

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
ASPC

In the Matter of

HOUSTON LIGHTING & POWER
COMPANY, ET AL.

(South Texas Project, Units
1 and 2)

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Docket No. 50-498-OL
DOCK 50-498-OL
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STATE OF TEXAS'S NOTICE FOR
DEPOSITION OF QUADREX CORPORATION
ON WRITTEN INTERROGATORIES

To All Parties:

Please take note that the deposition on written interrogatories of Quadrex Corporation, 1700 Dell Avenue, Campbell, California, will be taken before the officer whose name, description, title and address are shown on Exhibit 2 attached to this Notice. The deposition will be taken on August 22, 1983. The questions that will be posed by the State of Texas at the deposition are the ones shown on Exhibit 1 attached to this Notice.

Respectfully submitted,

JIM MATTOX
Attorney General of Texas

DAVID R. RICHARDS
Executive Assistant Attorney
General

JIM MATHEWS
Assistant Attorney General
Chief, Environmental Protection
Division

Brian E. Berwick
BRIAN E. BERWICK (SBN 02258500).
Assistant Attorney General
Environmental Protection Division

P. O. Box 12548
Austin, Texas 78711
(512) 475-4143

Exhibit 1

QUESTIONS TO BE ANSWERED BY QUADREX CORPORATION

1. Please provide copies of brochures or other material used by the Quadrex Corporation as of January 1, 1981 to describe Quadrex's work, capabilities, etc. to potential clients.
2. Please define the term "technical adequacy or inadequacy" as used by Quadrex in the Quadrex/STNP study of May 1981, Volume I, Section 1.0, page 1-2.
3. At the time Quadrex performed the STNP study, why did Quadrex not evaluate what was reportable to the Nuclear Regulatory Commission?
4. Please identify the Quadrex employee in charge of each discrete evaluation area in the Quadrex Report, e.g. Civil/Structural, Mechanical, Electrical, etc.
5. Who coordinated the entire audit for Quadrex?
6. Did the Quadrex review confine itself to drawings which had not yet been released for use by construction? If so, why?
7. Please explain the relationship between the Nuclear Services Corporation and the Quadrex Corporation
 - a. prior to January 1, 1981
 - b. in the period January 1, 1981 through May 7, 1981
 - c. after May 7, 1981
8. Based on what Quadrex knows now, are there any changes the Quadrex Corporation would make in any finding, including generic finding, in the Quadrex Report?
9. Please identify those generic findings which Quadrex believes are unsupported by the underlying data.
10. Regarding the Bechtel reviews of the Quadrex Report:
 - a. Has Quadrex reviewed the March 1982 Bechtel report on the Quadrex Report?
 - b. Has Quadrex reviewed the Bechtel review of the Quadrex Report referred to as EN-619?
 - c. Please identify and provide copies of any documents which record the Quadrex responses to the two Bechtel reviews.
 - d. Please detail any points in the Bechtel reviews with which Quadrex disagrees.

11. Finding 3.1(a) of the Quadrex Report states: "Assigned responsibility for systems engineering is only a recent development."

a. Does this sentence refer to the Brown and Root System Design Assurance Group? If not, please explain the "recent development."

b. Is it correct that Quadrex reviewers did not talk to members of the B&R System Design Assurance Group?

c. If the answer to interrogatory 11b is "yes," please explain why Quadrex reviewers did not talk to this group.

d. Based on what Quadrex knows now, does Quadrex take the position that the B&R Systems Design Assurance Group did have responsibility for systems integration and overview in the January-May, 1981 period?

e. Based on what Quadrex knows now, is it the position of Quadrex that the B&R System Design Assurance Group constituted and "effective systems integration and overview function" within the B&R design process? (Finding 3.1(a)) Please explain your answer.

12. In the first Bechtel assessment of the Quadrex Report ("An Assessment of the Findings in the Quadrex Corporation Report dated May 1981" issued by Bechtel in March 1982) the Bechtel reviewers state: "there also existed a Physical Design Assurance Group." (at 2-8)

a. Did Quadrex reviewers talk to members of this Physical Design Assurance Group?

b. If the answer to interrogatory 12a is "no," please explain why not.

c. Based on what the Quadrex Corporation knows now, is it the position of the Quadrex Corporation that the B&R Physical Design Assurance Group had responsibility for systems integration and overview in the January-May, 1981 period?

d. Based on what the Quadrex Corporation knows now, is the position of the Quadrex Corporation that the B&R Physical Design Assurance Group constituted an "effective systems integration and overview function" within the B&R design process? (Quadrex finding 3.1(a))

13. Referring to the Quadrex rankings - "Most Serious" etc.-:

a. How were these rankings chosen?

b. Please identify and provide all correspondence or other record of communication between HL&P and Quadrex regarding selection of the ranking categories.

c. For the "Most Serious" ranking, please explain what Quadrex meant by:

(1) "the finding would prevent the obtaining of a license"

(2) "the finding would produce a significant delay in getting a license"

(3) "the finding addresses a matter of serious concern to the NRC at this time."

14. Did Quadrex use the term "generic" to indicate the particular problem identified as generic could exist in designs already released for construction, and/or could exist in construction already completed?

15. Does Quadrex agree with the following statements?:
"The significance of the generic findings turns entirely on the nature of the underlying discipline finding." "The discipline findings did not indicate that the design was deficient but rather that Brown & Root was having difficulty in completing the engineering process." Please explain any agreement or disagreement.

16. Why did Mr. Stanley assume that the Quadrex Report would be provided to the NRC soon after it had been given to HL&P? (Statement to the NRC.)

17. Did the Quadrex Corporation at any time communicate with the NRC regarding the findings of the Quadrex Report prior to August 1981? If so, please identify the persons who communicated with the NRC and the substance of their communication. Please produce any documentation of those communications.

Exhibit 2

The deposition officer will be Valerie A. Fitch.

This person is a certified shorthand reporter and notary public in and for the State of California, County of Santa Clara.

This person's work address, and the place where the deposition will be taken, are:

586 North First St.
Suite 240
San Jose, CA 95112

The date and time of the deposition will be August 22, 1983, at 9:00 o'clock A.M.

CERTIFICATE OF SERVICE

I hereby certify that copies of St. of Texas's Notice For Deposition of Quadrex Corporation on Written Interrogatories and *State's Request For Subpoena* were served by deposit in the United States Mail, first class postage paid to the following individuals and entities on the 8th day of August, 1983 except that service on the single-asterisked people was by federal express and on the double asterisked people was by hand.

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