



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

RELATED CORRESPONDENCE

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NRC

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Charles Bechhoefer, Esq., Chairman
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. James C. Lamb III
Administrative Judge
313 Woodhaven Road
Chapel Hill, NC 27514

Mr. Ernest E. Hill
Administrative Judge
Hill Associates
210 Montego Drive
Danville, CA 94526

In the Matter of
HOUSTON LIGHTING AND POWER COMPANY, ET AL.
(South Texas Project, Units 1 & 2)
Docket Nos. 50-498 and 50-499 OL

Dear Administrative Judges:

The Joint Affidavit from Region IV, filed in this proceeding on December 21, 1984, should be corrected at Paragraphs 18, 21, and 26 therein. The amended text of each of these paragraphs is attached.

Sincerely,

Oreste Russ Pirfo
Counsel for NRC Staff

Enclosure: As stated

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18. Ten violations and one deviation have been documented in NRC inspection reports since mid-1982. Five of these were categorized as Severity Level IV, and five were categorized as Severity Level V. (See 10 CFR Part 2, App. C) The following list identifies these:

82-16-01	Severity Level V	Record storage area requirements
83-02-01	Severity Level V	Record retention requirements
83-11-01	Severity Level V	Procedures for concrete placement
83-17-01	Severity Level IV	Material control and identification
83-20-01	Severity Level V	Record retention requirements
83-20-02	Deviation	Failure to perform on-site hardness tests
83-22-01	Severity Level IV	Failure to take corrective action
83-22-02	Severity Level IV	Failure to take corrective action
83-24-02	Severity Level IV	Failure to follow standard test method
84-02-01	WITHDRAWN	
84-04-01	Severity Level V	Procedures for material control
84-07-01	Severity Level IV	Document control

The severity levels of violations range from I to V with level I being the most severe and level V being the least severe. Severity level IV and V violations are generally considered to be minor except in the case where repetition over a period of time indicates a programmatic breakdown. (DPT)

21. Records indicate that 13 allegations involving activities at STP have been received by the Region IV staff since mid-1982. The allegations are categorized as follows:

- 1 - Lack of Qualification of QA/QC Personnel
- 1 - Efforts in Document Control
- 3 - QA/QC Deficiencies
- 1 - Pay and Status of QC Personnel
- 1 - Falsification of Records
- 1 - Terminated for Complaining about Safety Problem
- 1 - Office of Investigations
- 3 - Improper Construction Practice
- 1 - Intimidation of QC Inspectors

Of the 13 allegations received, sufficient information has been gathered to close eight. The alлегers who considered themselves unjustly terminated were referred to DOL and OSHA. Fact gathering efforts are in progress for investigation of the remaining five. The licensee is involved in efforts to investigate three of the remaining issues and the NRC staff is monitoring those activities. These allegations are categorized as QA/QC deficiencies, improper construction practice and intimidation of QC inspectors. One of the allegations is being investigated by the Office of Investigations. One allegation is under investigation by the NRC staff and will be addressed in a Region IV report.

26. On March 9, 1982, HL&P submitted to NRR (Quality Assurance Branch (QAB), Revision 3 to the Quality Assurance Program (QAP) for remaining design and construction activities on STP. Revision 3 described the previously updated and NRC-approved OAP for the HL&P activities with some minor modifications and the QAPs for Bechtel and EBASCO. Bechtel committed to apply their NRC-approved QA Topical Report BQ-TOP-1, Revision 3A, as modified in Part B of Revision 3 for the engineering, procurement, and construction management activities at STP. EBASCO committed to apply their NRC-approved QA Topical Report ETP-1001, Revision 10a as modified in Part C of Revision 3 for the quality assurance and quality control of the construction services at STP. The QAP has since been periodically revised. Revision 9 is the current issue.