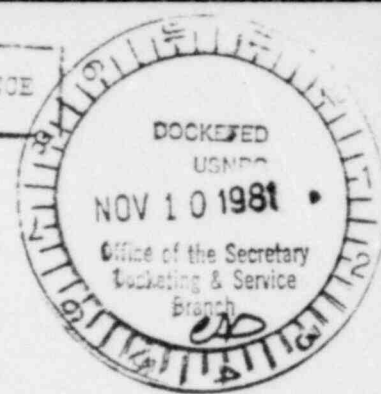


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF

HOUSTON LIGHTING AND POWER
COMPANY, ET AL.
(South Texas Project,
Units 1 and 2)Docket Nos. 498 OL
499 OL

INTERROGATORIES FROM CITIZENS CONCERNED ABOUT NUCLEAR POWER TO HOUSTON LIGHTING AND POWER, ET AL., APPLICANTS PURSUANT TO MEMORANDUM AND ORDER (Scheduling Prehearing Conference and Evidentiary Hearing on Transition Period Construction Activities) DATED OCTOBER 30, 1981

Preface

On October 30, 1981, the Board issued a Memorandum and Order which scheduled an evidentiary hearing to commence on Tuesday, December 8, 1981 in Austin, Texas. See Memorandum and Order (Scheduling Prehearing Conference and Evidentiary Hearing on Transition Period Construction Activities) dated October 30, 1981, at p. 5. The Board scheduled discovery to commence immediately, Id. Pursuant to the Memorandum and Order of October 30, 1981 and Section 2.740b of the Commission's Rules of Practice, Citizens Concerned About Nuclear Power propounds the following interrogatories to Houston Lighting and Power, et al., Applicants.

I. Instructions

1. Each interrogatory must be answered separately and fully in writing under oath or affirmation by the person or persons making them on or before November 18, 1981, Id.

2. These interrogatories shall be deemed continuing, so as to require additional answers if after answering such interrogatories Applicants obtain information upon the basis of which Applicants know the response though correct when made is no longer true and the circumstances are such that a failure to amend the response is in substance a knowing concealment.

3. If any response is withheld, in whole or in part, for any reason, including but not limited to any claim of privilege, confidentiality or trade secret, set forth the basis upon which such response is withheld, and include in such explanation a statement of what is being withheld and the identities of all persons who have knowledge of the matters being withheld.

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II. Interrogatories

1. Please provide the dates when Brown and Root, Inc. (B&R) will no longer be performing the following functions at the South Texas Nuclear Project:

- a. Design
- b. Engineering
- c. Construction Management
- d. Construction
- e. Quality Assurance
- f. Quality Control

2. What was the basis for the Houston Lighting and Power decision to terminate B&R from each function set forth as a. through f. in Interrogatory 1?

3. Regarding functions a. through f. in Interrogatory 1, please specify the following:

- a. the functions Bechtel Corporation has agreed to perform
- b. the form of the Bechtel Corporation commitment to perform each function, e.g. commitment letter signed, contract signed, etc.
- c. the terms and condition under which Bechtel Corporation has agreed to perform each function.

4. Please give numerical totals in each area set out as a. through f. in Interrogatory 1 for the number of personnel given notice of termination of employment since the date Houston Lighting and Power notified B&R of HL&P's intent to terminate B&R's responsibilities for design, engineering, and construction management:

- a. by HL&P
- b. by B&R

5. Please give numerical totals in each area set out as a. through f. in Interrogatory 1 for the number of personnel giving notice of their intent to terminate employment since the date Houston Lighting and Power notified B&R of HL&P's intent to terminate B&R's responsibilities for design, engineering, and construction management:

- a. with HL&P
- b. with B&R

6. Is B&R still authorized to hire additional personnel to work on the South Texas Nuclear Project?

7. If the answer to Interrogatory 6 is "yes" in what areas set out as a. through f. in Interrogatory 1 is such additional hiring authorized?

8. Has B&R placed a hiring freeze on new employees for the South Texas Nuclear Project?

9. If the answer to Interrogatory 8 is "yes," please specify:
- a. what areas set out as a. through f. in Interrogatory 1 such hiring freeze is in place
 - b. when the hiring freeze was put in place for each area.

10. What steps or actions, if any, have HL&P, B&R, and/or Bechtel Corporation taken to insure the morale during the transition period of QA and QC personnel now employed by B&R?

11. What steps or actions, if any, have HL&P, B&R, and/or Bechtel Corporation taken to insure the morale during the transition period of B&R personnel in areas set out as a. through d. in Interrogatory 1?

12. When was the Quadrex report received by HL&P?

13. When was the Quadrex report received by B&R?

14. Which findings in the Quadrex report related to safety and/or licenseability might affect transition period construction as specified in the October 16 letter?

15. For each finding listed in response to Interrogatory 14, specify the steps or actions taken by HL&P to address and resolve the deficiency.

16. If not previously answered, please specify what steps or actions have been taken by HL&P to identify non-safety-related items which should have been classified as safety-related.

17. Please list all items reclassified from non-safety-related safety-related since HL&P received the Quadrex report.

18. Please list, with an identification for each item as safety-related or non-safety-related at the time of performance, all construction items performed:

- a. since HL&P received the Quadrex report
- b. since the date HL&P notified B&R of HL&P's intent to terminate B&R's responsibilities for design, engineering, and construction management

19. Please list:

- a. all items of construction approved by the Nuclear Regulatory Commission for performance after the NRC received the Quadrex report.
- b. the date each item was performed or identification of performance as still pending.

20. Does HL&P propose to have Bechtel Corporation address and resolve the Quadrex finding that B&R failed to adequately distinguish between safety-related and non-safety-related items of construction?

21. If the answer to Interrogatory 20 is "yes," how long does Bechtel estimate it will need to resolve this finding?

22. Does HL&P propose to have Bechtel Corporation address and resolve the findings listed in response to Interrogatory 14?

23. If the answer to Interrogatory 22 is "yes," please give Bechtel's estimate for the length of time to resolve each finding.

24. Please give:

a. specific identification of the two findings in the Quadrex report reported by HL&P to the NRC pursuant to 10 C.F.R. Section 50.55(e)

b. the identities of persons who participated in the decision making process which led to reporting these two items

c. the identities of the persons who participated in the decision making process which led to the release of the Quadrex report to the Board, NRC staff, and Intervenor representatives.

25. Please list any steps or actions taken by HL&P to insure the quality of safety-related construction to be performed during the transition period can later be verified.

26. Please identify all measures taken to protect partially completed work at the South Texas Nuclear Project during previously issued stop work orders.

27. What items of partially completed, safety-related work (as this term was previously used by B&R) are subject to deterioration if all safety-related work is stopped? Describe fully the item and the potential for deterioration.

28. What are the relative safety implications of continuation of only such transition work outlined in the October 16 letter as have already been commenced as of that date?

29. Please list any studies, reports, evaluations, or similar documents concerning possible deficiencies in either the construction or QA/QC programs at the South Texas Nuclear Project prepared by the Bechtel Corporation.

30. Please list all studies, reports, evaluations, or similar documents concerning possible deficiencies in either the construction or QA/QC programs at the South Texas Nuclear Project prepared by an entity other than Bechtel Corporation.

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
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CERTIFICATE OF SERVICE

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I hereby certify that copies of INTERROGATORIES FROM CITIZENS CONCERNED ABOUT NUCLEAR POWER TO HOUSTON LIGHTING AND POWER, ET AL., APPLICANTS PURSUANT TO MEMORANDUM AND ORDER (Scheduling Prehearing Conference and Evidentiary Hearing on Transition Period Construction Activities) DATED OCTOBER 30, 1981 have been served on the following individuals and entities by deposit in the United States Mail, first class, postage prepaid, or Special Delivery as indicated by asterisk, on this 7th day of November, 1981.

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