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March 10, 1982

Charles Bechhoefer, Esquire 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, North Carolina 27514

Ernest E. Hill Administrative Judge Lawrence Livermore Laboratory Post Office Box 808, L-46 Livermore, California 94550

> Houston Lighting & Power Co. et al Re: South Texas Project, Units 1 & 2 Docket Nos. STN-50-498, STN-50-499

Gentlemen:

When the presentation of the remaining testimony in this proceeding was discussed on February 10, 1982 (Tr. 10379), it was suggested that the following sequence would be followed: (1) testimony on management of operations, first by the Applicants, then by the NRC Staff, and (2) testimony on the selected architect-engineer and construction manager and on the selected constructor, the organizational framework for continued construction, future QA/QC activities, etc. (see p. 4 of Fourth Prehearing Conference Order), first by the Applicants, then by the NRC Staff.

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Charles Bechoefer, Esquire Dr. James C. Lamb, III Ernest E. Hill March 10, 1982 Page Two

This particular sequence had been suggested at a time when it appeared that hearings would be held in March and that only the testimony on operations would have been pre-filed sufficiently in advance to be heard at that time.

However, as events have developed, the testimony on all subjects will be pre-filed at least 15 days prior to the next hearing (by April 5) \pm / and there is no need to utilize the foregoing sequence.

Applicants believe that Phase I of the proceeding can be completed more effectively and in a more logical fashion if they would proceed first and present all of their remaining testimony in the following sequence: (1) HL&P-Bechtel-Ebasco testimony on the selected architectengineer and construction manager and the selected constructor, the organizational framework for construction, etc., (2) HL&P-Bechtel-Ebasco testimony on the QA/QC program for the design and constructio.. phase, and (3) HL&P testimony on management of operations. Once the testimony of Applicants has been completed,*/, the NRC Staff can then provide all of its testimony on the foregoing subjects.

*/ During the week of March 8, Applicants are filing updated testimony on the management of operations and related FSAR amendments, Revision 3 of the STP Quality Assurance Program Description (including Ebasco's QA program) for design and construction, and a summary of Ebasco's qualifications. A description of the interface among HL&P, Bechtel, and Ebasco will be filed by March 22. Testimony by all parties concerning the selected contractors, the framework for construction, future QA/QC, etc. is to be filed by April 5.

*/ The intervenors have not indicated that they intend to present any testimony on these subjects. If they do file any testimony by the April 5 deadline, it would be presented prior to the NRC Staff's testimony. Charles Bechhoefer, Esquire Dr. James C. Lamb, III Ernest E. Hill March 10, 1982 Page Three

Counsel for the NRC Staff and CEU and Mr Sinkin on behalf of CCALP have informed us that they have no objection to the foregoing suggestion.

We respectfully request that the Board inform the parties at its earliest convenience whether our proposed sequence for the presentation of testimony is acceptable.

Very truly yours,

Of Counsel

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> Attorneys for HOUSTON LIGHTING & POWER COMPANY, Project Manager of the South Texas Project, acting herein on behalf of itself and the other Applicants, 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 CITY OF AUSTIN, TEXAS.

cc: Certificate of Service

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket Nos. 50-498 OL

HOUSTON LIGHTING AND POWER COMPANY, ET AL.

50-499 OL

(South Texas Project, Units 1 and 2)

Route 1, Box 1684

Brazoria, Texas 77422

CERTIFICATE OF SERVICE

I hereby certify that copies of Applicants' letter to the Atomic Safety and Licensing Board dated March 10, 1982, have been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid, on this 10th day of March, 1982.

Charles Bechhoefer, Esq. Brian Berwick, Esq. Chairman, Administrative Judge Assistant Attorney General for the State of Texas Atomic Safety and Licensing Board Panel Environmental Protection U.S. Nuclear Regulatory Commission Division Washington, D.C. 20555 P.O. Box 12548, Capitol Station Austin, Texas 78711 Dr. James C. Lamb, III William S. Jordan, III, Esq. Administrative Judge Harmon & Weiss 313 Woodhaven Road Chapel Hill, North Carolina 27514 1725 I Street, N.W. Washington, D.C. 20006 Ernest E. Hill Kim Eastman, Co-coordinator Administrative Judge Barbara A. Miller Lawrence Livermore Laboratory University of California Pat Coy P.O. Box 808, L-46 Citizens Concerned About Livermore, California 94550 Nuclear Power 5106 Casa Oro San Antonio, Texas 78233 Mrs. Peggy Buchorn Executive Director Citizens for Equitable Lanny Sinkin Utilities, Inc.

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