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USNRC

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

'84 OCT -9 A11:52

In the Matter of  
  
HOUSTON LIGHTING AND  
POWER COMPANY, ET AL.  
(South Texas Project,  
Units 1 and 2)

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Docket Nos. 50-498 OL  
50-499 OL

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

CITIZENS CONCERNED ABOUT NUCLEAR POWER (CCANP)  
SPECIFICATION OF PARTICULAR MATTERS FOR CONSIDERATION  
IN PHASE II HEARINGS

On May 22, 1984, the ASLB in this proceeding issued a Memorandum and Order calling upon the parties to identify the list of particular matters suggested for consideration in Phase II hearings in this proceeding.

The ASLB to date has reviewed numerous motions for new contentions and issued various orders relating to such motions. CCANP seeks further clarification from the ASLB on the ASLB's view of the issues which it will permit to be considered in Phase II hearings. Consequently, CCANP herein submits a comprehensive list of the issues it believes the Phase II hearings should encompass and awaits the ASLB's response to such a list.

Quadrex Issues

I. Pre-Quadrex B&R Design and Engineering Process

A. Audits

1. B&R
2. HL&P
3. Trends
4. Failure to take timely corrective action

B. Reports to NRC

1. 50.55(e)
2. Other (e.g. Part 21)

C. Other studies of design and engineering (third party)

D. Guidance to HL&P and B&R QA personnel

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## II. Commissioning of Quadrex

### A. Quadrex/HL&P relationship established

### B. Direction

1. HL&P defining study
  - a. Known problems of industry
  - b. Known problems of B&R

### C. Purpose

1. HL&P view
2. Quadrex view

### D. Quadrex qualifications

1. Previous studies
2. Staff experience

## III. Conduct of Study

### A. Methodology

1. Location
  - a. On site
  - b. Home Office
2. Sampling technique
  - a. Who devised
  - b. How implemented
3. Extensiveness
  - a. Time
  - b. Personnel
  - c. Cost
  - d. Drawings, descriptions, etc. reviewed

### B. Interaction HL&P/Quadrex

1. Interim Meetings
2. Comments on Drafts
3. Revisions during study
  - a. topics
  - b. approach/methodology
  - c. scope

### C. Interaction HL&P/B&R

1. Interim meetings
2. Comments on drafts
3. Revisions of study discussed

### D. Interaction B&R/Quadrex

1. Interim meetings
2. Comments on drafts
3. Revisions of study discussed

### E. Quadrex

1. Changes over time period of study
  - a. Methodology
  - b. Topics
  - c. Opinion or perspective
  - d. Scope
  - e. Categorization

### F. Personnel (not covered by II.D.2 or III.A.3.b.)

### G. Interactions HL&P/NRC

1. Goldberg/Sells
2. HL&P/Region IV

#### IV. Delivery of Study

##### A. Meetings

1. Responses of HL&P
2. Responses of B&R
3. Quadrex responses to HL&P and B&R responses

#### V. Notification/Reportability

##### A. Obligations to Board and Staff

1. B&R
2. HL&P
3. Quadrex
4. Policy guidance issued by
  - a. HL&P
  - b. B&R
  - c. NRC

##### B. 50.55(e)

1. Quadrex Reports by HL&P
  - a. Details, reporting process, substance
  - b. Safety Significance
  - c. Methodology for deciding notification
  - d. Methodology for deciding reportability

#### VI. Substance of Quadrex

- A. Specific Findings
- B. Generic Findings
- C. Implications for HL&P's Character and Competence

#### VII. Post Quadrex/Pre NRC Review (August 1981)

- A. Changes in B&R design and engineering
- B. Changes in HL&P design and engineering
- C. Changes in B&R requested by HL&P
  1. Implemented by B&R
  2. Not implemented by B&R
- D. Construction permissions sought and received from NRC
- E. Other responses

#### VIII. NRC Review of Quadrex

- A. Investigation in August 1981
- B. Region IV
- C. Sells/NRR
  1. Freinvestigation (August 1981)
  2. Postinvestigation
- D. Reis/Gutierrez
- E. Construction permissions sought and received from NRC

#### IX. NRC Investigations

- A. CCANP Chronology
- B. Dircks Chronology
- C. 82-02
- D. NUREG-0948

#### X. NRC Testimony

- A. Dircks to Congress
- B. Any other testimony

XI. Quadrex Allens Creek

- A. Failure to Testify
- B. Board Order reopening
- C. Testimony
  - 1. NRC
  - 2. HL&P

XII. Termination of B&R as A-E

- A. HL&P considerations re changing architect-engineer
  - 1. April meeting Corpus Christi
  - 2. Decision making process
  - 3. Reasons for removal

XIII. Phase I Hearings STNP

- A. Testimony
  - 1. Quadrex coverage
  - 2. Engineering generally
- B. Consultant List
- C. Pleadings on Quadrex to date
  - 1. NRC
  - 2. HL&P

Other Issues

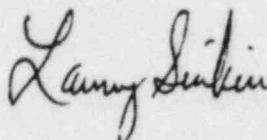
I. Hurricane Contention

II. Bechtel/Ebasco Performance

III. Unstable Soil Conditions (pending)

IV. Reliability of NRC Investigations

Respectfully submitted,



Lanny Sinkin

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October 1, 1984



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NUCLEAR REGULATORY COMMISSION  
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Docket Nos

50-478 DL

50-3478 DL

CERTIFICATE OF SERVICE

I hereby certify that copies of CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. (CCANP) SPECIFICATION OF PARTICULAR MATTERS FOR CONSIDERATION IN PHASE II HEARINGS were served by Express Mail (\*) or by deposit in the U.S. Mail, first class postage paid to the following individuals and entities on the 1st day of October 1984.

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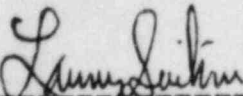
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