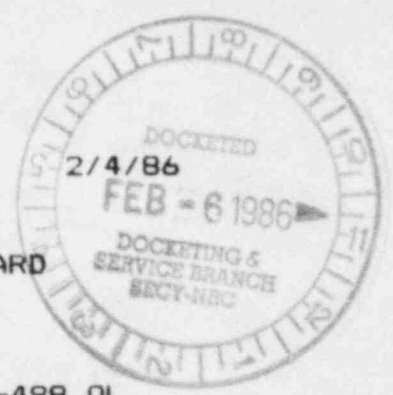


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UNITED STATES CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. (CCANP)
SECOND SET OF INTERROGATORIES TO APPLICANTS

Pursuant to the Licensing Board's November 18, 1985 Order and pursuant to 10 C.F.R. Sections 2.740b, Citizens Concerned About Nuclear Power, Inc. (CCANP) herein propounds Interrogatories to Applicants to be answered in accordance with the following instructions:

Instructions

1. Each interrogatory shall be answered separately and fully as to each of its parts in writing under oath or affirmation, unless it is objected to, in which event the reasons for objection shall be stated in lieu of an answer. The answers shall be signed by the person making them, and the objections by the attorney making them.

2. Each interrogatory response should include all pertinent information known to Applicants, their officers, directors, or employees, their agents, advisors, or counsel. Employees is to be construed in the broad sense of the word, including specifically Houston Lighting and Power, Bechtel, Ewasco, any consultants, sub-contractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors.

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3. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.

4. These interrogatories shall be continuing in nature and subject to supplementing should additional information become available.

Interrogatories

1. Please provide a detailed description of any program in place at the South Texas Nuclear Project at any time since January 1, 1984 to detect the use and/or sale of illegal drugs by employees working on the Project.

2. For each program described in answer to Interrogatory 1, please provide the following information:

a. Whether the program included the use of tests, such as lie detector tests and urinalyses.

b. For those programs including the use of tests, which employee groups were subject to such tests and which were not.

3. Please provide the name, job title, and address of the employees who administered or currently administer the program or programs identified in the answer to Interrogatory 1.

4. Regarding the use of lie detector tests on STNP employees, please:

a. Specify what date lie detector tests were first given in connection with inquiries related to use and/or sale of illegal drugs by STNP employees.

b. Provide all the dates when such tests were administered.

c. For each date identified in answer to Interrogatory 4b, provide the name of the company or companies performing the lie detectors tests.

d. For each date and company identified in Interrogatory 4c, provide the names of the personnel who performed the tests and their employers.

e. Provide the questions that were asked in each test given on the dates identified in answer to Interrogatory 4b.

f. For each date identified in answer to Interrogatory 4b, identify who made the selection of people to be tested.

g. For each date identified in answer to Interrogatory 4b, specify what criteria was used to select the people to be tested.

h. For each date identified in answer to Interrogatory 4b, provide the names of all employees who were given such tests and their positions at the time the lie detector tests were given.

i. For each person identified in answer to Interrogatory 4h, provide the name of the person or persons performing the test on that individual.

5. For each person identified in answer to Interrogatory 4h, state whether said person was considered to have passed or failed the lie detector test regarding the use and/or sale of illegal drugs. If some evaluation category other than "pass" or "fail" was used, please specify what evaluations were used and provide the evaluation for each person identified in Interrogatory 4h as to the use and/or sale of illegal drugs.

6. If a lie detector test indicated possible or actual use and/or sale of illegal drugs, what procedure or procedures were followed

to further investigate such evidence?

7. If a lie detector test indicated possible or actual use and/or sale of illegal drugs, what procedure or procedures were to be followed regarding the employee tested?

8. For each person identified in answer to Interrogatory 4h whose evaluation indicated possible or actual use and/or sale of illegal drugs, please detail what subsequent actions, including termination, were taken and the personnel involved in taking those actions.

9. For each person terminated as a result of the lie detector tests identified in answer to Interrogatory 4, please provide:

a. The name, position, and employer on the Project at the time of their termination of each person terminated.

b. The name, position, and employer of the person or persons who evaluated the results of their test.

c. The last known address and telephone number of each person terminated.

d. The name, position, and employer of the person responsible for their termination.

10. For each person identified in the answer to Interrogatory 4h, identify as completely as possible any other people said person identified as possibly involved in the use and/or sale of illegal drugs.

11. For each person identified in the answer to Interrogatory 10, please specify what further investigation was conducted regarding

the use and/or sale of illegal drugs by that person and specify the result of that investigation.

12. Regarding the Operations Group at STNP, please provide the following information:

- a. The date said group was formed.
- b. The functions of said group.
- c. The names and employment history (date hired, positions held, date employment ended) of all personnel who were members of this group since the inception of the group.
- d. The identity and last known address of any member of this group terminated for reasons related in any way to the use and/or sale of illegal drugs.

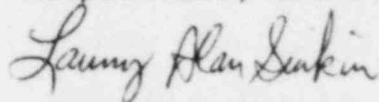
13. Please identify any of the employees in interrogatory 4h who implicated members of the Operations Group or the Operations Group generally in the use and/or sale of illegal drugs.

14. Please identify which members of the Operations Group were implicated by the individuals identified in response to Interrogatory 13.

15. Please provide the names and positions of any member of the Operations Group, not identified in answer to Interrogatory 14, implicated at any time in the use and/or sale of illegal drugs at STNP.

16. Please detail what actions were taken with regard to each individual identified in response to Interrogatories 14 and 15.

Respectfully submitted,



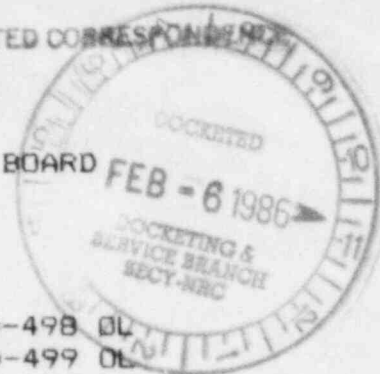
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Counsel for Intervenor,
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Nuclear Power, Inc.

Dated: February 4, 1986
Washington, D.C.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

Docket Nos. 50-498 DL
50-499 DL

CERTIFICATE OF SERVICE

I hereby certify that copies of CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. (CCANP) SECOND SET OF INTERROGATORIES TO APPLICANTS were served by messenger (*) or be deposit in the U.S. Mail, first class postage paid to the following individuals and entities on the 4th day of February 1986.

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Frederick J. Shon
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Atomic Safety and Licensing
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Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555