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April 5, 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
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Post Office Box 808, L-46
Livermore, California 94550

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

Gentlemen:

In accordance with the schedule discussed at the hearing on February 10, 1982 (Tr. 10379), enclosed is the following testimony to be presented on behalf of Applicants:

(1) Testimony of Messrs. Jerome H. Goldberg, Burton L. Lex and John Crnich regarding the management of the South Texas Project; and

(2) Testimony of Messrs. James E. Geiger, Donald T. Krisha and Clyde L. Hawn regarding the quality assurance program for the South Texas Project.

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Relatedly, Applicants plan to introduce the following exhibits:

- (1) Letter from Mr. Goldberg to Mr. Tedesco of the NRC, dated December 10, 1981, and its enclosure entitled "Summary of Bechtel's Nuclear Power Plant Experience." (Applicants' Exhibit 52)
- (2) Letter from Mr. Goldberg to Mr. Tedesco, dated March 15, 1982, and its enclosure entitled "Summary of Ebasco's Nuclear Power Plant Experience." (Applicants' Exhibit 53)
- (3) Letter from Mr. Goldberg to Mr. Tedesco, dated December 11, 1981, and its enclosures entitled "Transition Program Description for South Texas Project Engineering and Construction Management." (Applicants' Exhibit 54)
- (4) Letter from Mr. Goldberg to Mr. Tedesco, dated March 9, 1982, and its enclosure, Revision 3 of the Quality Assurance Program Description (QAPD) for the design and construction phase of the South Texas Project. (Applicants' Exhibit 55)
- (5) Bechtel's Topical Report BQ-TOP-1, Rev. 3A, the Bechtel Quality Assurance Program for Nuclear Power Plants, which is incorporated by reference in Revision 3 of the QAPD for STP. (Applicants' Exhibit 55A)

All of the foregoing exhibits were previously served on the Board and the parties. Bechtel's Topical Report BQ-TOP-1, Rev. 3A was served on the parties as part of Revision 2 of the QAPD, which was enclosed with a letter from Mr. Goldberg to Mr. Tedesco, dated December 11, 1981.

As set forth in Mr. Newman's letter to the Board of March 10, when the hearing resumes on April 20, we are planning to present the testimony in the following sequence:

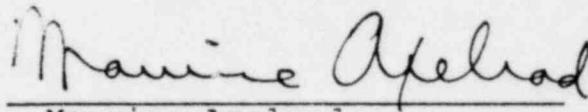
- (1) Testimony of Messrs. Goldberg, Lex and Crnich regarding management of the STP;

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(2) Testimony of Messrs. Geiger, Krisha and Hawn regarding the QA program for the STP; and

(3) Testimony of Messrs. Goldberg and Dewease regarding the operation of the STP.

Respectfully submitted,


Maurice Axelrad

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

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' letter to the Atomic Safety and Licensing Board dated April 5, 1982, and its enclosures entitled "Testimony of J. H. Goldberg, B. L. Lex and J. Crnich" and "Testimony of J. E. Geiger, D. T. Krishna and C. L. Hawn" have been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid on this 5th day of April, 1982.

Charles Bechhoefer, Esq.
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Board Panel
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