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UNITED STATES OF AMERICA OFFICE OF SECRETARY  
NUCLEAR REGULATORY COMMISSION DOCKETING & SERVICE  
BRANCH

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) )

JOINT AFFIDAVIT OF MARK R. WISENBURG AND  
JAMES E. GEIGER

1. My name is Mark R. Wisenburg. I am Manager, Nuclear Licensing for Houston Lighting & Power Company (HL&P). In that capacity, I am responsible for the development and coordination of nuclear licensing activities associated with the South Texas Project (STP) including preparation of licensing submittals, communication with the NRC Staff, technical direction to Project licensing engineers, and coordination of nuclear licensing related information among other Project organizations. A summary of my background and qualifications is attached to this Affidavit. (MRW)

2. My name is James E. Geiger, P.E. I am Manager, Quality Assurance for HL&P. In that capacity, I am responsible for identification of quality-related problems at STP, initiation of action to resolve such problems, and verification of the

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implementation and effectiveness of such actions. A summary of my background and qualifications is attached to this Affidavit.

(JEG)

3. The purpose of this Affidavit is to supplement the affidavit filed by the NRC Staff on December 21, 1984 (as corrected by the Staff's January 24, 1985 letter to the Board) on construction QA/QC activities at STP under the new contractors (collectively referred to herein as the "Staff Affidavit").

(MRW, JEG)

4. I would like to begin by elaborating on the Staff's discussion of the current status of construction activities at STP (Staff Affidavit at ¶¶ 12-14). When construction functions were transferred to Bechtel Energy Corporation (Bechtel) and Ebasco Constructors, Inc. (Ebasco) in early 1982, approximately 35% of the construction of the STP (including Unit 1, Unit 2, and balance-of-plant) had been completed. Since that time construction has progressed so that, at the end of January, 1985, approximately 65% of STP was complete. More than 15% of STP was completed in 1984 alone. At the end of January, 1985, Unit 1 was approximately 75% complete. Principal categories of construction performed since early 1982 are reflected by the following quantities of materials or items that have been installed (with work performed prior to 1982 indicated in parentheses): about 90,000 cubic yards of concrete (about 325,000 cubic yards); about 2,830,000 pounds of HVAC ductwork (about 180,000 pounds); about 130,000 linear feet of cable trays

(about 15,000 linear feet); about 180,000 linear feet of metallic conduit (about 120,000 linear feet); about 2,300,000 linear feet of wire and cable (about 125,000 linear feet); about 120,000 linear feet of small pipe (about 10,000 linear feet); about 175,000 linear feet of large pipe (about 160,000 linear feet); and about 10,000 large hangers (about 500 hangers). The substantial construction effort taking place at STP is also reflected by the on-site workforce in January, 1985, which, without including HL&P personnel, reached a total of 8,277, consisting of 715 Bechtel jobsite personnel in construction management (including site engineering), 7,237 Ebasco personnel (5,948 manual and 1,289 nonmanual) and 325 personnel of other contractors. (MRW)

5. In paragraphs 19 and 38 of its Affidavit, the Staff refers to additional management personnel hired by HL&P at the corporate level and on-site, and to the shifting of personnel within HL&P's organization. Since the close of the record in the Phase I hearings, HL&P has continued to strengthen and improve its nuclear organization by the addition and transfer of experienced, seasoned professionals within management positions at the corporate level and onsite. (MRW)

6. In July 1984, Mr. James T. Westermeier joined HL&P as Project Manager, South Texas Project. Mr. Westermeier brings to that position over 31 years of technical and managerial experience, of which 25 years is nuclear related. He was formerly employed by Commonwealth Edison Company as Project

Manager for the Byron/Braidwood Nuclear Projects and was previously associated with the Carrol County and Zion nuclear plants. (MRW)

7. In June 1984, Mr. E. W. Dotson, P.E. joined HL&P as Project Engineering Manager for STP. Mr. Dotson brings to his position 20 years of professional engineering experience, of which 18 years is nuclear related. He was formerly employed by Florida Power and Light as Project Manager for the St. Lucie 2 Nuclear Project. Before that, he held nuclear engineering positions with Westinghouse, Burns & Roe and Babcock and Wilcox. The hiring of Mr. Dotson allowed HL&P to move the former Manager of Engineering, Mr. Stephen M. Dew, P.E., to the Project site as Deputy Project Manager for site activities. This move strengthens the HL&P management presence at the STP site and provides for improved and more rapid HL&P response to developments in construction, startup and site engineering. Mr. Dew has over 12 years of nuclear engineering experience including positions with Babcock and Wilcox, Stone and Webster, and Brown & Root. (MRW)

8. In March 1984, Mr. T. J. Jordan, formerly Project QA Supervisor, Design/Procurement assumed the onsite position of Project QA Manager, STP, reporting to me. Mr. Jordan's experience includes over 9 years of experience at STP in various QA positions including Supervisor, Quality Systems and Lead Engineer - STP Mechanical QA Group. (JEG)

9. In August 1984, Mr. W. N. Phillips, formerly Projects QA Manager, Fossil was promoted to the newly established position of Program Manager, SAFETEAM. Mr. Phillips had previously served for a year as STP QA Manager and has over ten years of nuclear/fossil QA experience. SAFETEAM is the program discussed in paragraph 20 of the Staff Affidavit and in paragraph 18 below, which was established to investigate workers' concerns related to plant quality and safety. (MRW)

10. Mr. R. J. Daly joined HL&P as Startup Manager in August 1984. Mr. Daly brings to his position over 34 years of professional experience, of which 27 years are nuclear related. He was formerly employed by Public Service of New Hampshire as Test Group Manager for startup and test activities for Seabrook Station Unit No. 1. Previously he was employed by various utilities, Westinghouse, and Stone and Webster in connection with startup of the following nuclear plants: Callaway Unit 1, Angra Nuclear Station in Brazil, North Anna Units 1 and 2, Beaver Valley Unit 1, and Fitzpatrick Nuclear Station. (MRW)

11. Mr. Dennis J. Cody joined HL&P in 1982 and was appointed Manager of the newly organized Nuclear Training Department in 1983. Mr. Cody has over 16 years of professional experience, all of it nuclear related. He had prior experience in nuclear training with NUS Training Corporation and Cincinnati Gas and Electric Company. (MRW)

12. Finally, my appointment to Manager, Nuclear Licensing in September 1982, permitted the promotion of Cloin G. Robertson, P.E., to the position of General Manager, Nuclear Engineering, with responsibility for Nuclear Services, Nuclear Fuel and, at that time, Nuclear Licensing. In November 1984, I began reporting directly to the Vice-President, Nuclear Engineering and Construction. Mr. Robertson has over 26 years of engineering experience, of which over 12 is nuclear related. He has been previously employed by General Electric, the New York Atomic Energy Council, the New York State Energy Research and Development Authority, and Stone and Webster. My background and qualifications are provided in the attachment to this Affidavit. (MRW)

13. The Staff Affidavit discusses the only SALP evaluation of STP ("I&E Report 83-26" or "the SALP Report") that has been conducted since mid-1982, which covered Project activities from December 1, 1982, through November 30, 1983. No SALP evaluation was conducted for the period between June 30, 1981, and December 1, 1982, due to the limited engineering and construction activities during the transition to Bechtel and Ebasco. I&E Report 83-26 at 2. (MRW)

14. The SALP Board assessed HL&P's performance in eleven selected functional areas. In eight of those areas, HL&P's performance was rated in Category 1 or 2, as defined in the SALP Report (page 3) and the Staff Affidavit (¶23). The bases for these assessments are contained in the SALP Report,

and, in HL&P's view, its performance in these areas has since continued to improve. For example, with respect to licensing activities, HL&P has established a licensing office in Bethesda, Maryland to facilitate communication with the NRC during the completion of the review of the application for operating licenses. Administration of the Quality Assurance Program (QAP) has been improved through the revisions to the QAP referred to in paragraph 26 of the Staff Affidavit. Management controls have been strengthened through the staffing of the Project Manager and Project Engineering Manager positions with experienced, seasoned professionals (Mr. J. T. Westermeier and Mr. E. W. Dotson, respectively) and through the creation of the new on-site position of Deputy Project Manager, to which Mr. Dew was assigned. The qualifications of these individuals are described in paragraphs 6 and 7 above. (MRW, JEG)

15. In three areas, the SALP Report rated HL&P's performance as Category 3. Corrective actions in those areas were underway before issuance of the SALP Report and are summarized in a letter from HL&P to Region IV dated June 8, 1984 which was served on the Board and the parties. Although the corrective actions were not reflected in the SALP Report itself (because the matters in question were identified after the SALP review period), they were discussed with the SALP Board at the meeting on May 10, 1984. The Regional Administrator's June 22, 1984 letter noted that if HL&P "carr[ie]d out the actions as proposed, we could expect to see improvement in these [three]

areas." The Staff Affidavit, of course, acknowledges that "[m]uch improvement has been noted in the last 18 months with regard to the underlying causes of reportable deficiencies and the tracking of corrective actions to completion" (Staff Affidavit at ¶ 24), and the SALP Report did state that HL&P's 10 C.F.R. § 50.55(e) reports are "timely," and that "the NRC's review of the potentially reportable items [has] confirmed the licensee's decisions on reportability" (I&E Report 83-26 at 8-9). (MRW)

16. The Staff Affidavit also identifies ten violations and one deviation that have been documented in NRC inspection reports since mid-1982. The Staff has noted that HL&P has acted promptly in each case and implemented appropriate corrective actions and recurrence controls. (Staff Affidavit at ¶ 19). Two additional violations (82-01-01, a Severity Level V violation and 82-02-01, a Severity Level IV violation) dealt with activities prior to mid-1982, but were documented in inspection reports issued after the closing date for reports included in the Phase I proceeding. Both violations have been closed by Region IV (I&E Report 82-15 at 4; I&E Report 84-12 at 5-6). Copies of HL&P's responses to notices of violation have been served on the Board and the parties. (MRW)

17. Paragraph 21 of the Staff Affidavit states that thirteen allegations involving activities at STP have been received by Region IV since mid-1982. Regardless of the source from which allegations are received, HL&P is vitally concerned



that any matter affecting safety and/or quality identified by persons knowledgeable of STP, especially present or former Project employees, be thoroughly investigated by HL&P and/or Bechtel, Ebasco or SAFETEAM, and HL&P remains involved until each investigation is complete. HL&P supplements the information provided by the Staff in paragraph 21 as follows:

(1) The present status of the three allegations referred to HL&P that were still under investigation at the time that the Staff submitted its Affidavit, including one each in the categories identified as "intimidation of QC inspectors," "QA/QC deficiencies," and "improper construction practice" (Staff Affidavit at ¶ 21) is as follows:

(a) The investigation of the allegation involving "intimidation of QC inspectors" has been closed. While the allegation was not substantiated, it resulted in the identification of a construction employee whose rough and direct criticisms of the work of QC inspectors may have been interpreted as intimidating. That individual was cautioned appropriately. Although not as a result of this incident, HL&P's Executive Vice President-Nuclear has reaffirmed to all Project employees the company policy prohibiting harassment and intimidation and has cautioned all employees to conduct themselves in a professional manner.

(b) The "QA/QC deficiency" involved allegations by a former Bechtel employee who, after being laid off, expressed unspecified "safety concerns." Efforts to have the individual identify his concerns more specifically, including a written request for information, were unsuccessful. The investigation of this item has been completed.

(c) The matter categorized as "improper construction practice" involved concerns expressed by a Project employee regarding various aspects of the permanent plant maintenance program. The investigation is underway and should be completed in the near future.

(2) With respect to the allegations which the Staff stated were closed prior to the submittal of its Affidavit:

(a) The matter categorized as "lack of qualification of QA/QC personnel" involved an allegation that some unqualified Brown & Root QA/QC personnel had been hired by Bechtel. The allegation was investigated by HL&P and Region IV, both of whom concluded that it was without merit. The Region IV investigation is documented in I&E Report 84-08 at 11-12.

(b) The matter categorized as "efforts in document control" is discussed in paragraph 33 of the Staff Affidavit and resulted in a Severity Level IV violation (84-07-01). In response, HL&P took prompt and effective corrective actions. Region IV subse-

quently reviewed those actions, noted "significant improvements in document control," and closed the violation. I&E Report 84-14 at 4.

(c) One of the matters categorized as "improper construction practice" is discussed in paragraph 32 of the Staff Affidavit and was closed in I&E Report 84-08 at 10-11.

(d) The matter categorized as "falsification of records" involved a construction foreman who violated Project procedures for the control of weld filler material. No safety-related welding was involved. The individual's welding certification was withdrawn and additional disciplinary action was taken. (JEG)

18. As indicated above, HL&P, Bechtel, Ebasco, and SAFETEAM receive allegations directly, as well as through referrals from the NRC Staff. The SAFETEAM organization was established in September, 1984 to actively solicit and investigate quality or safety-related allegations from present, former, and exiting employees, and provides an opportunity for such individuals to identify their concerns outside HL&P, Bechtel and Ebasco investigation programs. (JEG)

19. Whenever an allegation investigation is conducted by HL&P, Bechtel, Ebasco or SAFETEAM, the anonymity of the allegor is protected at the allegor's request. HL&P management stays informed regarding the status and results of the investigation from initiation through closure. When HL&P or SAFETEAM

conducts the investigation, HL&P management receives information concerning the allegation, as well as a report of the investigation and, as necessary, monitors the conduct of the investigation. Bechtel and Ebasco investigations are monitored by HL&P's Project QA Manager from initial receipt of the allegation through closure. The Project QA Manager approves both the methodology to be used for the investigation and Bechtel's or Ebasco's resolution. (JEG)

20. Region IV has randomly monitored various HL&P and Ebasco investigations and has concluded that "[e]ach . . . appears to have been conducted in a well organized and thorough manner by personnel cognizant in the subject area of each allegation." I&E Report 84-08 at 12. Efforts are made in each instance to keep the NRC Resident Inspector apprised of the allegation and the status of the investigation, and to notify the alleged regarding the results and conclusions of the investigation. (JEG)

21. The Staff Affidavit (paragraphs 26 and 27) refers to Revision 3 of the Quality Assurance Program Description (QAPD, Rev. 3; Applicants' Exh. 55), and notes that the QAPD has been periodically revised and that Revision 9 is the current issue. The revisions to the QAPD were submitted in accordance with 10 C.F.R. § 50.55(f)(3)(1984) \*/ and copies were served on the

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\*/ The revisions were submitted as follows: Rev. 4, ST-HL-AE-949, May 18, 1983; Rev. 5, ST-HL-AE-1019, Nov. 1, 1983; Rev. 6, ST-HL-AE-1077, Apr. 2, 1984; Rev. 7, ST-HL-AE-1120, July 27, 1984; Rev. 8, ST-HL-AE-1149, Nov. 2, 1984; Rev. 9, ST-HL-AE-1173, Jan. 15, 1985.

Board and the parties. They involved no relaxation of QA commitments. Region IV has reviewed the revisions through Revision 7 and its letter of August 14, 1934 to HL&P stated that the QAPD, as revised by Revision 7, is acceptable. Revisions 8 and 9 are now under review by Region IV. (JEG)

State of Texas

County of Harris

I, Mark R. Wisenburg, of lawful age, being first duly sworn, upon my oath certify that I have reviewed and am thoroughly familiar with the statements contained in the paragraphs designated by my initials in the attached Joint Affidavit of Mark R. Wisenburg and James E. Geiger, and that all such statements are true and correct to the best of my knowledge and belief.

Mark R. Wisenburg

Subscribed and sworn to before me this 22nd day of February, 1985.

Beverly Duncan

BEVERLY DUNCAN  
Notary Public, State of Texas  
My Commission Expires March 3, 1985

State of Texas

County of Harris

I, James E. Geiger, of lawful age, being first duly sworn, upon my oath certify that I have reviewed and am thoroughly familiar with the statements contained in the paragraphs designated by my initials in the attached Joint Affidavit of Mark R. Wisenburg and James E. Geiger, and that all such statements are true and correct to the best of my knowledge and belief.

James E. Geiger

Subscribed and sworn to before me this 22nd day of

February, 1985.

Angela Nichols Smith

ANGELA NICHOLS SMITH  
Notary Public, State of Texas  
My Commission Expires 10/18/88

Mark R. Wisenburg

**Formal Education:**

- 1964        BS - United States Naval Academy
- 1965        U.S. Naval Nuclear Propulsion Training  
            Program

**Experience:**

- 1966 - 1975 - U.S. Navy

Served on active military duty assigned to various nuclear submarines. Completed qualification as Engineering Officer and served one tour as Executive Assistant to the Deputy Chief of Naval Operations (Submarine Warfare).

- 1975 - 1982 - U. S. Tennessee Valley Authority

1975 - 1976 - Principal licensing engineer for the Browns Ferry Nuclear Plant. Responsible for the licensing activity required to return the plant to operation following the 1975 fire and for obtaining the initial operating license for Unit 3.

1976 - 1979 - Supervisor, PWR Projects Section, Regulatory Staff. Responsible for licensing activities for the Sequoyah, Watts Bar, Bellefonte, and Yellow Creek Nuclear Plants including obtaining a CP for Yellow Creek, preparation and submittal of the Bellefonte FSAR and coordination of the Sequoyah OL review.

1979 - 1982 - Staff Nuclear Engineer, Regulatory Staff. Acted as assistant licensing manager for TVA.

- 1982 - Present - Houston Lighting & Power Company

May-Sept. 1982 - Special Assistant to Manager,  
Nuclear Licensing

Sept. 1982 - Present - Manager, Nuclear Licensing



James E. Geiger, P.E.

**Formal Education:**

1961 - BSIE - California State University-Sacramento,  
Sacramento, CA

**Experience:**

1957 - 1972 - Aerojet General Corporation,  
Sacramento, CA

Served in various supervisory & management positions in virtually all parts of the Quality Assurance organization. Assignments included receiving inspection, documentation control, data analysis, trending, design review, procedures & programs, procurement, & quality systems.

1972 - 1974 - Self employed

1974 - 1976 - Vayo Inc., Sacramento, CA

Contract Quality Assurance Engineer

1976 - 1978 - Argonne National Laboratory

QA Engineer

1978 - 1981 - Los Angeles Power Division of Bechtel Power Corp.

Project Quality Assurance Manager - San Onofre Units 1, 2, & 3

Responsibility for quality assurance activities for all project phases, including design, procurement, construction, & start-up.

1981 - Present - Houston Lighting & Power

1981 - 1982 - Project QA Manager, STP

1982 - Present Corporate QA Manager

Professional Engineer (Quality) California 1976

Member of American Society for Quality Control (ASQC)

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HOUSTON LIGHTING & POWER )  
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(South Texas Project, Units 1 )  
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Docket Nos. 50-498 OL  
50-499 OL

CERTIFICATE OF SERVICE

I hereby certify that a copy of Applicants' letter dated February 25, 1985 and "Joint Affidavit of Mark R. Wisenburg and James E. Geiger" have been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid, on this 25th day of February, 1985.

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Atomic Safety and Licensing  
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U. S. Nuclear Regulatory Commission  
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Donald Libran