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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

APPLICANTS' EIGHTH SET OF  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO CCANP

Pursuant to the Licensing Board's November 18, 1985 Order, and Sections 2.740b and 2.741 of the Nuclear Regulatory Commission's Rules of Practice, Applicants propound the following Interrogatories and Requests for Production of Documents to Citizens Concerned About Nuclear Power, Inc. (CCANP). Applicants incorporate herein the instructions and definitions set forth in their First Set of Interrogatories and Requests for Production of Documents.

Interrogatories and Requests  
for Production of Documents

(1) The Final Safety Analysis Report (FSAR) for the South Texas Project (STP), as amended through Amendment 52 (November 15, 1985) and HL&P's letters to the NRC Staff through January 10, 1986, describe how HL&P's QA program for operation of the STP will meet the requirements of

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10 CFR Part 50, Appendix B. Does CCANP contend that such QA program will not fully satisfy the requirements of 10 CFR Part 50, Appendix B, and that revisions or additions to such QA program are necessary in order to satisfy the requirements of 10 CFR Part 50, Appendix B?

(2) If the answer to Interrogatory (1) is yes, identify and describe each revision or addition to the QA program for operation at STP that CCANP claims is necessary to satisfy the requirements of 10 CFR Part 50, Appendix B.

(3)(a) With respect to each revision or addition identified in CCANP's answer to Interrogatory (2), describe the bases for CCANP's claim that such revision or addition is necessary to satisfy the requirements of 10 CFR Part 50, Appendix B.

(b) In addition, in each instance:

(i) identify, with page references, all documents which provide support for CCANP's claims;  
and

(ii) identify the specific provisions of 10 CFR Part 50, Appendix B, that CCANP claims require such revision or addition and explain how such specific provisions require the particular revision or addition identified by CCANP.

(4) In addition to the information provided in CCANP's answers to Interrogatories (2) and (3), are there any other facts or reasons which CCANP contends supports a claim

that HL&P's QA program for operation of the STP will not meet the requirements of 10 CFR Part 50, Appendix B?

(5) If the answer to Interrogatory (4) is yes, describe each fact or reason which CCANP contends supports the claim that HL&P's QA program for operation of the STP will not meet the requirements of 10 CFR Part 50, Appendix B, and, for each such fact or reason:

(a) describe the bases for CCANP's contention that the fact or reason supports such claim, and

(b) identify, with page references, all documents which provide support for CCANP's contention.

(6) Produce all documents described, referred to, or relied upon in CCANP's answers to Interrogatories (1) - (5).

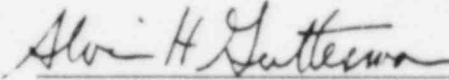
(7) Identify each expert witness whom CCANP intends to have testify on its behalf with respect to Issue F (as accepted for consideration by the Licensing Board in its Second Prehearing Conference Order (December 2, 1980)), and state the substance of the testimony of such witness.

(8) Identify each person not identified in response to Interrogatory (7) whom CCANP intends to have testify on its behalf with respect to Issue F, and state the substance of the testimony of such witness.

(9) Separately for each answer or portion of an answer to the foregoing interrogatories, identify each person

who prepared or assisted in the preparation of such answer and describe the nature and extent of such assistance.

Respectfully submitted,



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Dated: January 29, 1986

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itself and the other Applicants,  
THE 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

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COMPANY, <u>ET AL.</u>	)	50-499 OL
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(South Texas Project, Units 1	)	
and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Eighth Set Of Interrogatories And Requests For Production Of Documents To CCANP" have been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid, or by arranging for delivery as indicated by asterisk, on this 29th day of January, 1986.

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Alvin H. Guttenman

\* By Messenger