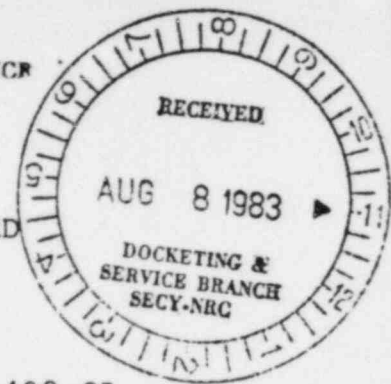


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

STATE OF TEXAS'S MOTION FOR ATOMIC SAFETY
AND LICENSING BOARD TO REQUIRE
NUCLEAR REGULATORY COMMISSION STAFF
TO ANSWER INTERROGATORIES

Pursuant to 10 C.F.R. section 2.720(h)(2)(ii) and section 2.790(e), the State of Texas hereby moves the Atomic Safety and Licensing Board in this proceeding to require the Nuclear Regulatory Commission Staff to answer the interrogatories attached hereto as Exhibits 1 and 2 and to produce the documents requested therein.

The purpose of the Phase II inquiry is to examine both the handling of the Quadrex Report by Houston Lighting & Power Company and the substance of the report itself, and to examine the adequacy of the Staff's position on hurricane design.

The NRC Staff conducted one investigation which led to the release of the Quadrex Report to the NRC Staff and the Board (I&E 81-28), two investigations regarding the handling of the Quadrex Report (I&E 82-02 and I&E 82-12), and various investigations regarding the substance of the Quadrex Report (82-12 being the first such investigation).

Based on these investigations, the NRC Staff reached conclusions about the Quadrex findings regarding notification/

reportability under 10 C.F.R. section 50.55(e), safety significance, generic implications, and adequacy of resolution.

Based on documents reviewed by Texas to date, the positions of various NRC personnel and of NRC personnel and HL&P personnel seem to be at variance regarding the import of the Quadrex findings and the factual context of the Quadrex handling.

As to hurricane design, Texas claims its interrogatories are relevant because they will elicit responses that will aid the Licensing Board in assessing the contention that the plant has not been designed to withstand the highest recorded wind velocities. The Board has recognized that the Staff's position merits full exploration. See Memorandum and Order (Ruling Upon CCANP's Motion to Adopt Contentions of CEU), dated Oct. 15, 1982 at pages 10-14.

Intertwined with the interrogatories are document requests. Pursuant to 10 C.F.R. section 2.744, therefore, Exhibits 1 and 2 are being served upon the Executive Director for Operations, with a cover letter of which a copy is attached hereto as Exhibit 3.

To enable Texas to better prepare for the licensing hearings and assist the Board in the development of the most complete record for a proper decision, it is necessary for Texas to understand the positions taken by the NRC and to examine the available documentation supporting those positions.

For the above and foregoing reasons, Texas urges the Atomic Safety and Licensing Board to grant this motion.

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 Berwick
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ATTORNEY FOR THE
State of Texas

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

CERTIFICATE OF SERVICE



I hereby certify that copies of State of Texas's Motion for Atomic Safety and Licensing Board to Require Nuclear Regulatory Commission Staff to Answer Interrogatories, with Exhibits 1,2, and 3, were served by deposit in the United States Mail, first class postage paid to the following individuals and entities on the 3^d 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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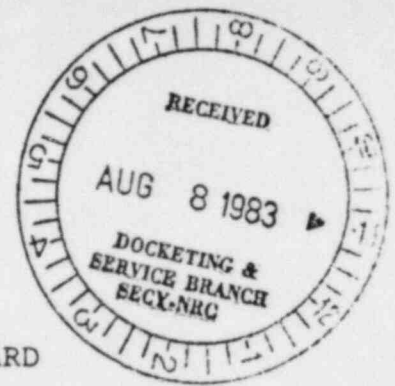
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Lanny Sinkin
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Brian E. Berwick
Brian E. Berwick

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

STATE OF TEXAS'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO THE NUCLEAR REGULATORY COMMISSION STAFF ON QUADREX

These interrogatories are to be answered by NRC personnel with knowledge of the facts inquired about. Such personnel are to be designated by the Executive Director for Operations. Each interrogatory is to be answered separately and fully in writing. Each person participating in answering any question is to sign an affidavit or affirmation as to the truth and correctness of the answers he participated in answering. A copy of the answers is to be served on all parties within 14 days after service of the interrogatories on the NRC.

1. The NRC commenced an audit (or other form of review) of B&R engineering on September 29, 1980, according to HL&P documents. Please identify and provide:

- a. Any reports resulting from this audit.
 - b. Any reponses to the audit by either HL&P or Brown and Root.
 - c. A description of the methodology of this audit.
2. I&E Report 81-37 contains a list of eleven deficiencies

(I&E 81-37 at 7). Please provide:

- a. All Applicant reports to the NRC on such deficiencies.
- b. NRC Staff identification of those seven which were considered design deficiencies.
- c. NRC Staff's position on whether each of the seven deficiencies identified in 2b were "released for construction".
- d. NRC Staff's position as to which of the deficiencies required HL&P to notify the NRC of the deficiency.
- e. For those deficiencies requiring notification to the NRC, the source for that requirement and how that requirement specifically applied to the deficiencies requiring notification.

3. I&E Report 81-37 states that "a special NRC inspection of the design engineering organization was requested on May 27, 1981." (I&E 81-37 at 7-8). Please identify and provide:

- a. Any reports resulting from this inspection.
- b. The response, if any, to this inspection by either HL&P and/or Brown and Root.
- c. The methodology of this inspection.
- d. Any previous or subsequent inspection, evaluations, investigations, or other NRC examination of the design engineering organization of B&R and/or HL&P through August 1981 not contained in I&E reports served on the State of Texas.

4. Please provide any Systematic Assessment of Licensee Performance issued since I&E 81-37.

5. On May 8, 1981, did anyone at the NRC besides Mr. Sells or possibly Mr. Phillips know that the Quadrex review was nearing completion?

6. Please define the term "performance specifications" as used in 10 C.F.R. section 50.55(e)(1)(iv) and provide the source for this definition.

7. Please provide a copy of the guidance on 50.55(e) and other reporting requirements (e.g. significant events) provided to the Applicants on March 11, 1980. (See Staff Exhibit No. 52, I&E Report 80-04 at 10-11)

8. Is it the NRC Staff's position that if HL&P had turned the Quadrex Report over to the NRC Staff on May 8, 1981, the Staff would have in turn provided copies to

- a. the ASLB
- b. the Commission
- c. Please provide an explanation for your answers to 8a and 8b.

9. If design and engineering is not being carried out as required by IEEE,

- a. is such a deficiency a violation of NRC requirements? Please explain your answer.
- b. If the answer to 9a is "Yes," where is this requirement documented?
- c. Is the license holder obligated to notify the NRC of such a deficiency?
- d. If the answer to 9c is "Yes," where is this requirement to notify documented?
- e. Is such a deficiency per se subject to notification within 50.55(e) requirements? Please explain your answer.

10. If design and engineering is not being carried out as required by ANSI N45.2,

a. is such a deficiency a violation of NRC requirements? Please explain your answer.

b. If the answer to 10a is "Yes," where is this requirement documented?

c. Is the license holder obligated to notify the NRC of such deficiency?

d. If the answer to 10c is "Yes," where is this requirement to notify documented?

e. Is such a deficiency per se subject to notification within 50.55(e) requirements? Please explain your answer.

11. Did the NRC receive any reports pursuant to 10 C.F.R. Part 21 based on the Quadrex Report findings? If so please identify and produce all such reports and NRC responses to those reports.

12. Please specify what obligations Applicants had on May 7, 1981 to report information to the NRC. Please provide citations to the rules, regulations, case law, or other sources for these obligations.

13. Please state generally the NRC Staff position on the purpose of 10 C.F.R. section 50.55(e)

14. In the NRC Staff's view, what is the relationship between technical adequacy, as that term is used in the Quadrex Report, and safety? In this answer, please address whether a design found not to be technically adequate could still be assumed safe by the NRC.

15. Please describe exactly how Mr. Herr and Mr. Phillips came to see the Quadrex Report in August 1981.

16. Please identify and provide all records of contact between the NRC and HL&P regarding release of the Quadrex Report to

a. the NRC Staff

b. the ASLB (including Mr. Reis' contacts with Applicants' attorneys)

17. When did Region IV NRC receive a copy of the Quadrex Report? Please detail who received the copy(ies), how they received the copy(ies), and from whom they received the copy(ies).

18. On December 15, 1981, William J. Dircks, Executive Director for Operations, NRC, sent a memorandum to Commissioner Peter A. Bradford on the subject of "Chronology Related to the Quadrex Report on South Texas." Attached to that memorandum is a Chronological List of Events.

- a. Who prepared the chronology?
- b. Please identify and provide all documents supporting the chronology as set forth.
- c. How did Mr. Hale (Staff, Region IV) become aware of the Quadrex Report?
- d. Please identify and provide all records of Mr. Collins' contacts on August 27, 1981 with:
 - (1) Mr. Oprea
 - (2) Mr. DeYoung
 - (3) Mr. Case
- e. Please identify and provide all of Mr. Hale's records of his review of the Quadrex Report from August 31 to September 3, 1981.
- f. Did Mr. Hale take a copy of the Quadrex Report with him when he finished his review?
- g. If the answer to 18f. is "Yes," to whom did Mr. Hale deliver such copy(ies) at Region IV?

h. Please identify and provide all records of Mr. Hale's briefing to Region IV personnel on September 4, 1981, including but not limited to all notes taken by participants in that briefing, all notes prepared for that briefing by Mr. Hale, all memorandums written as a result of that briefing, telephone minutes resulting from such briefing, and similar documentation of the briefing contents and the response by NRC personnel to the briefing.

i. Please identify all Region IV personnel present at the September 4, 1981 briefing.

j. Please provide the basis including all documentary support for the statement that "Quadrex did not appear to identify any significant items not already known to the NRC."

k. Did the Region IV personnel present at the September 4, 1981 briefing receive a copy of the Quadrex Report at that time?

l. Please identify and produce all records of the HL&P overview provided to Region IV on September 8, 1981.

m. Please identify all personnel of HL&P, Region IV, or anyone else present at the September 8, 1981 overview meeting.

n. Did HL&P provide copies of the Quadrex Report to NRC at the September 8, 1981 overview meeting?

o. If the answer to interrogatory 18n. is "Yes," to whom were such copies provided ?

p. For the persons named in answer 18o., please detail what they did regarding the Quadrex Report between September 8 and September 28, 1981. Please identify and provide all records of their activities.

19. Please identify and provide all records of Mr. Sells on his meeting with Mr. Goldberg the week of May 13, 1981 regarding the Quadrex Report.

20. Please identify and provide all records of Mr. Sells' review of the Quadrex Report in September 1981 including the chart Mr. Sells prepared. (See I&E Report 82-02 at 7.)

21. Please identify and provide all records of Mr. Sells' conversation(s) regarding the Quadrex Report with Mr. Phillips or anyone else at NRC between the time Mr. Sells discussed the Report with Mr. Goldberg the week of May 13, 1981 and the time Mr. Phillips saw the Quadrex Report in August 1981.

22. Please identify and provide the investigators' (inspectors) notes from the investigation which produced I&E 81-28 and which also relates to the discovery of the Quadrex Report by the investigator and inspector.

23. Please provide a copy of the February 1982 request from Region IV to HL&P to provide information on their transition program pursuant to 10 C.F.R. section 50.54(f). (See NUREG-0948 at iii.)

24. Why did Mr. Sells believe the ASLB should see the Quadrex Report?

25. Why did Mr. Reis and/or Mr. Gutierrez agree?

26. If Mr. Reis or Mr. Gutierrez did receive a copy of the Quadrex Report prior to its release on September 28, 1981 by the Applicants, please detail how Mr. Reis or Mr. Gutierrez came to receive a copy. Please provide all records of the process by which Mr. Reis or Mr. Gutierrez received a copy.

27. Please specify all requests by HL&P for approval to perform construction at STNP in the period

a. January 1, 1981 to May 8, 1981.

b. May 8, 1981 through the date on which the NRC Region IV office first received a copy of the Quadrex Report. Please provide all records documenting these requests and NRC responses.

c. Please explain the methodology by which NRC arrived at a decision to approve or disapprove such requests.

28. Is it the NRC's position that the Region IV Staff would not have been influenced by the Quadrex Report in making the decisions on requests identified in response to interrogatory 27 had the Quadrex Report been provided to the NRC by HL&P on May 8, 1981?

29. Please summarize for the NRC review of the Quadrex Report to date:

- a. the total NRC hours spent.
- b. approximate cost.
- c. number of NRC personnel involved.

30. Please identify and provide all records which document the NRC response to the Chronology submitted by Mr. Lanny Sinkin to the NRC on the alleged conspiracy by HL&P to withhold the Quadrex Report. Please include records of all meetings held to discuss the chronology and all communications with Region IV regarding the chronology. Please also include any records of Mr. DeYoung, Mr. Stello, Mr. Collins, Mr. James Lieberman, and Mr. Snezak regarding the NRC response to the Chronology submitted by Mr. Sinkin.

31. Please produce the letter from William Dircks dated January 11, 1982 comparing the chronology submitted by Mr. Sinkin with the chronology prepared by the NRC.

32. Please state the date on which the investigation which produced I&E 82-02 began.

33. Please identify and produce all records of Mr. John Collins regarding the initiation and conduct of the NRC investigation to determine whether or not HL&P willfully withheld the Quadrex Report from the NRC.

34. Please provide copies of all correspondence, notes, investigative interviews, or other documents related to the investigation which produced I&E 82-02.

35. Please identify "Dr. Key" (I&E 82-02 at 13).

36. Please produce the NRC letter^{to}/HL&P dated August 11, 1982 referenced in NUREG-0948 at 20.

37. Please identify and produce all notes, memoranda, and other records of the meetings between NRC personnel and HL&P personnel held pursuant to I&E investigation 82-12 as referenced in NUREG-0948 at 5 and otherwise.

38. Please identify and produce all notes, memoranda, and other records of the in-office assessment of Quadrex related documents as referenced in NUREG-0948 at 5 and otherwise.

39. Please specify the process the NRC followed (or continues to follow) in addressing the Quadrex findings which remained open as of the issuance of NUREG-0948 Appendix A.

40. Please provide all records not previously provided in response to the foregoing interrogatories which document the NRC response to the Quadrex Report, excluding the detailed review of the substance of the Quadrex findings as documented in NUREG-0948 but including (though not limited to) all responses of Mr. DeYoung, Mr. Stello, and Mr. Lieberman not previously provided.

41. a. Is it the NRC position that the findings in the Quadrex Report as of May 8, 1981 (i.e. prior to any Bechtel, NRC, or other in depth evaluation) did have potential implications for the balance of STNP's design and construction?

b. What were those potential implications?

42. Please provide copies of all NRC testimony to Congress related to the Quadrex Report, including the testimony of Mr. Dircks and the question and answer portion of such appearance.

43. Please identify each person the NRC Staff intends to call as a witness at the Phase II hearings and state the substance of the testimony of each witness.

44. Please identify and produce each document upon which the NRC relies as support for its position as stated in its response to this first set of interrogatories. (Where regulations, legal precedents, or other published material is the source, citations will be sufficient.)

45. Please provide a copy of NUREG 0302 (the revision applicable on May 7-8, 1981).

46. Please provide a copy of Reg. Guides 1.116, 1.123, 1.28, 1.30, 1.64, 1.74, and 1.88 (the revisions applicable on May 7-8, 1981).

47. Please identify all I&E Reports issued on the South Texas Nuclear Project since the last such report admitted into evidence in this proceeding.

48. Please identify and produce a copy of all other inspection reports on STNP not previously provided in response to these interrogatories issued by the NRC on STNP since the close of the record in Phase I.

49. Please identify and produce all records of Mr. Sells' contacts with Mr. Goldberg regarding the Quadrex study prior to May 7, 1981.

50. Please provide a copy of Wash 1283 and Wash 1309 as of May 7, 1981.

51. Why did the NRC conduct a staff review of the Quadrex Report?

52. Did the Staff review of the Quadrex Report include a determination of whether notification/reporting requirements other than 10 C.F.R. section 50.55(e) had been met?

53. If the answer to interrogatory 52 is "Yes," why were no other determinations made of compliance with notification/reporting requirements?

54. For each of the six items from the Quadrex Report which the Staff says were reported to the NRC by HL&P (See NUREG-0948 at 19-20), please provide:

a. the position of the NRC Staff on whether the NRC should have been notified of that item pursuant to 10 C.F.R. section 50.55(e).

b. the particular clause(s) in §50.55(e) requiring notification for those the NRC Staff asserts required notification.

c. a detailed explanation of why the clause(s) noted in 54b. applied to that finding.

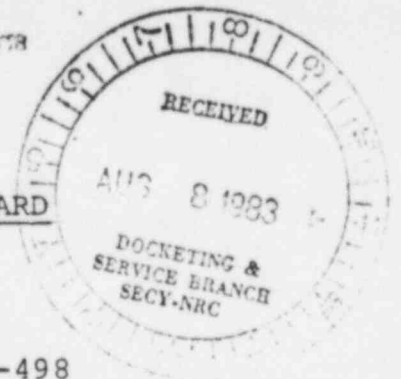
d. whether each finding was a final design released for construction.

55. State the name, position, and full working address (not post office box number), of each person who participated in answering any of these interrogatories, and specify by number and letter which interrogatory and each subsection thereof which each such person participated in answering.

RELATED CORRESPONDENCE

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
COMPANY, ET AL	§	50-499
	§	
(South Texas Project, Units	§	
1 and 2)	§	

STATE OF TEXAS'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR
PRODUCTION TO NRC STAFF ON CONTENTION 4

These interrogatories are to be answered by NRC personnel with knowledge of the facts inquired about. Such personnel are to be designated by the Executive Director for Operations. Each interrogatory is to be answered separately and fully in writing. Each person participating in answering any question is to sign an affidavit or affirmation as to the truth and correctness of the answers he participated in answering. A copy of the answers is to be served on all parties within 14 days after service of the interrogatories on the NRC.

1. Does the NRC contend that there are no recorded hurricanes

a. in the Gulf of Mexico

b. in the North Atlantic Ocean

in which the fastest mile wind speed, 30 feet above ground has been higher than 125 miles per hour?

2. Please define "fastest mile wind speed" as used by the NRC.

3. If the answer to interrogatory 1 is no,

a. please identify hurricanes whose fastest mile wind speed, 30 feet above ground exceeded 125 mph and provide the speed for each hurricane.

b. please explain NRC acceptance of 125 mph as the design wind velocity for the fastest mile wind speed at STNP.

c. please identify all studies or documents relied upon in answering 3a and 3b.

4. If the answer to interrogatory 1 is yes, please provide the NRC's position on the fastest mile wind speed for each of the following:

a. The hurricane on September 27 through October 6, 1949 making landfall near Freeport, Texas.

b. Hurricane Carla (1961)

c. Hurricane Hilda (1964)

d. Hurricane Betsy (1965)

e. Hurricane Celia (1970)

f. Hurricane Allen (1980)

g. Hurricane Anita

5. Please identify all studies or documents relied upon in answering interrogatory 4.

6.a. What is the peak hurricane wind gust value used by Applicants in designing STNP?

b. Where is this value documented in Applicants' filings with the NRC? Please provide a copy of said documentation.

c. Please identify all studies or documents relied upon by the NRC in accepting the Applicants' value.

7. Does the NRC contend that there are no recorded hurricanes

a. in the Gulf of Mexico

b. in the North Atlantic Ocean

in which the peak wind gust has been higher than the value given in response to interrogatory 6a?

8. If the answer to interrogatory 7 is no,

a. please identify the hurricanes whose gusts exceeded the value given in answer to interrogatory 6 and the highest gust for each hurricane identified.

b. please explain NRC acceptance of the value given in answer to interrogatory 6.

c. please identify all studies or documents relied upon in answering 8a and 8b.

9. What is the NRC position on the extent of the "surrounding area" required to be considered by 10 CFR Part 50, Appendix A, Criterion 2? Please explain the basis for the NRC's position.

10. Would the design of STNP differ if the Applicants had selected a fastest mile speed of 185 mph rather than 125 mph? If so, please describe generally how the design would have differed. If not, please explain why the design would not differ.

11. Would the design of STNP differ if the Applicants had selected a peak gust value of 200 mph rather than the value given in response to interrogatory 6? If so, please describe generally how the design would have differed. If not, please explain why the design would not differ.

12. Please identify each witness the NRC intends to call on Contention 4 and summarize the testimony of each.

13. Is it the NRC's position that having designed parts of STNP to withstand missiles carried by tornado winds of 360 mph, these same parts of STNP are therefore designed to withstand a fastest mile wind speed of 360 mph? Please explain.

14.a. What is the heaviest rainfall the NRC has considered in reviewing and approving the design of STNP?

b. Please identify all studies or documents the NRC relied upon in answering interrogatory 14a.

15.a. What is the highest flood crest on the Colorado River the NRC has considered in the design of STNP?

b. Please identify all studies or documents the NRC relied upon in answering interrogatory 15a.

16.a. What is the highest hurricane storm surge the NRC has considered in reviewing and approving the design of STNP?

b. Please identify all studies and documents the NRC relied upon in answering interrogatory 16a.

17. State the name, position, and full working address (not post office box number), of each person who participated in answering any of these interrogatories, and specify by number and letter each interrogatory and each subsection thereof which each such person participated in answering.



The Attorney General of Texas

August 2, 1983

JIM MATTOX
Attorney General

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An Equal Opportunity/
Affirmative Action Employer

Mr. William J. Dircks
Executive Director for Operations
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket Nos. 50-498
50-499

Dear Mr. Dircks:

Pursuant to 10 C.F.R. section 2.744, the State of Texas hereby requests the production of the records and documents described in Exhibits 1 and 2 to this letter. Exhibits 1 and 2 are essentially interrogatories, intertwined with document requests. For your convenience, the next paragraphs specify where the document requests appear. Only the document requests are addressed to you, as section 2.744 seems to require.

The Exhibit 1 interrogatories which request documents are as follows: Numbers 1a., 1b., 2a., 3a., 3d., 4, 7, 11, 16, 18b., 18d., 18e., 18h., 18j., 18l., 19, 20, 21, 22, 23, 27b., 30, 31, 33, 34, 36, 37, 38, 40, 42, 44, 46, 48, and 50.

The Exhibit 2 interrogatories which request documents are as follows: Numbers 5, 6b., 6c., 8c., 14b., 15a., and 16a.

A copy of this letter and its attachments are being sent to the Atomic Safety and Licensing Board and all counsel.

Mr. William J. Dircks
August 2, 1983
Page 2

Thank you for your help in responding to
this request.

Sincerely,

Brian Berwick

Brian Berwick
Assistant Attorney General
Environmental Protection Division

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BB:kh

Enclosures

cc: Atomic Safety and Licensing Board
All counsel