

383

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 OCT -9 11:52

In the Matter of ( )  
( )  
HOUSTON LIGHTING AND ( )  
POWER COMPANY, ET AL. ( )  
(South Texas Project, ( )  
Units 1 and 2) ( )

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket Nos. 50-498 OL  
50-499 OL

CITIZENS CONCERNED ABOUT NUCLEAR POWER (CCANP)  
SPECIFICATION OF PARTICULAR MATTERS FOR CONSIDERATION  
IN PHASE II HEARINGS

On May 22, 1984, the ASLB in this proceeding issued a Memorandum and Order calling upon the parties to identify the list of particular matters suggested for consideration in Phase II hearings in this proceeding.

The ASLB to date has reviewed numerous motions for new contentions and issued various orders relating to such motions. CCANP seeks further clarification from the ASLB on the ASLB's view of the issues which it will permit to be considered in Phase II hearings. Consequently, CCANP herein submits a comprehensive list of the issues it believes the Phase II hearings should encompass and awaits the ASLB's response to such a list.

Quadrex Issues

- I. Pre-Quadrex B&R Design and Engineering Process
  - A. Audits
    - 1. B&R
    - 2. HL&P
    - 3. Trends
    - 4. Failure to take timely corrective action
  - B. Reports to NRC
    - 1. 50.55(e)
    - 2. Other (e.g. Part 21)
  - C. Other studies of design and engineering (third party)
  - D. Guidance to HL&P and B&R QA personnel

8410110151 841001  
PDR ADOCK 05000498  
G PDR

DS03

## II. Commissioning of Quadrex

- A. Quadrex/HL&P relationship established
- B. Direction
  - 1. HL&P defining study
    - a. Known problems of industry
    - b. Known problems of B&R
- C. Purpose
  - 1. HL&P view
  - 2. Quadrex view
- D. Quadrex qualifications
  - 1. Previous studies
  - 2. Staff experience

## III. Conduct of Study

- A. Methodology
  - 1. Location
    - a. On site
    - b. Home Office
  - 2. Sampling technique
    - a. Who devised
    - b. How implemented
  - 3. Extensiveness
    - a. Time
    - b. Personnel
    - c. Cost
    - d. Drawings, descriptions, etc. reviewed
- B. Interaction HL&P/Quadrex
  - 1. Interim Meetins
  - 2. Comments on Drafts
  - 3. Revisions during study
    - a. topics
    - b. approach/methodology
    - c. scope
- C. Interaction HL&P/B&R
  - 1. Interim meetings
  - 2. Comments on drafts
  - 3. Revisions of study discussed
- D. Interaction B&R/Quadrex
  - 1. Interim meetings
  - 2. Comments on drafts
  - 3. Revisions of study discussed
- E. Quadrex
  - 1. Changes over time period of study
    - a. Methodology
    - b. Topics
    - c. Opinion or perspective
    - d. Scope
    - e. Categorization
- F. Personnel (not covered by II.D.2 or III.A.3.b.)
- G. Interactions HL&P/NRC
  - 1. Goldberg/Sells
  - 2. HL&P/Region IV

IV. Delivery of Study

A. Meetings

1. Responses of HL&P
2. Responses of B&R
3. Quadrex responses to HL&P and B&R responses

V. Notification/Reportability

A. Obligations to Board and Staff

1. B&R
2. HL&P
3. Quadrex
4. Policy guidance issued by
  - a. HL&P
  - b. B&R
  - c. NRC

B. 50.55(e)

1. Quadrex Reports by HL&P
  - a. Details, reporting process, substance
  - b. Safety Significance
  - c. Methodology for deciding notification
  - d. Methodology for deciding reportability

VI. Substance of Quadrex

- A. Specific Findings
- B. Generic Findings
- C. Implications for HL&P's Character and Competence

VII. Post Quadrex/Pre NRC Review (August 1981)

- A. Changes in B&R design and engineering
- B. Changes in HL&P design and engineering
- C. Changes in B&R requested by HL&P
  1. Implemented by B&R
  2. Not implemented by B&R
- D. Construction permissions sought and received from NRC
- E. Other responses

VIII. NRC Review of Quadrex

- A. Investigation in August 1981
- B. Region IV
- C. Sells/NRR
  1. Freinvestigation (August 1981)
  2. Postinvestigation
- D. Reis/Gutierrez
- E. Construction permissions sought and received from NRC

IX. NRC Investigations

- A. CCANP Chronology
- B. Dircks Chronology
- C. 82-02
- D. NUREG-0948

X. NRC Testimony

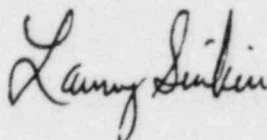
- A. Dircks to Congress
- B. Any other testimony

- XI. Quadrex Allens Creek
  - A. Failure to Testify
  - B. Board Order reopening
  - C. Testimony
    - 1. NRC
    - 2. HL&P
  
- XII. Termination of B&R as A-E
  - A. HL&P considerations re changing architect-engineer
    - 1. April meeting Corpus Christi
    - 2. Decision making process
    - 3. Reasons for removal
  
- XIII. Phase I Hearings STNP
  - A. Testimony
    - 1. Quadrex coverage
    - 2. Engineering generally
  - B. Consultant List
  - C. Pleadings on Quadrex to date
    - 1. NRC
    - 2. HL&P

Other Issues

- I. Hurricane Contention
- II. Bechtel/Ebasco Performance
- III. Unstable Soil Conditions (pending)
- IV. Reliability of NRC Investigations

Respectfully submitted,



Lanny Sinkin

Representative for Intervenor  
Citizens Concerned About Nuclear  
Power, Inc.  
114 W. 7th, Suite 220  
Austin, Texas 78701  
(512) 478-7197  
(512) 478-3290

October 1, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

'84 OCT -9 A11:52

In the Matter of ( )  
( )  
HOUSTON LIGHTING AND ( )  
POWER COMPANY, ET AL. ( )  
(South Texas Project, ( )  
Units 1 and 2) ( )

Docket Nos 50-498 DL  
50-3474 DL

CERTIFICATE OF SERVICE

I hereby certify that copies of CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. (CCANP) SPECIFICATION OF PARTICULAR MATTERS FOR CONSIDERATION IN PHASE II HEARINGS were served by Express Mail (\*) or by deposit in the U.S. Mail, first class postage paid to the following individuals and entities on the 1st day of October 1984.

Charles Bechhoefer, Esquire  
Chairman  
Atomic Safety and Licensing Board  
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  
Hill Associates  
210 Montego Drive  
Danville, California 94526

Mrs. Peggy Buchorn  
Executive Director, C.E.U.  
Route 1, Box 1684  
Brazoria, Texas 77422

William S. Jordan, III, Esq.  
Harmon, Weiss & Jordan  
2001 S Street, N.W., Suite 430  
Washington, D.C. 20009

Pat Coy  
5106 Casa Oro  
San Antonio, Texas 78233

Brian Berwick, Esquire  
Asst. Atty. Gen.  
State of Texas  
Environmtl. Protection  
P. O. Box 12548, Capitol Sta.  
Austin, Texas 78711

Robert G. Perlis, Esquire  
Office of the Exec. Leg. Dir.  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

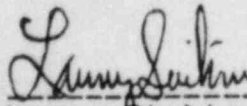
Jack R. Newman, Esquire  
1615 L Street, NW  
Washington, D.C. 20036

Melbert Schwarz, Esquire  
Baker and Botts  
300 One Shell Plaza  
Houston, Texas 77002

Atomic Safety and Licensing Bd.  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

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

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

  
-----  
Lanny Sinkin