

OCT 10 1985

MEMORANDUM FOR: W. J. Dircks
Executive Director for Operations

FROM: Robert D. Martin
Regional Administrator

SUBJECT: SOUTH TEXAS LITIGATION REVIEW - REVISED INFORMATION

During the October 1 briefing of the Commission, I spoke from memory as to the size of the litigation record that HL&P would review. I believe that I stated that the record consisted of 4 billion pages. This is in error. The following gives a more accurate breakdown of the size of the task to be faced. Although formidable, it is not the magnitude that I led the Commission believe during the briefing.

An estimated 32 million pages were generated in preparation for a lawsuit between Brown & Root, Halliburton, and the owners of the South Texas Project (STP). This includes such discovery documents as depositions, interrogatories, and reports prepared by experts who were expected to testify in the litigation. Certain records will be screened and not reviewed when it is determined that it is not likely to contain safety-related information; examples include financial records or the depositions of nontechnical individuals on nontechnical matters. This will reduce the volume of material needing review to between 100,000 to 200,000 pages. The program is expected to consume about 16 man-years of engineering effort, including approximately 40 experienced SLI engineers assisted by a select group of HL&P engineers.

In addition to this memo, if I should be preparing any other information to correct this information before the Commission, please let me know and I will do so promptly.

ORIGINAL SIGNED BY
ROBERT D. MARTIN

Robert D. Martin
Regional Administrator

cc:
V. Stello, DEDROGR
H. R. Denton, NRR
J. E. Taylor, IE
G. H. Cunningham, ELD

bcc:
R. P. Denise
E. H. Johnson
~~W. L. Brown~~
G. L. Constable

RIV:RA ^m
RDMartin:jc
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