

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF JEROME H. GOLDBERG

I have reviewed the January 17, 1986 Motion of CCANP to reopen the record of Phase II and the documents attached thereto, including the excerpts of the deposition of Mr. Eugene A. Saltarelli. In those deposition pages Mr. Saltarelli mentioned a meeting he had with me in which we discussed the desirability of an independent review of B&R design work on STP. I recall such a meeting between Mr. Saltarelli and myself in late 1980. This is the meeting I mentioned in my testimony of December 5, 1985 at Tr. 15534-35 and 15578.

In that meeting Mr. Saltarelli and I discussed the potential value of third party assessments of engineering work on nuclear projects. Mr. Saltarelli mentioned that he had participated in such a review for NUS on an earlier project. We then discussed the usefulness of such a review at STP and its potential benefit to both of us in performing our respective responsibilities,

particularly since we were both relatively new to the Project. During the course of the meeting, I very likely mentioned to Mr. Saltarelli, as I had to others in 1980-81, that a benefit of such a design review would be that I would be better able to answer questions concerning STP engineering if any were raised in future ASLB hearings.

The CCANP Motion asserts that the Quadrex Review and certain design review work assigned to NUS were "part of an overall litigation strategy agreed upon by HL&P and Brown & Root." CCANP Motion at 14. Neither the Quadrex review nor the NUS work was performed in order to prepare for the ASLB hearing; Mr. Saltarelli and I did not discuss these efforts in the context of planning a strategy for licensing litigation. Rather, our principal focus was on our mutual professional interest in assuring the safe and successful completion of STP engineering and design.

I have read the foregoing portion of this affidavit to Mr. Saltarelli and he generally confirms my recollection of our conversation in 1980.

Jerome H. Goldberg
Jerome H. Goldberg

State of Texas §
 §
County of Matagorda §

Sworn to and subscribed before me this *29th* day of January, 1986.

Mazie D. Hill
Notary Public

MAZIE D. HILL
Notary Public, State of Texas
My Commission Expires *2-2-87*

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CERTIFICATE OF SERVICE

I hereby certify that copies of the letter to the Members of the Licensing Board from Maurice Axelrad dated February 3, 1986, the letter to Mr. Lanny A. Sinkin, Esquire from Jack F. Newman dated February 3, 1986, the letters to Jack R. Newman from Lanny A. Sinkin, Esquire dated January 17, 1986 and January 24, 1986, respectively, and Applicants' Response to "CCANP Motion to Reopen the Phase II Record: IV; For Discovery and to Suspend Further Activity in Phase III" dated February 3, 1986 have been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid on this 3rd day of February, 1986.

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