

RELATED CORRESPONDENCE

LAW OFFICES

LOWENSTEIN, NEWMAN, REIS & AXELRAD

1025 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

202-862-8400

JACK R. NEWMAN
HAROLD F. REIS
MAURICE AXELRAD
KATHLEEN H. SHEA
J. A. BOUKNIGHT, JR.
MICHAEL A. BAUSER
DOUGLAS G. GREEN
DAVID G. POWELL

E. GREGORY BARNES
ANNE W. COTTINGHAM
STEVEN P. FRANTZ
JILL E. GRANT
FREDERIC S. GRAY
ALVIN H. GUTTERMAN
HOLLY N. LINDEMAN
DAVID B. RASKIN
DONALD J. SILVERMAN

'82 APR -8 AM 1:38

OFFICE OF THE
DOCKETING & SERVICE
CHARGE

ROBERT LOWENSTEIN
OF COUNSEL

April 5, 1982

Charles Bechhoefer, Esquire
Chief, Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. James C. Lamb, III
Administrative Judge
313 Woodhaven Road
Chapel Hill, North Carolina 27514

Ernest E. Hill
Administrative Judge
Lawrence Livermore Laboratory
Post Office Box 808, L-46
Livermore, California 94550



Re: Houston Lighting & Power Co. et al
South Texas Project, Units 1 & 2
Docket Nos. STN-50-498, STN-50-499

Gentlemen:

In accordance with the schedule discussed at the hearing on February 10, 1982 (Tr. 10379), enclosed is the following testimony to be presented on behalf of Applicants:

(1) Testimony of Messrs. Jerome H. Goldberg, Burton L. Lex and John Crnich regarding the management of the South Texas Project; and

(2) Testimony of Messrs. James E. Geiger, Donald T. Krisha and Clyde L. Hawn regarding the quality assurance program for the South Texas Project.

DSO
1/1

8204130232 820405
PDR ADDCK 05000498
T PDR

Charles Bechhoefer, Esquire
Dr. James C. Lamb, III
Ernest E. Hill
Page Two
April 5, 1982

Relatedly, Applicants plan to introduce the following exhibits:

(1) Letter from Mr. Goldberg to Mr. Tedesco of the NRC, dated December 10, 1981, and its enclosure entitled "Summary of Bechtel's Nuclear Power Plant Experience." (Applicants' Exhibit 52)

(2) Letter from Mr. Goldberg to Mr. Tedesco, dated March 15, 1982, and its enclosure entitled "Summary of Ebasco's Nuclear Power Plant Experience." (Applicants' Exhibit 53)

(3) Letter from Mr. Goldberg to Mr. Tedesco, dated December 11, 1981, and its enclosures entitled "Transition Program Description for South Texas Project Engineering and Construction Management." (Applicants' Exhibit 54)

(4) Letter from Mr. Goldberg to Mr. Tedesco, dated March 9, 1982, and its enclosure, Revision 3 of the Quality Assurance Program Description (QAPD) for the design and construction phase of the South Texas Project. (Applicants' Exhibit 55)

(5) Bechtel's Topical Report BQ-TOP-1, Rev. 3A, the Bechtel Quality Assurance Program for Nuclear Power Plants, which is incorporated by reference in Revision 3 of the QAPD for STP. (Applicants' Exhibit 55A)

All of the foregoing exhibits were previously served on the Board and the parties. Bechtel's Topical Report BQ-TOP-1, Rev. 3A was served on the parties as part of Revision 2 of the QAPD, which was enclosed with a letter from Mr. Goldberg to Mr. Tedesco, dated December 11, 1981.

As set forth in Mr. Newman's letter to the Board of March 10, when the hearing resumes on April 20, we are planning to present the testimony in the following sequence:

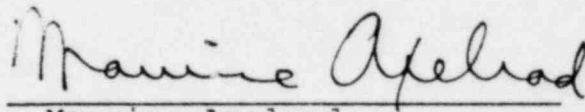
(1) Testimony of Messrs. Goldberg, Lex and Crnich regarding management of the STP;

Charles Bechhoefer, Esquire
Dr. James C. Lamb, III
Ernest E. Hill
Page Three
April 5, 1982

(2) Testimony of Messrs. Geiger, Krisha and Hawn regarding the QA program for the STP; and

(3) Testimony of Messrs. Goldberg and Dewease regarding the operation of the STP.

Respectfully submitted,


Maurice Axelrad

Of Counsel

Lowenstein, Newman, Reis
& Axelrad
1025 Connecticut Avenue, NW
Washington, D. C. 20036

Baker & Botts
3000 One Shell Plaza
Houston, Texas

Attorneys for HOUSTON LIGHTING &
POWER COMPANY, Project Manager of
the South Texas Project, acting
herein on behalf of itself and the
other Applicants, CITY OF SAN
ANTONIO, TEXAS, acting by and
through the City Public Service
Board of the City of San Antonio,
CENTRAL POWER AND LIGHT COMPANY
and CITY OF AUSTIN, TEXAS.

cc: Certificate of Service

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|-------------------------------|---|-----------------------|
| In the Matter of |) | |
| |) | |
| HOUSTON LIGHTING AND POWER |) | Docket Nos. 50-498 OL |
| COMPANY, <u>ET AL.</u> |) | 50-499 OL |
| |) | |
| (South Texas Project, Units 1 |) | |
| and 2) |) | |

CERTIFICATE OF SERVICE

I hereby certify that copies of Applicants' letter to the Atomic Safety and Licensing Board dated April 5, 1982, and its enclosures entitled "Testimony of J. H. Goldberg, B. L. Lex and J. Crnich" and "Testimony of J. E. Geiger, D. T. Krisha and C. L. Hawn" have been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid on this 5th day of April, 1982.

Charles Bechhoefer, Esq.
Chief Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James C. Lamb, III
Administrative Judge
313 Woodhaven Road
Chapel Hill, NC 27514

Ernest E. Hill
Administrative Judge
Lawrence Livermore Laboratory
University of California
P.O. Box 808, L-46
Livermore, CA 94550

Mrs. Peggy Buchorn
Executive Director
Citizens for Equitable
Utilities, Inc.
Route 1, Box 1684
Brazoria, TX 77422

Brian Berwick, Esq.
Assistant Attorney General
for the State of Texas
Environmental Protection
Division
P.O. Box 12548, Capitol Station
Austin, TX 78711

William S. Jordan, III, Esq.
Harmon & Weiss
1725 I Street, N.W.
Washington, D.C. 20006

Kim Eastman, Co-coordinator
Barbara A. Miller
Pat Coy
Citizens Concerned About
Nuclear Power
5106 Casa Oro
San Antonio, TX 78233

Lanny Sinkin
2207-D Nueces
Austin, TX 78705

Jay M. Gutierrez, Esq.
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Thomas B. Hanson Jr.