
Gilbert Associates, Inc.
Reading, Pennsylvania
QA Consultant - No longer on assignment to HL&P

J. D. Peregoy
Lead Auditor
Houston Lighting & Power Co.
P. O. Box 1700
Houston, Texas 77001
Performance of quality audits
Baybrook office: (713) 486-3873

K. Ramsey
QA Specialist
Gilbert Associates, Inc.
Reading, Pennsylvania
QA Consultant - No longer on assignment to HL&P

P. W. Ratter
Supervisor, Vendor Surveillance
Houston Lighting & Power Co.
P. O. Box 1700
Houston, Texas 77001
Performance of vendor surveillance
Baybrook Office: (713) 486-3738

A. Smith
Project QA Manager
Brown & Root, Inc.
Bay City, Texas
Implementation of the STP Site QA Program
STP Site: (512) 972-3611

R. J. Vurpillat
QA Manager
Brown & Root, Inc.
P. O. Box 3
Houston, Texas 77001
Development and implementation of the B&R Nuclear QA Program
4100 Clinton Drive: (713) 678-5184

Q.38 Please provide copies of all documents that were utilized during the meeting of June 11, 1981 and identify and provide copies of all documents that were generated during and as a result of the meeting, including but not limited to notes made by persons attending.

A.38 (L. R. Jacobi) Enclosed are notes taken by J. D. Peregoy ("Attachment 1") and P. W. Ratter ("Attachment 2"). The two letters produced in response to Q.41 infra were generated as a result of the meeting. Messrs. Liol, Deutschman and Ramsey were not consulted because they are no longer with HL&P.

Q.39 What questions relative to HL&P QA management concerns led to this meeting being called. (sic) Please give details and documentation of these concerns.

A.39 (R. A. Frazar) There were no "questions relative to HL&P QA management concerns" which led to the June 11, 1981, meeting being called. The meeting was requested by B&R. The documents produced in response to Q.41 infra were generated as a result of the meeting.

Q.40 Was the proposed Stop-Work Order based on NCR ST-5A discussed at this meeting. (sic) Please give details and provide copies of all documents, including but not limited to NCR's and ADR's discussed at this meeting.

A.40 (R. A. Frazar) The proposed stop work notice based upon NCR ST-5A was not discussed at the June 11, 1981, meeting. The documents used or discussed at the meeting were the Quality Assurance Program Description (QAPD), the B&R QA Manual, Rev. 7 and draft ADRs. The QAPD was furnished to all parties as Applicants' Exhibit 8 in the ASLB hearings. The B&R QA Manual will be made available for inspection at a mutually agreeable time. The draft ADRs became ADR No. HBR-43-8 which is in the HBR-43 audit file that will be made available for inspection at a mutually agreeable time.

Q.41 Please provide a copy of B&R letter SFN Q-0100, dated June 30, 1981 and any memos, notes, correspondence or documents, with or without serial numbers, that individual X, Mr. Frazer (sic), generated to explain or comment on contents of B&R letter SFN Q-0100.

A.41 (R. A. Frazar) A letter from R. J. Vurpillat, B&R QA Manager, to R. A. Frazar dated June 30, 1981, (ST-BR-HL-40268) is enclosed. A letter from R. A. Frazar to R. J. Vurpillat dated August 24, 1981, (ST-HL-BR-6443), which responds to ST-BR-HL-40268, is enclosed. There are no other memos, notes, correspondence, or documents responsive to this request.

Q.42 Please provide a copy of HL&P office memo #Q-5000, dated July 24, 1981 and further identified as attachment 4 to I&E Report 81-28. In addition please provide any and all memos, notes, documents or correspondence that was generated in response to this HL&P office memo.

A.42 (L. R. Jacobi) HL&P cannot identify attachment 4 with certainty. The memo is thought to be ST-HL-19876 from R. L. Ulrey to G. W. Oprea, Jr. transmitting Audit Report HBR-43. The memo, the audit report and responses thereto are in the file which will be produced for inspection in response to Q.24 supra.

Q.43 Please provide copies of any document generated or written by either Mr. Oprea or Mr. Frazer (sic), with or without serial numbers, in response to the memo referenced above in interrogatory 42.

A.43 (R. A. Frazar) Enclosed is a 1 page handwritten note from Mr. G. W. Oprea to Mr. R. L. Ulrey. There are no other documents responsive to this request.

Q.44 Please provide a copy of HL&P letter SFN Q-3200 dated August 24, 1981 written by Mr. Frazer (sic). In addition, identify each and every person that received or had access to said letter.

A.44 (R. A. Frazar) The letter described (ST-HL-BR-6443) was produced in response to the second portion of Q. 41. Page 2 of the letter lists the persons copied. In addition, QA training on the letter was provided to the following QA audit personnel: R. L. Ulrey, R. A. Romero, R. J. Williamson, S.W. Bastier, W. H. Baldwin, R. D. Phillips, W. C. Dekle, W. G. Isereau G. B. Biggers, R. C. Nolin, J. D. Peregoy, R. L. Aiken, R. M. McDaniel, J. A. Powell, D. R. Valley, G. C. Rhoden, H. G. Overstreet, W. N. Phillips, Peter Bernstein and J. A. Thursby. It is impossible to identify all person who may have had access to the letter in the files of HL&P & B&R.

Q.45 What is Mr. Bakers (sic) best recollection of what Mr. Frazer (sic) said in the June 11, 1981 meeting regarding the writing of NCRs or ADRs based on the FSAR or the new QA Program Description. (sic)

A.45 (D. G. Barker) It is assumed that "Mr. Bakers" above should read "Mr. Barker's". Mr. Barker did not attend the June 11, 1981, meeting referenced in the question. Mr. Barker does not recall telling the NRC investigator that he attended the meeting, but if he did, the statement was in error.

Q.46 Please produce copies of all NCRs and ADRs written against the FSAR or the new QA program description by the HL&P QA department or departments involved in the June 11, 1981 meeting during the 6 months prior to the meeting.

A.46 (T. B. Hudson) Applicants object to the production of the requested documents because the contents of such NCRs and ADRs are not germane to contention 1.8. Applicants, however, will make the documents available for inspection at a mutually agreeable time and place.

Q.47 Please provide copies of all NCRs and ADRs written against the FSAR or the new QA program description by the HL&P QA department or departments involved in the June 11, 1981 meeting that were written after June 11, 1981 and before August 24, 1981.

A.47 (T. B. Hudson) Applicants object to this request for the reason stated in A.46, but will make the documents available for inspection at a mutually agreeable time and place.

Q.48 Please provide copies of all NCRs/ADRs written against the FSAR or new QA program description by B&R.

A.48 (L. R. Jacobi) Applicants assume the time frames utilized in Q.46 and 47 also apply to Q.48. There are no such NCRs/ADRs during this period.

Q.49 What is the HL&P position on CCANP Contention #26. (sic) State all facts and opinions and provide all documents on which each opinion is based.

A.49 (T.B. Hudson) CCANP Contention #26 (now 1.8(d)) states:

As evidenced by the investigative results in Allegation 4 of I&E Report 81-28, HL&P management failed to effectively implement a quality assurance program in violation of Criterion I of 10 C.F.R. Part 50, Appendix B.

Applicants' position is that the contention is erroneous. The principal investigative results of Allegation 4 of I&E Report No. 81-28 were that "both individuals C and F have adequate education and experience for their respective positions" and that the instructions given by Mr. Overstreet (C) regarding the writing of NCRs were appropriate under HL&P procedure PSQP-A9. In addition, two minor problems, which are described in A.52 *infra*, were found to have occurred in Mr. Overstreet's office due to Mr. Frazar's extensive commitments at the site. Neither problem prevented Mr. Overstreet from performing his job adequately. There is absolutely no evidence in allegation 4 of I&E Report No. 81-28 that the portion of HL&P's QA program for which Mr. Overstreet was responsible was not implemented properly.

Applicants object to this interrogatory to the extent it requests identification of "all facts and opinions" on which HL&P's position is based. The discovery and identification of facts and opinions relevant to the development of a legal position is accomplished by HL&P's attorneys and, thus, is exempt from disclosure because it is attorney work product. In addition, the request to identify "all" facts and opinions is unduly burdensome and essentially requires the filing of testimony in the discovery phase. HL&P has

stated its position and identified the basic facts and opinions on which the position is based. No more can be required by a proper interrogatory.

No documents, other than I&E Report No. 81-28, were used in answering this interrogatory.

Q.50 Please identify each and every person whom you consulted in reaching that position or preparing the response to interrogatory 49. Please state each persons (sic) position and responsibilities in either HL&P or B&R in addition to the specific information provided by each individual.

A.50 (T.B. Hudson) The persons consulted, other than attorneys, in reaching the position stated in A.49 are:

<u>Name</u>	<u>Position and Responsibilities</u>
R.A. Frazar	See A. 14 <u>supra</u> .
H. G. Overstreet	See A. 7 <u>supra</u> .
J. E. Geiger	See A. 33 <u>supra</u> .
G. W. Oprea, Jr.	See A. 3 <u>supra</u> .

For the reason set forth in A. 3 supra, Applicants object to interrogatory 50 to the extent it requires the divulging of attorney-client communications.

Q.51 Please provide documentation of the background experience and education that the NRC investigator/inspector determined was adequate for the HL&P QA Procurement Program positions held by individuals C and F.

A.51 (H. G. Overstreet) HL&P cannot state with certainty the facts relied upon by the "NRC investigator/inspector" in reaching his conclusions. The resumes of individuals C and F reviewed by the NRC investigator are enclosed. The last page of Mr. Overstreet's resume was not in the file reviewed by the NRC investigator, but was framed on the wall. The NRC investigator reviewed the commendation and commented upon it and, thus, it is enclosed herewith.

Q.52 Please identify and describe each of the minor problems that developed in individual C's office that was the result of a lack of positive leadership of individual X.

A.52 (R. A. Frazar) Mr. Overstreet, individual C, directed the efforts of HL&P's QA group for vendor surveillance, design engineering and auditing. This group, which is located at 4100 Clinton Drive, Houston, Texas, was part of the Project QA department which reported to Mr. Frazar (individual X). Mr. Frazar can recall only two problems arising within Mr. Overstreet's office due to a lack of guidance from Mr. Frazar. First, Mr. Overstreet was requested from time to time by Mr. Barker or his staff to help resolve issues identified by HL&P QA. It was not Mr. Overstreet's job to resolve these issues and this imposition on Mr. Overstreet's time ceased after Mr. Frazar discussed the matter with Mr. Barker. Second, Mr. Overstreet would at times attempt to perform B&R QA functions, rather than limiting himself to an overview role.

Q.53 Please state what period of time that individual X was the supervisor of individual C, when supervision of C was transferred to individual W and identify and

provide copies of all documents that were generated both before and after the transfer of authority.

A.53 (R. A. Frazar) Mr. Frazar (X) supervised Mr. Overstreet (C) from June 1980 through June 22, 1981. It is assumed that the document request is limited to documents related to the "transfer of authority". No documents were prepared regarding the "transfer" of Mr. Overstreet's supervision. Enclosed is an August 1, 1981, organizational chart which shows that Mr. Overstreet reported to Mr. J. E. Geiger who replaced Mr. Frazar as Project QA Manager.

Q.54 Please justify the transfer of authority from individual X to individual W when both individuals were apparently 90 miles away from individual C.

A.54 (R. A. Frazar, J. E. Geiger) There was no "transfer" of supervision in the sense of an organizational change. Mr. Overstreet reported to the Project QA Manager. This position was held by Mr. Frazar (X) until he was replaced by Mr. Geiger (individual W) effective June 22, 1981.

Q.55 Individual W remarked that he was clarifying individuals C's job function. Please explain what individual C thought his job function was under the supervision of individual X and how it would be different under individual W. Identify and provide copies of any and all documents that individual C depended of (sic) for direction in his job function both before and after the transfer of authority

A.55 (H. G. Overstreet) Mr. Overstreet (C) perceived his job function to be the same under Mr. Geiger (W) as it had been under Mr. Frazar (X), i.e., to provide overview and programmatic direction to B&R's QA program in the areas of vendor surveillance, design engineering and auditing. This job function is described by procedure and portions of the QAPD cited below. PSQP-A1 will be made available for inspection at a mutually agreeable time. The QAPD was produced as Applicants' Exhibit No. 8 in hearings before the Atomic Safety & Licensing Board. There was no change in these descriptions which occurred when Mr. Geiger replaced Mr. Frazar.

PSQP-A1
QAPD Section 1.3.8

Q.56 Identify and provide copies of any and all correspondence between individuals X, C and W that was generated between the months of January and December, 1981.

A.56 (T. B. Hudson) Applicants object to the question as overly broad and beyond the scope of contention 1.8. If the question is limited to correspondence regarding any change in Mr. Overstreet's (C) job function accompanying the replacement of Mr. Frazar (X) by Mr. Geiger (W), the answer is that there is no such correspondence.

Q.57 Please provide a copy of that section of the HL&P procedures that individual X relied on in determining that it would be proper for individuals C or F to instruct subordinates to tell B&R personnel to write up an NCR when HL&P personnel had discovered the nonconforming condition.

A.57 (L. R. Jacobi) A copy of sections 6.4.3.1 through 6.4.3.3 of HL&P procedure PSQP-A9 as in effect in June 1981 are enclosed.

Q.58 Individual W stated that he recognized that individual C did not receive adequate supervision in the past and there was a lack of proper guidance and direction on the part of HL&P management. Please explain in detail why individual W reached these conclusions and identify and provide copies of any and all documents that were utilized in this determination. If no documents were utilized by individual W, please have Individual W explain fully and completely in writing and provide a copy of that explanation to intervenors.

A.58 (J. E. Geiger) Mr. Geiger (W) relied primarily upon statements by Mr. Frazar (X) and Mr. Overstreet (C) in reaching the conclusions expressed in I&E Report No. 81-28. Secondly, he relied upon his personal experience and knowledge concerning an identical situation which occurred on his previous job. No documents were utilized by Mr. Geiger in reaching his conclusions.

Q.59 Please identify each and every person who attended the two training classes (sic) regarding HL&P procedures, stating their names, addresses, job location and position of responsibility.

A.59 (H. G. Overstreet) It is assumed that the two training classes referenced in Q.59 are those referenced at p. 9 of I&E Report No. 81-28 concerning PSQP-A9. Part 1 of the training on PSQP-A9 was given on April 27, 1981, and was attended by all of the individuals listed below. Part 2 of the training on PSQP-A9 was given on June 15 and 18, 1981, and was attended by all the individuals listed below except Mr. Diamond and Mr. Overstreet. Following a revision of PSQP-A9 and other procedures, training on all the revised procedures was given on September 3, 1981, and was attended by all individuals listed below, except for Mr. Morell who received make-up training later in September. The address for all of these individuals is Houston Lighting & Power Company, P. O. Box 1700, Houston, Texas 77001. At the time of the training sessions, all of these individuals were members of Mr. Overstreet's QA group with responsibility for the areas recited in A.7 supra and were located at 4100 Clinton Drive, Houston, Texas. The individuals referred to above are:

R. M. McDaniel	Sr. QA Specialist
J. B. Anderson	QA Specialist
W. B. Williams	MAC Consultant
D. D. Diamond	Lead QA Specialist
H. G. Overstreet	See A. 7 <u>supra</u>
C. D. Morell	Sr. QA Specialist

Q.60 Please provide copies of all training material, including but not limited to PSQP-A9 (sic) and explain in detail when the classes were held.

A.60 (H. G. Overstreet) The classes were held on April 27, 1981, June 15 & 18, 1981, and September 3, 1981, for the group and on September 18, 1981, for Mr. Morell. The training in April and June covered PSQP-A9 only, and the training in September covered all HL&P procedures listed below. Training material for the classes on PSQP-A9 held on

April 27, June 15 and 18, 1981, was PSQP-A9 and QS-001, "Implementation Review Training and Certification." For the remainder of the training classes, only the procedures were used. These documents will be made available for inspection at a mutually agreeable time.

PSQP - A1, A2, A4, A7, A8, A9, A12, A13, A15, A17 and A18.

QS-001

Q.61 Please provide a copy of the log that individual C keeps of NCR's that are written in his department. Please provide copies of all NCR's that individual C indicates were written in the six months identified in I&E 81-28.

A.61 (T. B. Hudson) Mr. Overstreet (C) does not keep the NCR log requested, but the log is enclosed. As evidenced by the log, Mr. Overstreet did not report any NCRs, but validated several that were reported by his staff. Applicants object to the production of these NCRs because the contents of such NCRs are not germane to contention 1.8, but will make the requested documents available for inspection at a mutually agreeable time.

Q.62 Please provide copies of any and all NCR's written by individual C after the date he was interviewed by the NRC investigator/inspector.

A.62 (H. G. Overstreet) Mr. Overstreet has not generated any NCRs since the August 1981 NRC investigation.

Q.63 Based on your understanding of allegation 4 and findings in I&E Report 81-28, who are individuals C, F, X, W, D, E, G, and H. (sic)

A.63 (H. G. Overstreet) The individuals are:

C = H. G. Overstreet	D = W. B. Williams
F = R. M. McDaniel	E = J. B. Anderson
X = R. A. Frazar	G = D. D. Diamond
W = J. E. Geiger	H = C. D. Morell

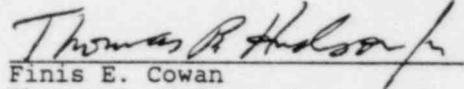
Q.64 Given the fact that both individual X and individual W are 90 miles from individual C, is there reason to believe that the background, experience and expertise of individual W are superior to individual X. (sic) Please explain in detail whether the answer is yes or no and provide copies of all documents relied on in formulating your answer to this interrogatory.

A.64 (R. A. Frazar, J. E. Geiger) There are no significant differences in the background, experience and expertise of Mr. Geiger (W) and Mr. Frazar (X) that indicate that either individual would be more effective than the other in providing guidance to Mr. Overstreet. No documents were relied upon in answering this interrogatory.

In those instances in which a request for production of documents was answered by a stating that the documents would be made available for inspection, the documents will be produced at the offices of HL&P or its attorneys in Houston, Texas. Applicants request that representatives of CEU or CCANP contact Mr. Thomas B. Hudson, Jr., attorney

for Applicants, at (713) 229-1283 to make arrangements for such inspection.

Respectfully submitted



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Attorneys for HOUSTON LIGHTING &
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of the South Texas Project,
acting herein on behalf of
itself and the other Applicants,
THE CITY OF SAN ANTONIO, TEXAS,
acting by and through the City
Public Service Board of the City of
San Antonio, CENTRAL POWER AND
LIGHT COMPANY and THE CITY OF
AUSTIN, TEXAS

TH:12:F

STATE OF TEXAS S
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COUNTY OF HARRIS S

BEFORE ME, the undersigned authority, on this day personally appeared Thomas B. Hudson, who upon his oath stated that he has answered the foregoing Interrogatories No. 1, 2, 3, 35, 36, 46, 47, 49, 50, 56, and 61, in Applicants' Answers and Objections to CEU and CCANP Joint Interrogatories and Request for Production of Documents Dated December 21, 1981, in his capacity as Attorney for Houston Lighting and Power Company, Project Manager of the South Texas Project, on behalf of itself and the other Applicants, and that all statements contained therein are true and correct to the best of his knowledge and belief.

Thomas B. Hudson

Thomas B. Hudson

SUBSCRIBED AND SWORN TO BEFORE ME by the said Thomas B. Hudson, on this 8th day of January, 1982.

Judy C. Williams

Notary Public in and for
Harris County, Texas

My commission expires:

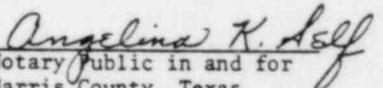
6-1-85

STATE OF TEXAS S
COUNTY OF HARRIS S

BEFORE ME, the undersigned authority, on this day personally appeared Richard A. Frazar, who upon his oath stated that he has answered the foregoing Interrogatories Nos. 27, 29, 37, 39, 40, 41, 43, 44, 52, 53, 54, and 64, in Applicants' Answers and Objections to CEU and CCANP Joint Interrogatories and Request for Production of Documents Dated December 21, 1981, in his capacity as, Manager, Quality Assurance, for Houston Lighting and Power Company, Project Manager of the South Texas Project, on behalf of itself and the other Applicants, and that all statements contained therein are true and correct to the best of his knowledge and belief.


Richard A. Frazar

SUBSCRIBED AND SWORN TO BEFORE ME by the said Richard A. Frazar, on this 8th day of January, 1982.


Notary Public in and for
Harris County, Texas

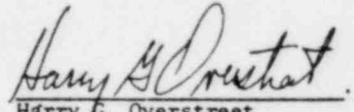
My commission expires:

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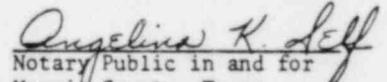


STATE OF TEXAS S
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BEFORE ME, the undersigned authority, on this day personally appeared Harry G. Overstreet, who upon his oath stated that he has answered the foregoing Interrogatories Nos. 7, 11, 12, 13, 14, 15, 16, 19, 20, 21, 30, 51, 55, 59, 60, 62, and 63, in Applicants' Answers and Objections to CEU and CCANP Joint Interrogatories and Request for Production of Documents Dated December 21, 1981, in his capacity as, Quality Assurance Supervisor, for Houston Lighting and Power Company, Project Manager of the South Texas Project, on behalf of itself and the other Applicants, and that all statements contained therein are true and correct to the best of his knowledge and belief.


Harry G. Overstreet

SUBSCRIBED AND SWORN TO BEFORE ME by the said Harry G. Overstreet, on this 8th day of January, 1982.


Notary Public in and for
Harris County, Texas

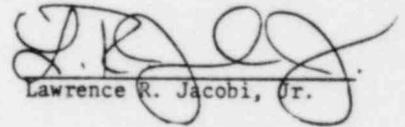
My commission expires:

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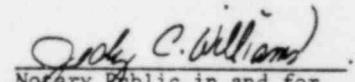


STATE OF TEXAS S
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COUNTY OF HARRIS S

BEFORE ME, the undersigned authority, on this day personally appeared Lawrence R. Jacobi, Jr., who upon his oath stated that he has answered the foregoing Interrogatories Nos. 4, 5, 6, 8, 9, 10, 22, 23, 24, 25, 18, 26, 31, 38, 42, 48, and 57 in Applicants' Answers and Objections to CEU and CCANP Joint Interrogatories and Request for Production of Documents Dated December 21, 1981, in his capacity as Supervising Engineer, Licensing, for Houston Lighting and Power Company, Project Manager of the South Texas Project, on behalf of itself and the other Applicants, and that all statements contained therein are true and correct to the best of his knowledge and belief.


Lawrence R. Jacobi, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME by the said Lawrence R. Jacobi, Jr., on this 7th day of January, 1982.


Notary Public in and for
Harris County, Texas

My commission expires:

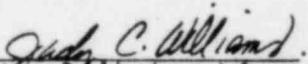
6-1-85

STATE OF TEXAS S
 S
COUNTY OF HARRIS S

BEFORE ME, the undersigned authority, on this day personally appeared David G. Barker, who upon his oath stated that he has answered the foregoing Interrogatories Nos. 13, 17, 28, 32 and 45 in Applicants' Answers and Objections to CEU and CCANP Joint Interrogatories and Request for Production of Documents Dated December 21, 1981, in his capacity as Manager, South Texas Project, for Houston Lighting and Power Company, Project Manager of the South Texas Project, on behalf of itself and the other Applicants, and that all statements contained therein are true and correct to the best of his knowledge and belief.


David G. Barker

SUBSCRIBED AND SWORN BEFORE ME by the said David G. Barker, on this 7th day of January, 1982.

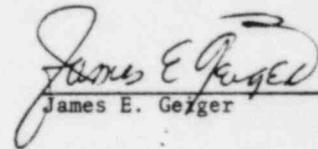

Notary Public in and for
Harris County, Texas

My commission expires:

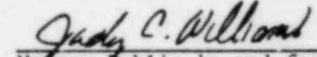
6-1-85

STATE OF TEXAS S
 S
COUNTY OF HARRIS S

BEFORE ME, the undersigned authority, on this day personally appeared James E. Geiger, who upon his oath stated that he has answered the foregoing Interrogatories Nos. 33, 54, 58 and 64, in Applicants' Answers and Objections to CEU and CCANP Joint Interrogatories and Request for Production of Documents Dated December 21, 1981, in his capacity as Project Quality Assurance Manager, for Houston Lighting and Power Company, Project Manager of the South Texas Project, on behalf of itself and the other Applicants, and that all statements contained therein are true and correct to the best of his knowledge and belief.


James E. Geiger

SUBSCRIBED AND SWORN TO BEFORE ME by the said James E. Geiger, on this 8th day of January, 1982.

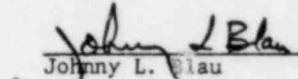

Notary Public in and for
Harris County, Texas

My commission expires:

6-1-85

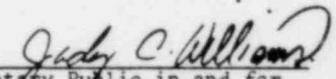
STATE OF TEXAS S
 S
COUNTY OF HARRIS S

BEFORE ME, the undersigned authority, on this day personally appeared Johnny L. Blau, who upon his oath stated that he has answered the foregoing Interrogatories No. 34 in Applicants' Answers and Objections to CEU and CCANP Joint Interrogatories and Request for Production of Documents Dated December 21, 1981, in his capacity as Supervising Project Engineer, for Houston Lighting and Power Company, Project Manager of the South Texas Project, on behalf of itself and the other Applicants, and that all statements contained therein are true and correct to the best of his knowledge and belief.



Johnny L. Blau

SUBSCRIBED AND SWORN TO BEFORE ME by the said Johnny L. Blau, on this 2nd day of January, 1982.



Notary Public in and for
Harris County, Texas

My commission expires:

6-1-85

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 OL
COMPANY, ET AL.) 50-499 OL
)
(South Texas Project,)
Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Answers and Objections to CEU and CCANP Joint Interrogatories and Request for Production of Documents dated December 21, 1981" and "Documents Produced Pursuant to CEU and CCANP Joint Interrogatories and Request for Production of Documents dated December 21, 1981" have been served on the following individuals and entities by express mail or hand delivery this 8th day of January 1982.

Charles Bechhoefer, Esq.
Chief Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James C. Lamb, III
Administrative Judge
313 Woodhaven Road
Chapel Hill, NC 27514

Ernest E. Hill
Administrative Judge
Lawrence Livermore Laboratory
University of California
P. O. Box 808, L-46 -
Livermore, CA 94550

Mrs. Peggy Buchorn
Executive Director
Citizens for Equitable
Utilities, Inc.
Route 1, Box 1684
Brazoria, TX 77422

Brian Berwick, Esq.
Assistant Attorney General
for the State of Texas
Environmental Protection
Division
P. O. Box 12548, Capitol Station
Austin, TX 78711

William S. Jordan, III, Esq.
Harmon & Weiss
1725 I Street, N.W.
Washington, D.C. 20006

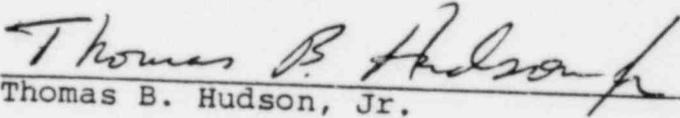
Kim Eastman, Co-coordinator
Barbara A. Miller
Pat Coy
Citizens Concerned About
Nuclear Power
5106 Casa Oro
San Antonio, TX 78233

Jay M. Gutierrez, Esq.
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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

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


Thomas B. Hudson, Jr.