

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

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

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CCANP Identification of Witnesses

Citizens Concerned About Nuclear Power hereby identifies the following individuals as the witnesses CCANP intends to call, either by agreement or through subpoena in this proceeding:

1. Mr. Don D. Jordan, Chairman of the Board and Chief Executive Officer of Houston Lighting and Power, to testify regarding his failure to mention the Quadrex Report, or the pendency of a far-reaching review of B&R's design engineering services during his Phase I testimony.

2. Mr. George W. Oprea, Jr., former Executive Vice President - Nuclear of HL&P, to testify regarding communications with the NRC Staff about the Quadrex Report which occurred between August 19, 1981 and September 9, 1981; the HL&P requests for permission to the NRC to carry out safety-related construction during the period May 7, 1981 through December 31, 1981; and his failure to mention the Quadrex Report, or the pendency of a far-reaching review of B&R's design engineering services during his Phase I testimony.

3. Mr. Jerome H. Goldberg, Group Vice President - Nuclear of HL&P, to testify regarding the HL&P requests for permission to the NRC to carry out safety-related construction during the

period May 7, 1981 through December 31, 1981 and his failure to mention the Quadrex Report, or the pendency of a far-reaching review of B&R's design engineering services during his Phase I testimony.

4. Mr. Richard A. Frazar, Manager - Litigation Technical Support for HL&P, to testify regarding his failure to mention the Quadrex Report, or the pendency of a far-reaching review of B&R's design engineering services during his Phase I testimony.

5. Mr. Cloin Robertson, Houston Lighting and Power, to testify regarding his role in the decision making process regarding which items in the Quadrex Report would be notified to the Nuclear Regulatory Commission Staff and whether the Quadrex Report as a whole would be turned over to the ASLB.

6. Mr. M. E. Powell, Houston Lighting and Power, to testify regarding his role and the role of the HL&P Incident Review Committee in the notification to the NRC of 50.55(e) potentially reportable items and in the reporting of significant developments at the project to the ASLB during the period April - June, 1981.

7. Jack R. Newman, Newman & Holtzinger, P.C., to testify regarding his role in the decision not to deliver the Quadrex Report to the NRC Staff and the ASLB prior to September 1981, his role in the ultimate release of the Quadrex Report, his representations to the Board and parties regarding the Quadrex Report, and his role in HL&P's failure to inform the Board of its decision to remove Brown and Root as architect-engineer for STNP.

8. Alvin Gutterman, Newman & Holtzinger, P.C., to testify regarding his knowledge of and responses to the Quadrex Report in the period from January 1, 1981 through September 24, 1981.

9. Maurice Axelrad, Newman & Holtzinger, P.C., to testify regarding his knowledge of and responses to the Quadrex Report in the period from January 1, 1981 through September 24, 1981.

10. Attorneys for Baker and Botts (identities currently unknown) who prepared the prefiled testimony of Messrs. Jordan, Oprea, Goldberg, and Frazar to testify regarding their knowledge and responses to the Quadrex Report, particularly any discussions with said HL&P witnesses or other persons regarding inclusion of information about the Quadrex Report in the prefiled testimony in Phase I, amending said prefiled testimony once the Quadrex Report was delivered to HL&P, and/or including the Quadrex Report in the testimony given during the hearings in Phase I.

11. Mr. Jesse Poston, City Public Service Board of San Antonio, Texas to testify regarding the discussions held by the Management Committee for STNP regarding the Quadrex Report and communication or lack thereof regarding that report to the NRC and parties to this proceeding. Reference: Applicants response to Board ordered discovery, Documents #10, 12, 44.

12. Richard Herr, Investigator, NRC, Region IV to testify regarding the investigation in which he received and reviewed the Quadrex Report.

13. Mr. Joe I Tapia, Reactor Inspector, Region IV, to testify regarding his involvement in the NRC investigation which led to the revelation of the entire Quadrex Report to the NRC.

14. Mr. H. Shannon Phillips, Senior Resident Inspector/Construction, Region IV, to testify regarding his participation in the NRC investigation in which he reviewed the Quadrex Report.

15. Donald E. Sells, Senior Project Manager, St. Lucie Plant, ORB III, Division of Licensing, NRR, to testify regarding his discussion about the Quadrex Report with HL&P managers and other members of the NRC Staff from the time he first heard about the Quadrex Report being commissioned through December 1981.

16. Mr. Ed Reis, OELD, NRC, to testify regarding his communications with Mr. Don Sells and with Houston Lighting and Power or HL&P's counsel about turning the Quadrex Report over to the ASLB.

17. Mr. John Collins, NRC, regarding his meetings with HL&P to discuss the Quadrex Report after the Report was reviewed by NRC investigators in August 1981, including his discussions regarding potential 50.55(e) reports and his tentative conclusion that the entire report represented an "engineering control breakdown" for which a 50.55(e) report should have been made as a violation of 10 C.F.R. Part 50, Appendix B, Criterion VII (Reference: Applicants' supplementary response to ASLB ordered discovery, Excerpt of Minutes of September 12, 1981 Meeting of STP Participants) and his meeting with HL&P personnel on October 6, 1981 at which time the Quadrex Report and the termination of Brown and Root as architect-engineer were discussed. Also to testify regarding his supervision of the investigation into the allegation that HL&P conspired to prevent the NRC from seeing the entire Quadrex Report.

18. Mr. Karl Seyfrit, NRC, regarding his communications with HL&P in the period from May 7, 1981 through December 31, 1981 about requests from HL&P to proceed with safety related construction at STNP and his tentative conclusion that the entire report

represented an "engineering control breakdown" for which a 50.55(e) report should have been made as a violation of 10 C.F.R. Part 50, Appendix B, Criterion VII (Reference: Applicants' supplementary response to ASLB ordered discovery, Excerpt of Minutes of September 12, 1981 Meeting of STP Participants).

19. Mr. Jay Gutierrez, OELD, to testify regarding his participation in the investigation into the allegation of a conspiracy to withhold the Quadrex Report from the NRC.

20. Mr. G. L. Madsen, Reactor Inspector, Region IV, to testify regarding his participation in the investigation into the allegation of a conspiracy to withhold the Quadrex Report from the NRC.

21. Mr. Don Driskill, Reactor Inspector, NRC, to testify regarding his participation in the investigation into the allegation of a conspiracy to withhold the Quadrex Report from the NRC.

22. William J. Dircks, Executive Director for Operations, NRC, to testify regarding his role in the NRC's initial inquiry into HL&P's handling of the Quadrex report, his evaluation of CCANP's charges of a conspiracy to withhold the Quadrex Report from the NRC, and his subsequent testimony to Congress regarding the significance of the Quadrex Report as demonstrating the magnitude of potential quality assurance problems at STNP.

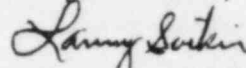
23. Mr. Richard DeYoung, NRC, regarding his role in the NRC headquarters inquiry into HL&P's handling of the Quadrex Report and his findings.

24. Mr. James Lieberman, NRC, regarding the NRC enforcement policies as they apply to the fact of HL&P's handling of the

Quadrex Report and regarding his response to communications from CCANP at the time of the discovery of the Quadrex Report concerning the potential for such enforcement actions.

25. Commissioner Thomas M. Roberts, Nuclear Regulatory Commission, to testify regarding representations made to him on February 21, 1982 by Mr. Jerome Goldberg concerning the nature of the Quadrex Report and the reasons for its commissioning, representations which CCANP contends were false and misleading and represented further evidence of HL&P's intent to deceive the NRC regarding the report.

Respectfully submitted,


Lanny Sinkin

Representative for Intervenor
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Dated: June 13, 1985
Washington, D.C.

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NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

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CERTIFICATE OF SERVICE

I hereby certify that copies of CCANP'S IDENTIFICATION OF WITNESSES and CCANP'S LETTER TO MEMBERS OF THE BOARD DATED JUNE 13, 1985 were served by hand delivery (*) or deposit in the U.S. Mail, first class postage paid to the following individuals and entities on the 13th day of June 1985.

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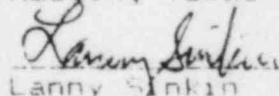
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