

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'85 DEC 19 P2:38

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

Docket Nos. 50-498 OL  
50-499 OL

OFFICE OF SECRETARY  
OF ENERGY  
NRC SERVICE  
BRANCH

AFFIDAVIT OF LOREN STANLEY

LOREN STANLEY, being duly sworn, deposes and says:

My business address is Zytor Incorporated, Suite 203A, 1213 Lincoln Avenue, San Jose, California, 95125. I testified in this proceeding on July 29 and 30, 1985.

I have reviewed the attached single page of handwritten notes, a copy of which was provided to the Licensing Board and parties by Applicants' counsel on November 29, 1985. These notes were made by me during a telephone conversation I had with Dr. James R. Sumpter of Houston Lighting & Power Company (HL&P), with some minor additions I made later. The conversation occurred on January 2, 1981. In the conversation, we discussed the desire of HL&P to have a review conducted of Brown & Root engineering on the South Texas Project, the scope of the proposed review and its schedule. It is apparent from my notes that Dr. Sumpter gave me some background information about the project, such as the fact that Mr. Goldberg had recently come to HL&P from Stone & Webster.

My attention has been directed to the notation "May 81 Hearing - NRC." I have no specific recollection of any mention of the

NRC hearing during my conversation with Dr. Sumpter. It is possible that Dr. Sumpter mentioned the hearing as part of the general background discussion, or in the context of discussing the schedule for the review. However, neither at that time nor at any other time was it ever suggested to me that the review was being undertaken in any way for purposes of preparation for the hearing.

I was present at the STP hearing on July 11 and 12, 1985, when Mr. Goldberg testified about the purposes of the Quadrex engineering review. His testimony was consistent with my recollection of the purpose, as I understood it in 1981. I knew that Mr. Goldberg had recently assumed responsibility for the design and construction of STP and I understood that he wanted to get an independent review of the status of the engineering effort and B&R's ability to perform the remaining design work. At one point during that time, Dr. Sumpter mentioned to me that the review might assist HL&P in answering any questions about engineering that might arise at the NRC hearing. That comment may have been made during the January 2nd telephone conversation, or at some other point. In any event, I understood that the added ability to answer such questions was a relatively minor incidental benefit the review might provide, and was not a motivation for conducting the review.

I have been asked whether, during our January 2, 1981, telephone conversation, Dr. Sumpter said the people performing the study should be "fairly heavy people" because they might be called to testify in the May 1981 hearing. Dr. Sumpter did not make any such statement. Dr. Sumpter never suggested to me, either in that telephone conversation or at any other time during the

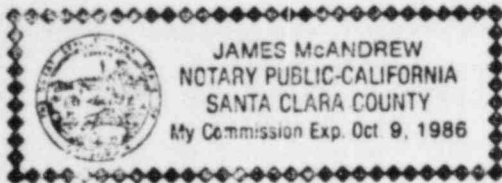
review, that Quadrex personnel might be asked to testify in the NRC hearing. My reference to "fairly heavy people" was simply my own shorthand for noting Dr. Sumpter's request that we employ experienced personnel in the review.

The attached page of notes was copied with an index card stapled to it. It was not unusual for cards to be stapled to papers in my files at Quadrex. I do not recall what is written under the card, however, I am certain that I did not intentionally cover something of potential interest when I sent this copy of my notes to Dr. Sumpter in 1982.

Loren Stanley 12/12/85  
Loren Stanley

State of California       §  
                                  §  
County of Santa Clara   §

Subscribed and sworn to before me, a Notary Public in and for Santa Clara County, California, this 12 day of December 1985.



James McAndrew  
Notary Public in and for the  
State of California

My Commission Expires: 10-9-86

9/8 455 9351

1A

Jim Sumpter

Jerry Goldberg new VP from STW

2<sup>-3</sup> week <sup>eng</sup> audit of Brown + Root (STP)

Signif ELEC: SFC, seg, class, diesel loading

TYPE <sup>HSS</sup> CIVIL: Seismic tornado interaction

Murphy - MECH: ASME, stress allow code bounding conditions

Wilkey <sup>EDS sub/cont.</sup> pipe break boundaries

Yao - Nucl: transient analysis - St. Brink etc. H<sub>2</sub> gen in bulk rooms, pipe break  
blowdown

Herb Booth  
Randy Sutton

Radiological Control

Geotechnic

HVAC

Row Ehat  
Mitt Frankel

must be indep. of HCLP/BTR

Geotechnic

(Driver + House)

Jay Smith  
Paul Smith  
213 595 5795

TSP - separate HCLP  
findings

2/1 start work  
2/15 7 areas done sequentially 10-12 days.

2nd week of January

Jan 12-16

Family heavy people

May 81 hearing - NRC

Sumpter  
[713] 486-3778  
713) 481-7381 - Tel. copy  
7383 verp.

Alfred B. B. (713) 481-7745 (m)  
713) 481-7383

Bob Bosnick  
or Bob Kirkwood  
481-7745  
98

J. J. Pachos

867-0202

395-7722

K SHWIN

NO HCLP TIME ON THE SHEETS IN DECEMBER  
BASED ON MY 1-15-81 TIMESHEET  
THIS CALL MUST HAVE TAKEN PLACE ON FEBRUARY 1-2-81  
OR 1-1-81

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRIAN BERWICK

CERTIFICATE OF SERVICE

I hereby certify that copies of the letter to the Atomic Safety and Licensing Board from A. H. Gutterman dated December 17, 1985 with attached "Affidavit of Loren Stanley" have been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid on this 17th day of December, 1985.

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Atomic Safety and Licensing  
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U.S. Nuclear Regulatory  
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Washington, D.C. 20555

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Chapel Hill, NC 27514

Frederick J. Shon  
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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Alvin H. Gutten