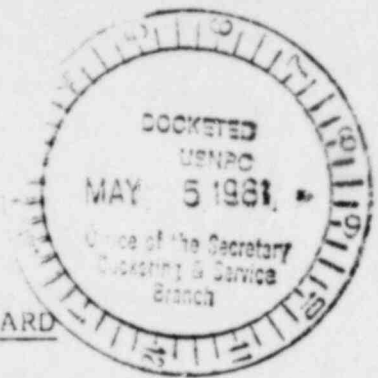


RELATED CORRESPONDENCE

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



In the Matter of)

HOUSTON LIGHTING AND POWER CO.)
(South Texas Project, Units 1)
and 2))

Docket No. 50-498
50-499

CEU INTERROGATORIES TO THE NRC STAFF
BASED ON THE PARTIAL SER

Pursuant to the Licensing Board's Order of April 21, 1981, CEU poses the following interrogatories to the NRC Staff, to be answered under oath. Please identify the person providing each answer.

1. Is the Partial SER (NUREG-0780) based on any review other than the February 17-19, 1981, visit by the NRC Staff to the corporate office of HL&P in Houston and the plant site near Bay City? Detail any and all other visits, interviews, studies, or documents involved in preparation of NUREG-0780.
2. Please provide a copy of NUREG-0731, "Guidelines for Utility Management Structure and Technical Resources," referred to in the Partial SER.
3. With regard to the Staff's preparation of the Partial SER, provide a schedule with the following information:
 - a. the Staff persons involved in the February 17-19, 1981 visit to HL&P offices and the plant site;

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- b. the Staff persons involved in preparing NUREG-0780 and the responsibilities of each;
 - c. the person-hours devoted by each individual listed under parts a&b above to the investigation, review and all other preparation of NUREG-0780; and
 - d. the HL&P and Brown and Root persons involved in the February 17-19, 1981, visits or otherwise contacted by the NRC Staff in the course of its review of the matters discussed in the Partial SER. In each case, provide the name, title, and function of the HL&P or B&R person, the date of the contact, and the substance of the contact.
4. Provide a copy of any agenda, checklist, analysis, discovery request (formal or informal), or production request (formal or informal) utilized by the Staff in its preparation for the February 17-19, 1981, visits and any other visits related to the preparation of NUREG-0780. Provide any responses that have been provided by the applicant or its contractors or agents to such discovery or production requests.
5. Provide a copy of any correspondence (or notes or memos of conversations) between the Staff and Applicant or its contractors or agents prepared between September 22, 1980, and February 17, 1981, relating to the visits which occurred on February 17-19, 1981, the preparation of the Partial SER, or to any matters considered by the Staff in preparing the SER.
6. Who on the NRC staff will continue to monitor the developments in the areas of management capability and the quality assurance programs?

7. Define and detail the duties, responsibilities, job functions and qualifications for a Shift Technical Advisor.
8. Recognizing that the NRC staff has not completed its review of the listing of systems, structures and components that should be under the control of the quality assurance program, provide a description of the work in progress on that subject. Separately designate those portions and components which the NRC staff believes to be "important to safety."
9. Produce a copy of all notes, documents, and exhibits prepared by the NRC Staff pertaining to the February 17-19, 1981, visit. We have a copy of the formal trip report itself, which need not be included. However, all drafts of the trip report should be included.
10. On page 13-2 there appears the statement, "He (Manager, South Texas Project) interfaces with the nuclear steam supply system project manager, and the architect-engineer/contractor project manager for management decisions affecting the STP plant." With regard to that statement, answer the following:
 - a. what is meant by "interfaces"?
 - b. how are decisions arrived at during the interfacing process?
 - c. must each of the decisions made in the above process be cleared by the Executive Vice President or the Vice President, Nuclear Engineering and Construction, or any other level of HL&P management? If so, which level?

14. On page 13-10 there appears the statement that, "The principal function of the existing STP QA organization is to provide programmatic direction to the Brown & Root QA organization." With regard to that statement answer the following:
- a. What does the statement mean? In particular, describe in detail what is meant by "programmatic direction," giving all examples that were considered in reaching that conclusion.
 - b. If such programmatic direction is written, provide a copy of each such document.
 - c. Define, describe, and detail (with charts) the Brown and Root QA/QC organization.
 - d. Detail the changes (including personnel) that have occurred in Brown & Root QA/QC organization since April 30, 1980.
 - e. Define and describe what HL&P people actually do with regard to QA/QC. Define and describe all positions and daily responsibilities.
 - f. Does HL&P conduct any actual QC investigations or inspections? What is their frequency and cause?
15. What actual changes will occur in both HL&P and B&R QA/QC operations as a result the implementation of the organization detailed in Figure 13.3?
16. Page 13-13 notes that plant personnel "will conduct much of the preoperational testing of Unit 1." What aspects will they conduct and who will conduct the rest?
17. Three positions on Figure 13.4 show "1981" rather than a name. Have those individuals been selected? If so, who are they and what are their qualifications? If not, when will they be chosen?

14. On page 13-10 there appears the statement that, "The principal function of the existing STP QA organization is to provide programmatic direction to the Brown & Root QA organization." With regard to that statement answer the following:
- a. What does the statement mean? In particular, describe in detail what is meant by "programmatic direction," giving all examples that were considered in reaching that conclusion.
 - b. If such programmatic direction is written, provide a copy of each such document.
 - c. Define, describe, and detail (with charts) the Brown and Root QA/QC organization.
 - d. Detail the changes (including personnel) that have occurred in Brown & Root QA/QC organization since April 30, 1980.
 - e. Define and describe what HL&P people actually do with regard to QA/QC. Define and describe all positions and daily responsibilities.
 - f. Does HL&P conduct any actual QC investigations or inspections? What is their frequency and cause?
15. What actual changes will occur in both HL&P and B&R QA/QC operations as a result the implementation of the organization detailed in Figure 13.3?
16. Page 13-13 notes that plant personnel "will conduct much of the preoperational testing of Unit 1." What aspects will they conduct and who will conduct the rest?
17. Three positions on Figure 13.4 show "1981" rather than a name. Have those individuals been selected? If so, who are they and what are their qualifications? If not, when will they be chosen?

18. Page 13-13 refers to the fact that HL&P uses "a six-shift rotation" which "would provide for a minimum of five days of training in each 42-day shift cycle."

Explain what this means. In particular, what is "a six-shift rotation," and why would it provide for the training indicated.

19. At page 13-8, there appears the following statement:

HL&P stated that protection of public health and safety is of paramount importance and this will be communicated to the HL&P staff throughout the lifetime of the plant, emphasizing the responsibility of each employee to perform his or her job in a way that assures public safety.

- a. Is the NRC Staff aware of any HL&P statements prior to April 30, 1980, in which the company recognized the importance of protecting the public health and safety? If so, please provide a copy of each such statement.
- b. Did HL&P make a commitment to protect the public health and safety when it applied for and received a construction permit?
- c. How is the HL&P recognition of the importance of protecting the public health and safety as discussed by the NRC Staff different from previous recognitions or commitments of which the Staff is aware?
- d. Is the Staff aware of any efforts by HL&P prior to April 30, 1980, to communicate the importance of protecting the public health and safety to the HL&P Staff? If so, please describe such efforts and provide copies of any such communications.
- e. How will future HL&P communications to its staff concerning the importance of protecting the public health and safety be different from such communications prior to April 30, 1980?
- f. Will HL&P assure that the importance of protecting the public health and safety is communicated to Brown and Root personnel? Precisely how will HL&P accomplish that goal? How will HL&P personnel themselves be involved in those communications?

- g. Will the importance of protecting the public health and safety be communicated to both construction and QA/QC personnel?
 - h. Please detail the manner and circumstances in which the importance of protecting the public health and safety will be communicated and provide copies of such communications available to the NRC Staff.
20. What plants have been visited by HL&P personnel to help plan for transition from construction to operation?
What personnel made those visits?
21. What consultants has HL&P employed to study the technical support structure for transition from construction to operation?
22. Did the NRC Staff meet with the HL&P President for preparation of NUREG-0780? If so, provide the notes of that meeting.
23. How did the NRC Staff investigate the attitudes and morale of HL&P or B&R individuals involved in the actual QA/QC program for preparation of NUREG-0780? Provide copies of any relevant documents, including specifically any surveys and survey results reviewed by the Staff in reaching its conclusions on QA/QC attitudes and morale, and identify all HL&P and B&R employees contacted by the NRC Staff in its Investigation of QA/QC attitudes and morale.
24. Define and detail any and all acts, apart from structural changes, taken by HL&P designed to change the attitudes of individuals working in the QA/QC program.

25. How many times had the HL&P QA Program Evaluation Committee met prior to issuance of the Partial SER?
Has the NRC Staff reviewed the work of that committee?
What is the NRC's understanding of the purpose and work program of that committee?
26. Has the NRC reviewed the QA/QC indoctrination and training programs of HL&P?
27. Is any portion of NUREG-0780 intended to be an evaluation of HL&P's character and competence. If so, list the paragraphs which provide that evaluation. Describe how your review was designed to allow that evaluation and how the information reviewed supports the conclusions reached.
28. Provide a copy of all written policies, procedures, and instructions implementing HL&P's QA program which were reviewed by the NRC Staff.

Respectfully submitted

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Counsel for Citizens for
Equitable Utilities, Inc.

May 4, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)
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HOUSTON LIGHTING AND POWER CO.)
(South Texas Project, Units 1)
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CERTIFICATE OF SERVICE

I hereby certify that copies of the "CEU Interrogatories to the NRC Staff Based on the Partial SER," have been hand-delivered and mailed, postage pre-paid, this 4th day of May, 1981, to the following:

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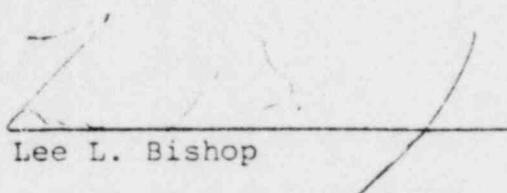
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