

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

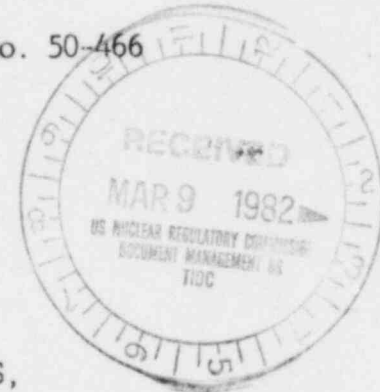
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of  
  
HOUSTON LIGHTING AND POWER  
COMPANY  
  
(Allens Creek Nuclear  
Generating Station, Unit  
No.1)

§  
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§

Docket No. 50-466



FIRST SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
REGARDING TEXPIRG CONVENTION 31  
FROM INTERVENORS DOGGETT, CONN, CUMINGS,  
LEMMER AND JOHNSTON

TO: NRC STAFF

Preface

Pursuant to Section 2.740b and 2.741 of the Commission's Rules of Practice, Intervenors DOGGETT, CONN, CUMINGS, GRIFFITH, LEMMER, and JOHNSTON propound the following Interrogatories and Request for Production of Documents to NRC Staff (hereinafter "Staff"). Each interrogatory should be answered separately and fully in writing under oath or affirmation by the person or persons making them no later than (14) days after service of these Interrogatories and Request for Production, and each document requested should be produced no later than thirty (30) days after service of these Interrogatories and Request for Production.

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## Interrogatories

1. (a) Identify each witness, other than an expert witness, who Staff may call in this proceeding to present additional testimony on Texpirg Contention 31, and provide a summary of the testimony in which each witness is expected to offer.

(b) Identify all documents upon which each such witness may rely in anyway, and provide copies of any such documents.

2. (a) Identify each expert witness who Staff expects to call in this proceeding to present additional testimony on Texpirg Contention 31.

(b) State the qualifications and credentials of each such expert witness.

(c) Provide a summary of the testimony which each such witness is expected to offer.

(d) State the factual basis for each conclusion or opinion each such witness expects to present or draw in such expert's testimony.

(e) Identify all documents prepared by, for, or under the supervision of each such expert witness, or reviewed or relied upon by such expert in formulating the expert's opinions and conclusions, including work papers, preliminary outlines and memoranda, and communications between such expert and Staff. Provide copies of any such documents.

3. When was the first member of the NRC informed that an consultant had been hired to conduct an independent third party review of design and engineering work at STNP? Who informed him? Who was informed?

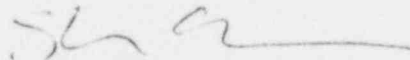
4. When did HL & P meet with Staff to discuss the Quadrex Report's findings?

5. How many reportable findings under ten (10) CFR 50.55 (e) were reported to the NRC in May, 1981? What were the findings? Who reported the findings? Please produce any documents or memoranda concerning the reporting of these findings.

6. When was a copy of the Quadrex Report actually given to any staff member of the NRC?

7. Please produce any written memoranda, or other documents which reflects the substance of the conversation between Don Sells and Mr. Goldberg concerning Quadrex which occurred the week of May 11, 1981.

Respectfully submitted,



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NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of §  
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HOUSTON LIGHTING & POWER §  
COMPANY § DOCKET NO. 50-466  
§  
(Allens Creek Nuclear §  
Generating Station, Unit §  
No. 1) §

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing First Set of Interrogatories and Requests for Production of Documents Regarding Texpirg Contention 31 from Intervenors Doggett, Conn, Cumings, Lenner, and Johnston to NRC Staff in the above-captioned proceedings were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 5th day of March, 1982.

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U.S. Nuclear Regulatory Commission  
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