

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

'82 APR 12 PM 2:06

In the Matter of	§	
	§	
HOUSTON LIGHTING & POWER COMPANY	§	Docket No. 50-466
	§	
(Allens Creek Nuclear Generating	§	
Station, United 1)	§	

HOUSTON LIGHTING & POWER COMPANY'S ANSWERS TO
INTERVENOR DOHERTY'S SECOND AND THIRD SETS OF
INTERROGATORIES, QUESTIONS 29 AND 8 RESPECTIVELY, RE QUADREX

Pursuant to the Board's Order of March 31, 1982
with respect to Mr. Doherty's Motion to Compel Discovery
From Applicant, HL&P herein sets forth its answers to
certain interrogatories from Doherty Interrogatory Sets Two
and Three:

DOHERTY INTERROGATORY SET 2, INTERROGATORY NO. 29:

Prior to the Quadrex report, was Applicant aware
that B&R had a continuing policy of assuming work performed
by suppliers such as EDS Nuclear and Westinghouse could be
assumed correct? (See: Report p. 3-3)

(a) Did Applicant agree with this policy if they
knew about it?

(b) Is it set forth in any documents that HL&P is
opposed to this policy prior to the Quadrex report?

(c) If there are documents as requested in (b)
above, please list them and make them available to this
Intervenor.

ANSWER:

29. With respect to work performed by EDS (a sub-contractor only to Brown & Root at STP), HL&P was aware that Brown & Root determined that EDS had an approved QA Program pursuant to 10 C.F.R. Part 50, Appendix B. The EDS program was reviewed and approved by Brown & Root. Periodic audits were conducted to document that EDS engineering activities were in compliance with its QA Program.

With respect to NSSS work activities performed by Westinghouse (a contractor only to HL&P at STP), HL&P determines that Westinghouse has an approved QA Program pursuant to 10 C.F.R. Part 50, Appendix B. The Westinghouse Program is reviewed by HL&P and periodic audits are conducted to document that Westinghouse engineering activities are in compliance with its QA Program.

Safety-related services supplied by other sub-contractors would be subject to the same review process as described above for EDS and Westinghouse.

29(a). Yes.

29(b). No.

29(c). See answer to Interrogatory 29(b).

DOHERTY INTERROGATORY SET 3, INTERROGATORY NO. 8:

In Sec. 3.1(g) of the Report, at p. 3-10, it states design manual or individual engineer log-books to record key bases, assumptions or decisions are especially crucial for the first designed plant for an architect-engineer.

(a) Prior to start of construction, was Applicant informed this would be Applicant's procedure?

(b) Will this be the procedure at ACNGS?

(c) Did Applicant ever suggest these manuals or log-books prior to Quadrex? If so, when, and to what B&R groups?

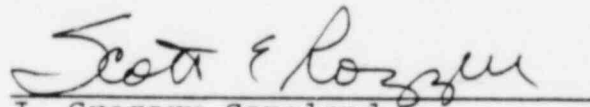
ANSWER:

8(a). No.

8(b). No.

8(c). No.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that copies of Applicant's Answers to Intervenor Doherty's Second and Third Sets of Interrogatories, Questions 29 and 8 respectively, re Quadrex in the above-captioned proceeding were served on the following by deposit in the United States mail, prepaid, or by hand-delivery this 6th day of April, 1982.

Sheldon J. Wolfe, Esq., Chairman
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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Hon. Charles J. Dusek
Mayor, City of Wallis
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Wallis, Texas 77485

Hon. Leroy H. Grebe
County Judge, Austin
P. O. Box 99
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STATE OF TEXAS *l*

COUNTY OF HARRIS *l*

BEFORE ME, the undersigned authority, on this day personally appeared J.H. Goldberg, Vice President - Nuclear Engineering & Construction for Houston Lighting & Power Company, who upon his oath stated that the foregoing answers to "Intervenor Doherty's Second and Third Sets, Questions 29 and 8 Respectively Re Quadrex" were prepared under his supervision and direction, and that all statements contained therein are true and correct to the best of his knowledge and belief.

J. H. Goldberg

J. H. Goldberg

SUBSCRIBED AND SWORN TO BEFORE ME by the said
J.H. Goldberg, on this 5th day of April, 1982.



Angelina K. Self

Notary Public, State of Texas
My Commission Expires 2/12/85