

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))	

Affidavit of Joseph W. Briskin

1. My name is Joseph W. Briskin. I am employed by Management Analysis Company, a consulting firm based in San Diego, California. My position is Manager, Program Management Consulting and my duties generally involve consulting on project management and project control issues.

2. I was employed by Houston Lighting & Power Company (HL&P) from March 1980 to August 1982. During that time I held the position of South Texas Project Manager, Houston Operations. My background and professional experience are described in my testimony in this proceeding at Oprea et al., ff. Tr. 1505, at 52.

3. Within about two months after joining HL&P, I was assigned as leader of a task group to supervise HL&P's preparation of a response to the NRC's Show Cause Order of April, 1980, which

stemmed from NRC's "79-19" investigation. I worked essentially full time on that effort from May to about September 1980, and thereafter on a reduced basis until mid-1981.

4. I have reviewed the extracts from my deposition in the litigation between the South Texas Project owners and Brown & Root which were attached to CCANP's motion dated February 21, 1986.

5. In my deposition, I mentioned a dinner meeting at Bay City, Texas, in the summer of 1981 that I attended along with Messrs. Goldberg, Oprea, Barker and Williams. I testified that Mr. Goldberg expressed concern about Brown & Root Engineering's ability to complete the Project and support construction, and the possibility that Brown & Root might have to be replaced as the architect-engineer. As part of this discussion Mr. Goldberg expressed concern about the quality of Brown & Root's engineering and whether the plant would be licensed if Brown & Root continued the engineering. However, the discussion that evening was in the context of whether Brown & Root could complete the engineering work so as to complete the Project and get it licensed in a timely manner.

6. In response to questions about my understanding of the bases for Mr. Goldberg's views, I recalled that the basis may have been Mr. Robertson's viewpoint. Although I speculated that the Quadrex Report was probably a part of the basis for these views, the Quadrex Report was not mentioned during the dinner meeting in 1981, and I do not know the considerations

that led either Mr. Goldberg or Mr. Robertson to express such concerns. Although I mentioned "quality" of engineering in discussing Mr. Goldberg's concern about Brown & Root's ability to complete the Project and get it licensed, I did not have in mind quality assurance, that is, satisfying the requirements of 10 CFR Part 50, Appendix B. Instead I was referring to the concern that required engineering analyses had not yet been performed and engineering problems had not yet been solved so as to assure that the Project could be completed smoothly.

7. As my deposition indicates, I was not directly involved in the planning or conduct of the Quadrex review and was not aware, in any detail, about how the Quadrex review was commissioned, its scope or the manner in which it was conducted, and I had very little discussion on any aspect of the Quadrex Report with Mr. Goldberg.

8. I stated in my deposition that I understood that Mr. Goldberg had the Quadrex review performed to provide technical information he could use if asked for an opinion on the Project design by the Licensing Board. This understanding was based on a remark by Mr. Goldberg around the end of 1980 in the context of a discussion of the forthcoming hearings. I do not recall asking Mr. Goldberg about any other motivation for undertaking the Quadrex review, but it was my general understanding, perhaps from conversations with others on the Project, that the primary purpose of the Report was project-related, that is, to assess the adequacy of B&R's engineering and its status. This was of greater importance than just helping Mr. Goldberg to answer questions if asked.

9. I commented in the deposition that I always supposed the Quadrex Report would be submitted as backup for Mr. Goldberg's testimony. However, there never was any plan to file the Quadrex Report with the NRC or to use it as an exhibit in the licensing hearing. The report was "backup" in the sense that Mr. Goldberg would know about that information and could rely on it to answer any questions he was asked. To the extent the word "submitted" conveyed the idea that I expected the Quadrex Report to be given to the Licensing Board or the NRC, I misspoke. I only meant that the Report would be available for backup in the event Mr. Goldberg was asked questions about engineering during the hearing.

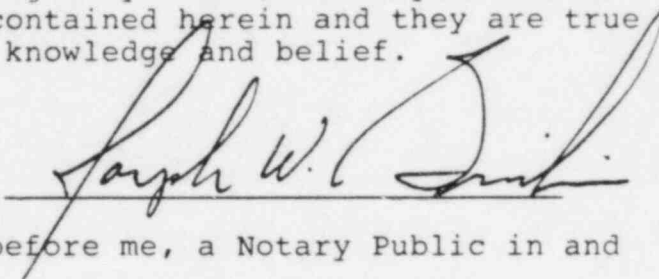
10. At no time, either during the conversation in Bay City mentioned in paragraph 5 or at any other time, did Mr. Goldberg, Mr. Oprea, Mr. Robertson or anyone else suggest to me that, other than those items reported to NRC, the Quadrex Report identified significant safety-related deficiencies in the design that had been released for construction or any significant flaws in the design Quality Assurance program of Brown & Root Engineering.

11. As an outgrowth of my work on the response to the Show Cause Order, I was involved in the preparation of evidence for the Phase I hearing, and was familiar with the plans to present evidence through the consultants who reviewed the Show Cause Order items. Neither in the course of that work nor at any other time was I aware of any discussion of conducting the Quadrex review to develop information relating to the issues to be heard

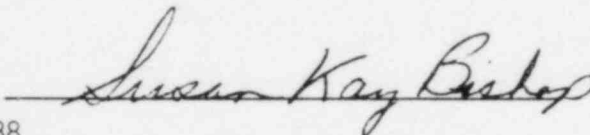
by the Board or of any consideration of submitting the Quadrex Report to the Board.

State of California)
) ss.
County of San Diego)

I, Joseph W. Briskin, being duly sworn, certify that I am familiar with the statements contained herein and they are true and correct to the best of my knowledge and belief.



Subscribed and sworn to before me, a Notary Public in and for San Diego County, California, this 13th day of March, 1986.



My Commission Expires: 04/18/88



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USNRC

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(South Texas Project, Units 1)
and 2))

OFFICE OF SECRETARY
DOCKET Nos. 50-498 OL
BRANCH 50-499 OL

CERTIFICATE OF SERVICE

I hereby certify that a copy of "Applicants' Response to 'Citizens Concerned About Nuclear Power, Inc. (CCANP) Motion to Reopen the Phase II Record: V and for Board Ordered Production of Documents by Applicants'" dated March 14, 1986, has been served on the following individuals and entities by hand delivery as indicated by asterisk or by deposit in the United States mail, first class, postage prepaid on this 14th day of March, 1986.

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