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202-955-6600

December 20, 1985 '85 DEC 23 P2:30

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Administrative Judge
313 Woodhaven Road
Chapel Hill, NC 27514

Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Houston Lighting & Power Co., et al.
South Texas Project, Units 1 & 2
Docket Nos. 50-498 OL, 50-499 OL

Dear Members of the Board:

As promised in my letter dated November 27, 1985, enclosed is a table which cross-references the Phase II proposed findings of the parties, including the proposed findings for the reopened proceeding which were submitted on December 13.

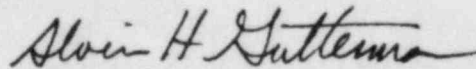
Applicants have attempted to accurately reflect the substantive areas covered by the parties' findings, although we found that the selection and description of the subjects required some subjective judgment. Since there is some overlap among the subjects, specific portions of the proposed findings may be cited under more than one subject.

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PDR ADOCK 05000478
G PDR

Charles Bechhoeffer, Esq.
Dr. James C. Lamb, III
Frederick J. Shon
December 20, 1985
Page Two

Also enclosed are amended and corrected Appendices A and B to Applicants' Phase II proposed findings. Appendix A, as amended, identifies the witnesses who testified on December 5 and 6 as well as those who testified during July and August. Appendix B lists the exhibits, including those from December 5 and 6, from Phase II. Several corrections have been made to Appendix B to correct typographical errors and the identification of evidentiary status (i.e., not offered, rejected, etc.).

Respectfully Submitted,



Alvin H. Guttelman
Attorney for Applicants

cc: Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that a copy of the letter from Alvin H. Gutterman to the Board dated December 20, 1985, with attachments, has been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid, on this 19th day of April, 1985.

Charles Bechhoefer, Esq.
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Atomic Safety and Licensing Appeal Board
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Washington, D.C. 20555

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

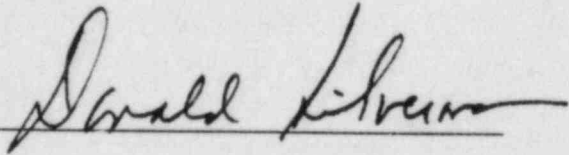

Donald Liberman

Table of Cross References^{*/} Between Phase II
Proposed Findings of Fact Submitted by the Parties^{**/}

SUBJECT	CCANP FOF	APPLICANTS' FOF ^{***/}	NRC STAFF FOF
A. PHASE II			
1. General Introduction and Background	I.1-18	I.1-6, VI.1-20, RI.1-4	I.A.1-25
° Sufficiency of Parties' Proposed Findings	---	RI.2-3	---
° Bases for Determinations on CCANP Subpoena and Sequestration Requests	---	VI.18-19	---
2. Introduction to Quadrex and Contention 9 Generally	I.1-2, III.1-13	II.1-2, VII.2-6	I.A.9-17, I.B.1-5
3. Interpretation of Section 50.55(e) Generally	II.3-7	II.3-9, RII.46-47	I.E.11, 13, 15-16
4. Actions Relating to Quadrex Review Prior to May 6, 1981	II.8-15, III.14-24	II.10, 19, VII.1-18, 58-59, VIII.70-77, RII.1-16	I.B.1, 6, 7-12, 32 I.E.14-15
° Goldberg contacts with D. Sells	II.8, III.15-16	II.19, VII.2, 14, RII.15	I.B.1, 11, 32, I.E.14-15
° ALARA	II.9, III.17	VIII.70-77, RII.6-7	---

^{*/} All references are to paragraph numbers.

^{**/} Cross references to the Proposed Findings submitted by the parties on December 13, 1985 (reopened Phase II proceeding) begin with item 27.

^{***/} Applicants' Proposed Findings include Applicants' Reply Findings which are numbered beginning with "R".

SUBJECT	CCANP FOF	APPLICANTS' FOF	NRC STAFF FOF
° March 18, 1981 Briefing	II.10-12, III.18	VII.7, RII.9-10	I.B.6
° April 13, 1981 Briefing	II.13, III.19-20	VII.9-12, RII.11-13	I.B.7-10
° April 27, 1981 Management Committee Meeting Notes	---	VII.15	---
° Information Available as of April 30, 1981	II.14, III.21-22	II.10, VII.16-18, RII.14	I.B.12
° March, 1981 Reportability Review of ASME Error	II.15, III.23-24	VII.8, RII.8	---
° Conclusions Regarding Events Prior to May 6, 1981	---	RII.16	---
5. Reportability Review Process During May 6-8, 1981	II.22-23, 59, III.100-150, 155	II.11-15, 18, 21, VII.1, 19-38, 47-48, 58-59, RII.1-3, 17-37, RVI.1-2	I.B.13-24, 31
° B&R Involvement	II.22-23, III.113A, 125, 130, 147-149	II.11, VII.23-24, RII.28-30	I.B.13, 17
° Review of the Most Serious Discipline Findings	II.22-23, III.106, 109, 119-121, 146	II.12-13, VII.20, 30-38, RII.31-32	I.B.14-15, 17, 21-24
° 24 Hour Review Period	II.22, III.105, 108	RII.34	---

SUBJECT	CCANP FOF	APPLICANTS' FOF	NRC STAFF FOF
° Relative Experience and Knowledge of Review Team and IRC	III.127-129, 137-140	II.11, 14, VII.25-29, RII.19-21, 27	I.B.18-20
° Departure from IRC Procedure	II.22-23, III.134-137, 141	II.14, VII.25-27, RII.19, 27	I.B.18-19
° Absence of QA Representative	II.22, III.136, 145	RII.19, 23	---
° Involvement of HL&P Engineering Staff	II.22, III.124, 135	RII.19, 22	---
° Involvement of Loren Stanley	II.22, III.122	RII.26	---
° Documentation of Non-Reportable Items	III.135	VII.48, RII.19, 26	I.B.31
° Alleged Undue Influence by J. Goldberg	II.22, III.115-117, 142-144	RII.36	---
° Absence of References to Quadrex in Oral Report to Region IV	II.22, III.144	II.18, VII.47, RII.19, 24-25	---
° Conclusions Regarding May 6-8, 1981 Reportability Review Process	---	RII.37	---
6. Handling of Quadrex Report After May 8, 1981	II.24, 60, III.91-93, 95-97, 151-154, 178, 196	II.18-21, VII.1, 43, 47, 49-51, 53-59, RII.1-3, 19, 37-45	I.B.33-38, 41

SUBJECT	CCANP FOF	APPLICANTS' FOF	NRC STAFF FOF
° May 1981 Goldberg - Sells Meeting	II.60, III.91-92	II.19, VII.49-51, RII.40-41	I.B.33-35
° Absence of References to Quadrex in Written Section 50.55(e) Reports and IRC Minutes	II.24, III.153	II.18, VII.47, RII.39	---
° Robertson-Sumpter Review of Quadrex Report	III.152	VII.43, RII.37	---
° Stop Work Order on Access Engineering	III.154	RII.19	---
° Staff Receipt of Quadrex Report During August, 1981 Investigation	III.93, 196	II.20, VII.55	I.B.36
° September, 1981 Discussions with and Briefing of Region IV Officials	III.95-97	II.20, VII.56, IX.15	I.B.37-38, IF.8-10
° Alleged Confidentiality of Quadrex Report	III.178, 196	VII.53-55, 58, RII.42-45	I.B.32-41
7. Alleged Collusion of NRC Staff	III.91-99, 156	VII.57, RII.2, 38, 41, 70	I.B.34, 39-40 I.F.10
° Don Sells	III.91-92, 156	RII.2, 38, 41	I.B.34
° John Collins	III.93-97	RII.2, 38, 41, 70	I.B.40, I.F.10
8. William Dircks' Congressional Testimony	III.98-99	VII.57, RII.70	I.B.39

SUBJECT	CCANP FOF	APPLICANTS' FOF	NRC STAFF FOF
9. Reportability of HVAC	II.16-17, III.25-27, 31-32	II.15, VII.35, 39, 46, RII.75	I.B.25
10. Reportability of Computer Codes	II.16-17, III.25-26, 28, 31-32	II.15, VII.35, 40, 46, RII.75	I.B.26
11. Reportability of Shielding	II.16-17, III.25-26 29-31	II.15, VII.35, 41-42, RII.67, 75	I.B.27
12. Reportability of Generic Findings	II.18-19, III.33-55	II.16-17, 22-25, VII.44, VIII.1-6, 78-158, 166-177, RII.48-55, 76, 78	I.D.1-85
13. Reportability of Discipline Findings	II.20, III.33-34, 56-72	II.16-17, 22-24, 26-27, VII.44, VIII.1-77, 166-177, RII.46-47, 56-67, 76-78	I.C.1-80
14. Reportability of Whole Report	II.21, III.33-34, 73-90	II.22-24, 28, VII.44, VIII.1-6, 159-177, RII.46-47, 68-76, 78	I.E.1-22
15. Other Reportability Reviews	III.208-211	VIII.166-174, RII.76-78	I.B.28-30
16. Corrective Actions Taken in Response to the Quadrex Findings	---	VII.45	---

SUBJECT	CCANP FOF	APPLICANTS' FOF	NRC STAFF FOF
17. Conclusions on Contention 9	II.25-56	II.30-37, RVI.1-3	I.B.41, I.E.22
° Relationship of Section 50.55(e) Issues to HL&P's Character	---	II.32-35	---
18. Contention 10 - Informing the Board of the Quadrex Report	II.27-28, III.159	III.1-9, IX.1-16, RIII.1-3, RVI.1-5	I.F.1-12
19. Contention 10 - Informing the Board Regarding B&R Termination	II.29, III.160-165, 182, 192, 206	III.1-2, 10-15, IX.17-34, RIII.4-8, RVI.1, 5.	I.G.1-9
° Involvement of Counsel	III.182, 192, 206	IX.32-33, RIII.7-8	I.G.9
20. Candor of Phase I Testimony	II.30-40, III.166-173	III.1, 10-13, 16-20, IX.17-34, 35-48, RIV.1-7	---
° Don Jordan	II.33-35, 40, III.167-71	IX.36-38, 48, RIV.3-5	
° George Oprea	II.38-39, III.173	IX.39-41, 48, RIV.7	
° Jerome Goldberg	II.36-37, 39, III.172	IX.42-44, 48, RIV.6	
° Richard Frazar	---	IX.45-48	
21. HL&P's Phase II Testimony	II.41-42, III.20, 110, 114, 174-207	RI.1, 4, RII.8, 12, 13, 15, 19, 21, 25, 27, 33, 35, 42-44, 72-73, RIII.7-8	I.B.7-10, 14, 16-18, 32-41, I.G.9

SUBJECT	CCANP FOF	APPLICANTS' FOF	NRC STAFF FOF
° Don Jordan	III.177, 191-193	RIII.7	---
° Jerome Goldberg	III.20, 110, 114, 178-182, 194-206	RI.1, RII.12, 13, 15, 19, 25, 27, 33, 35, 42-44, 72-73, RIII.8	I.B.7-10, 14, 16-18, 32-41, I.G.9
- Account of April 13, 1981 Briefing	III.20, 202	RII.12, 13	I.B.7-10
- Level of IRC Activity in Early 1981	III.204	RII.19	---
- Alleged Confidentiality of Quadrex Report	III.178, 196, 203	RII.25, 42-44	I.B.32-41
- Details of Various Meetings on May 7-8, 1981	III.110, 114, 197- 198, 200, 201	RII.27, 35	I.B.14, 16-18
- Awareness of Quadrex's Use of Generic Findings	III.194	RII.33	---
- Purposes of Quadrex Review	III.179, 205	RI.1, ^{*/} RII.72	--- ^{*/}
- Uniqueness of Quadrex Review	III.180, 195	RII.15	---
- Previously Identified Design Deficiencies	III.181	RII.73	---
- Involvement of Counsel in Selection of B&R Replacement	III.182, 206	RIII.8	I.G.9
° James Sumpter	III.183-190	RII.8, 21	---
22. Conclusions on HL&P's Character	II.43-69, II.84- 87, III.157-158	RVI.1-5	I.B.41, I.E.22, I.F.12, I.G.8-9

^{*/} For Applicants' and the NRC Staff's responses to CCANP FOF ¶ III.205 (relationship of Quadrex review to Phase I hearing preparation), see items 27-35, infra.

SUBJECT	CCANP FOF	APPLICANTS' FOF	NRC STAFF FOF
23. Competence of HL&P	II.70-82, 86, 88-95, III.212-218	II.38-39, IV.1-18 VIII.4, X.1-46, RII.17, 76, RIII. 5-6, RV.1-2	I.H.-J
° As Reflected by the Quadrex Review Process	II.70-78, 88	II.39, RII.17	---
° Don Jordan's Competence	II.79, 82, 86, 88-89, 91-93	RIII.5-6	---
° Current Section 50.55(e) Competence of HL&P	II.80, 90, III.213-216	II.38, IV.1-7, X.1-18, RV.1-2	I.H.1-16
- Current Section 50.55(e) Reporting Program	---	II.38, IV.1-7, X.1-18	I.H.1-16
- Jerome Goldberg's Section 50.55(e) Competence	II.80, 90, III.213-16	RV.1-2	I.H.15
° Competence of Bechtel Witnesses	II.81, 94-95, III.217-218	VIII.4, RII.76	I.C.3-4
° Issue B/D-1, Adequacy of Backfill	---	IV.8-14, X.19-36	I.I.1-20
° NRC Staff Updated Views on HL&P's Competence	---	IV.15-17, X.37-46	I.J.1-10
° Conclusions Regarding Current Competence of HL&P and its Contractors	---	IV.18	I.J.11

SUBJECT	CCANP FOF	APPLICANTS' FOF	NRC STAFF FOF
24. Responsibility of the Partners	II.83, 88, III.219	---	---
25. Motion to Reopen Re SLI, Inc. Report	IV.1	---	---
26. Conclusions of Law	V.1-2	V.1-14, XI.1-3, RVII	II.1-6
B. REOPENED PROCEEDING			
27. General Introduction and Background to Reopened Proceeding	I.1-4	I.1-4	A.1-B.2
28. Purpose of Quadrex ^{*/} Review Generally- Relationship to Phase I Hearing Preparation	II.10-12, 14, 15, 25-26	II.5-10	C.4, 6, D.1-12, E.1-3
29. STP Management Committee Notes Generally	II.1-5, 15	III.11, 22-23	C.1-8
30. December 4, 1980 Management Committee Meeting Notes	II.6-15	III.12-16	E.4-6
31. February 19, 1981 Management Committee Meeting Notes	II.16-21	III.17-19	D.9, E.5-6

^{*/} For related findings see items 2 and 21 ("Purposes of Quadrex Review"), supra.

SUBJECT	CCANP FOF	APPLICANTS' FOF	NRC STAFF FOF
32. February 20, 1981 Management Committee Meeting Notes	II.22-24	III.20-21	E.5, E.7
33. LBP-85-45 Scenario	---	IV.24-29	D.9
34. Phase I Abdication of Responsibility Issue	---	V.26, 28, 31	D.5, 10-11
35. Conclusions on Reopened Proceeding Issues	II.27-28, III.1	V.30-31	F.1, II.

Appendix A

List of Phase II Witnesses and Prefiled Testimony

<u>Witness</u>	<u>Prefiled Testimony Cited as</u>
David G. Barker	(no prefiled testimony)
Sidney A. Bernsen	Bernsen/Lopez, ff. Tr. 13441
Danny R. Carpenter	Carpenter, ff. Tr. 15114
John T. Collins	(no prefiled testimony)
George L. Constable	Johnson and Constable, ff. Tr. 14846
Walter R. Ferris	Jordan, <u>et al.</u> , ff. Tr. 13645
Richard A. Frazar	Frazar, ff. Tr. 14412
Donald L. Garrison	Garrison, ff. Tr. 15110
Jerome H. Goldberg	Goldberg, ff. Tr. 11491*
Robert F. Heishman	Heishman, ff. Tr. 14846 (follows prefiled testimony of Robert G. Taylor)
Claude E. Johnson	Johnson, ff. Tr. 15118
Eric H. Johnson	Johnson and Constable, ff. Tr. 14846
Don D. Jordan	Jordan, ff. Tr. 11908*
Thomas J. Jordan	Jordan, <u>et al.</u> , ff. Tr. 13645
Alfredo Lopez	Jordan, <u>et al.</u> , ff. Tr. 13645
Frank Lopez Jr.	Bernsen/Lopez, ff. Tr. 13441
George W. Oprea	Oprea, ff. Tr. 14095**

* / Also testified on 12/5/85 without prefiled testimony.

** / Also testified on 12/6/85 without prefiled testimony.

<u>Witness</u>	<u>Prefiled Testimony Cited as</u>
E. Shannon Phillips	Phillips (50.55(e)), ff. Tr.15116 Phillips (Quadrex), ff. Tr. 15192
Jesse Poston	(no prefiled testimony)
Cloin G. Robertson	(no prefiled testimony)
Donald E. Sells	Sells, ff. Tr. 15190
Loren Stanley	Stanley, ff. Tr. 13047***
James R. Sumpter	Sumpter, ff. Tr. 12699 Sumpter (supplemental), ff. Tr. 15357**
Joseph I. Tapia	Tapia, ff. Tr. 13752
Robert G. Taylor	Taylor, ff. Tr. 14846 (fo'lows prefiled testimony of Johnson and Constable)
Dan P. Tomlinson	Tomlinson, ff. Tr. 15112
Charles G. Thrash	(no prefiled testimony)****
Mark R. Wisenburg	Wisenburg, ff. Tr. 14514

**/ Also testified 12/6/85 without prefiled testimony.

***/ Also submitted an affidavit dated December 12, 1985.

****/ Also submitted an affidavit dated September 4, 1985.

Appendix B

List of Phase II Exhibits

<u>No.*</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
<u>Applicants' Exhibits</u>				
57	Handwritten notes re Quadrex preliminary review	4/13/81	11466	11661
58	Memo from J.H. Goldberg to J.R. Sumpter re Quadrex Review of B&R Engineering Problem Categorization, with handwritten notes.	4/15/81	11466	13050
59	Typed and handwritten notes by C.G. Thrash of Management Committee Meeting	4/27/81	11466	11662
60	Quadrex Report, "Design Review of B&R Engineering for STP"	5/81	11466	11487
61	Letter from J.H. Goldberg to E.A. Saltarelli re STP Quadrex Engineering Review	5/6/81	11466	11487
62	Letter from E.A. Saltarelli to J.H. Goldberg enclosing B&R review of most serious findings for reportability	5/8/81	11466	11487
63	Bechtel Power Corporation Report, "An Assessment of the Findings in the Quadrex Corporation Report"	3/82	13442	13460
64	Bechtel Power Corporation Final Work Package Report for Work Package EN-619, "Review of the Quadrex Report"	8/26/82	13463	Rej. (13470)

* Various Exhibits have been admitted only for a limited purpose. Accordingly, in each case, it is necessary to review the appropriate portion of the transcript to ascertain the scope of an Exhibit's admission.

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
65	Letter from L. Stanley to J.R. Sumpter re STP ALARA review	3/16/81	13049	13049
66	Excerpt from STP Procedure Manual Revisions on Reporting Design and Construction Deficiencies to NRC (PLP-02, Rev. 5)	5/21/85	14515	14516
66a	PLP-02, Rev. 6	7/25/85	14573	14574
67	Letter from J.H. Goldberg to R.D. Martin re Supplemental Response/Clarification to the Response to Notice of Violation, Inspection Report 83-24	7/30/85	13646	13652
68	Letter from G.W. Oprea to J.T. Collins re Programmatic Audit of Backfill Activities and Audit Summary	5/25/84	13646	13652
69	Handwritten notes re "New Cost and Schedule"	No Date	12163	12163
70	One page excerpt of C.G. Thrash typed notes of 6/26/81 Management Committee Meeting (p. 2143)	6/26/81	12675	Not Offered (12675)
71	Handwritten notes re ALARA review	3/13/80	12904	12905
72	Letter from R.L. Ashley to B.L. Lex re disposition of Brown & Root and Quadrex comments On Bechtel Task Force Draft Report	11/24/82	13470	13473
73	Reports to NRC on Computer Program Verification		14808	14809
	Letter from G.W. Oprea to K. Seyfrit transmitting 1st Interim Report concerning Computer Program Verification	6/5/81		

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
	Letter from G.W. Oprea to K. Seyfrit transmitting 2nd Interim Report concerning Computer Program Verification	8/27/81		
	Letter from G.W. Oprea to J.T. Collins transmitting 3rd Interim Report concerning Computer Program Verification	12/18/81		
	Letter from G.W. Oprea to J.T. Collins transmitting 4th Interim Report concerning Computer Program Verification	4/22/82		
	Letter from G.W. Oprea to J.T. Collins transmitting 5th Interim Report concerning Computer Program Verification	9/13/82		
	Letter transmitting 6th Interim Report	12/22/82		
	Letter transmitting 7th Interim Report	6/13/83		
	Letter transmitting Final Report	10/14/83		
74	Reports to NRC re HVAC		14809	14810
	Letter from G.W. Oprea to K. Seyfrit transmitting 1st Interim Report concerning HVAC	6/9/81		
	Letter transmitting 2nd Interim Report	7/29/81		
	Letter transmitting 3rd Interim Report	10/23/81		
	Letter from G.W. Oprea to J.T. Collins transmitting Final Report concerning the Fuel Handling Building HVAC Control Air System	4/8/82		

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
	Letter transmitting 4th Interim Report	5/26/82		
	Letter from G.W. Oprea to J.T. Collins transmitting 5th Interim Report concerning HVAC (isolation dampers)	8/6/82		
	Letter transmitting Final Report concerning HVAC	10/20/82		
	Letter transmitting Supplemental Report concerning HVAC	5/17/84		
75	Letter from G.W. Oprea to K. Seyfrit transmitting Final Report concerning Shielding Analysis Verification	6/5/81	14810	14810
76	Letter from G.W. Oprea to J.T. Collins transmitting Response to Notice of Violation 82-02	9/9/82	14811	14811
77	NRC Staff Response to Licensing Board Memorandum and Order regarding the Reportability of Quadrex Report	8/24/84	15025	15032
78	Letter from E.H. Johnson to HL&P re I&E 84-12	11/23/84	15032	15034**
79	C.G. Thrash handwritten notes of STP Management Committee Meeting of 12/4/80 (typed transcription also included)	12/4/80	15397	15397
80	C.G. Thrash handwritten notes of STP Management Committee Meeting of 2/19/81 (typed transcription also included)	2/19/81	15397	15397
81	C.G. Thrash handwritten notes of STP Management Committee Meeting of 2/20/81 (typed transcription also included)	2/20/81	15397	15397

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
82	Exhibits 2 and 3 to STP Management Committee Meeting Minutes of 12/4/80	12/4/80	15439	15441
83	Exhibit 5 to STP Management Committee Meeting Minutes of 2/20/81	2/20/81	15429	15441
84	Excerpt of C.G. Thrash deposition (pp. 1161-63)	7/18/84	15445	15450
85	Excerpts of D.G. Barker handwritten notes of 11/80	11/80	15644	15686
86	Handwritten notes of L. Stanley re 1/2/81 telephone conversation with J.R. Sumpter	1/2/81	15696	Not Offered

NRC Staff Exhibits

136	Special Inspection Report of the Quadrex Corporation, Report on Design Review of Brown and Root Engineering Work for the South Texas Project Units 1 and 2.--NUREG-0948.	1/7/83	14848	14849
137	Guidance - 10 CFR 50.55(e), Construction Deficiency Reporting.	4/1/80	14847	14848
138	Quality Assurance Requirements for the Design of Nuclear Power Plants--ANSI N45.2.11-1974.	1974	14860	14866
139	U.S. NRC Regulatory Guide 1.64--Quality Assurance Requirements for the Design of Nuclear Power Plants (Rev. 2).	6/76	14862	14863
140	Letter from G.L. Madsen to to G.W. Oprea enclosing Investigation Report 82-02.	6/3/82	14863	14864

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
141	Letter from G.L. Madsen to G.W. Oprea enclosing Notice of Violation 82-02.	8/11/82	14864	14865
142	STP Engineering Procedures Manual STP-DC-021-D Engineering Procedure for Engineering Design Deficiencies.	no date	15119	15120
143	General Project Requirements Reporting Significant Deficiencies, Federal Regulation 10 CFR Part 50.55(e) (Bechtel 2.20).	6/1/84	15120	15120
144	Review of Nonconformance Reports for Deficiency Evaluation WPP QCI 5.3 (Rev. 7).	5/22/85	15123	15123
145	PLP-02, Reporting Design and Construction Deficiencies to NRC (Rev. 5).	5/21/85	15123	Withdrawn (15125)
146	PSQP-A8, Trend Analysis Administration (Rev. 3).	2/15/82	15125	15127
147	PSQP-16.3, Project Specific Quality Assurance Procedure, Trend Analysis (Rev. 3).	3/19/85	15126	15126

CCANP Exhibits

71	Memorandum from D.G. Barker to C.G. Robertson re Procedure Deviations Concerning Reportable Deficiencies (including attachments).	6/12/81	11501	12052
72	Section 3 of B&R's Quality Assurance Manual (in effect in May 1981)	no date	14186	14450
73	Letter from J.H. Goldberg to E.A. Saltarelli re in-depth review of B&R technical activities on STP by Quadrex.	2/2/81	11615	11620-21

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
74	Handwritten notes by L. Stanley for briefing of HLP re Quadrex.	3/18/81	11624	11639
75	B&R Assessment of the Quadrex Design Review of the STP (excerpt Quadrex Finding No. 4.1.2.1(b)).	4/82	11789	12023
76	Memorandum from D.D. Jordan to STP Nuclear File re meeting on 6/3 with Tom Feehan regarding Gibbs & Hill letter of intent and B&R's recruiting efforts.	6/3/81	11956	11960
77	Memorandum from D.D. Jordan to STP file re meeting with project partners and with Tom Feehan.	9/15/81	11975	11977
78	Handwritten note to Mr. Jordan by G.W. Oprea transmitting attached draft STP Report on Contractor Replacement dated 9/8/81.	9/11/81	11977	11985
79	Handwritten notes of D.D. Jordan re percent complete.	no date	12007	12013
80	Handwritten notes of D.D. Jordan for meeting with Jack Harbin.	9/18/81	12014	12018
81	Excerpt from B&R Quadrex Assessment re Quadrex Finding No. 4.3.2.1(n).	4/82	12027	12030
82	Quadrex Findings Previously Reported Under 10 CFR 50.55 (e).	no date	12064	Not Offered (12076-77)
83	Meeting Minutes re discussions among STP participants regarding replacement of Architect/Engineer and Construction Manager.	9/22/81	12217	12381

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
84	Excerpt from B&R Quadrex Assessment re Quadrex Finding No 4.8.2.1(g).	4/82	12277	12284
85	L. Sinkin drawings numbered 1-6.	no date	12292	Not Offered (12329-30)
86	Letter from J.H. Goldberg to D.W. Halligan re HLP Comments on Bechtel Task Force Report South Texas Project Electric Generating Station.	4/7/82	12332	12404
87	Statement by J. Goldberg to D.D. Driskill and J.E. Gagliardo concerning Quadrex report (includes handwritten changes).	2/9/82	12337	12338
88	Slides for Quadrex presentation.	no date	12342	12345
89	Handwritten notes by J.H. Goldberg re STP Quadrex Engineering Review.	no date	12423	12424
90	Excerpt from J.H. Goldberg PUC Cross Examination pp. 1355-58.	10/84	12479	12481
91	Excerpt from J.H. Goldberg PUC Cross Examination pp. 1374-80.	10/84	12486	Not Offered
92	Excerpt of Plaintiff's Specification of Claims and Issues (cover and pages 31-39).	12/17/84	12707	Not Offered (12742)
93	Letter from J.L. Hawks to J.L. Blau re Engineering review of B&R.	3/20/81	12756	12760
94	Memorandum from A.B. Poole to M.E. Powell re Primary and Secondary Stress Intensity of 3.35m for Upset Loads.	3/31/81	12786	12787

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
95	Memorandum from M.E. Powell to L.R. Jacobi re IRC Meeting concerning the Primary and Secondary Stress Intensity for Upset Loads in the Design of the Containment Mechanical Penetrations M9, M13 and M17; April 24, 1981 (item #93).	4/27/81	12788	12794
96	Memorandum from J.A. Signorelli to D. Prelewicz re Quadrex STP Review (attached Nuclear Analysis questions).	5/8/81	12799	Rej. (14614)
97	Memorandum from D.A. Prelewicz to J.A. Signorelli re NUS Responses to Quadrex STP Review.	5/11/81	12800	Rej. (14614)
98	Handwritten statement of Jim Sumpter to D.D. Driskill re Quadrex Review.	2/10/82	12861	12863
99	Letter from L. Stanley to L. Sinkin responding to 11/8 inquiry regarding Stanley participation in ASLB hearings.	11/12/83	13051	Rej. (13053)
100	Letter from L. Stanley to J.R. Sumpter responding to request for audit.	1/5/81	13058	13061
101	Letter from J.R. Sumpter to L. Stanley authorizing Quadrex review.	1/27/81	13061	13063
102	"Engineering Review Schedule" --2/10/81-4/2/81	no date	13069	Not Offered (13070)
103	Letter from L. Stanley to J.R. Sumpter outlining format for Quadrex review.	2/13/81	13070	13071
104	Letter from L. Stanley to R.L. Ashley re draft Bechtel Task Force Report.	3/2/82	13128	13309

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
105	Letter from L. Stanley to J.L. Wray re HLP/B&R 10CFR21 Reporting Requirements, and attached memo.	5/18/81	13205	Not Offered
106	Cover letter from T.J. Jordan to L.W. Hurst transmitting STP audit report no. C11-401, with CAR G-508 attached.	10/4/84	13680	13681
107	Closed version of CAR G-508.	10/24/84 (HL&P closure date)	13683	13683
108	STP Management Committee Meeting Minutes of February 19-20, 1981.	2/19-20/81	14104	14107**
109	STP Management Committee Meeting Minutes of March 19-20, 1981	3/19-20/81	14110	14113**
110	STP Management Committee Meeting Minutes of April 27, 1981	4/27/81	14115	14117**
111	STP Management Committee Meeting Minutes of June 26, 1981 (including meeting exhibit 13)	6/26/81	14122	14125**
112	Excerpts of C.G. Thrash type-written and handwritten notes of STP Management Committee Meeting of 6/26/81	6/26/81	14125	14133**
113	STP Management Committee Meeting Minutes of July 23-24, 1981 (including meeting exhibit 9)	7/23-24/81	14142	14243**
114	Excerpt of J.B. Poston handwritten notes of 4/27/81 Management Committee Meeting	4/27/81	14291	Rej. (14290)
115	Letter to Karl Seyfrit from G.W. Oprea re STP Safety Related Activities to continue during Transition Phase (including attachments A and B).	10/16/81	14306	Not Offered

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
116	Handwritten notes of George Oprea for 7/2/81 Oprea, Goldberg, Saltarelli and Rice meeting.	undated	14314	14322
117	Letter from J.R. Newman to G.W. Oprea transmitting draft report on contractor replacement for architect-engineering and construction management services at STP.	9/8/81	14326	14327
118	Agreement Not To Assert Certain Defenses (Executed Tolling Agreement).	12/28/79	14330	14349
119	Handwritten notes of G.W. Oprea of September meetings.	undated	14339	Rej. (14347)
120	Meeting minutes of 9/15/81 meeting re possible Replacement of B&R as engineer and construction manager.	9/22/81	14350	14370**
121	Confidential B&R office memo from K.M. Broom to W.M. Rice re Telephone call to George Oprea of 9/22/81.	9/22/81	14371	14837
122	Statement of G.W. Oprea to D.D. Driskill re B&R and the Quadrex Report.	2/12/82	14377	14377
123	Letter from R.A. Frazar to T.H. Gamon re Audit of B&R Engineering, Audit No. BR-28 (transmittal letter).	9/27/79	14423	14429
	Memorandum from T.D. Stanley to D.G. Barker re Audit No. BR-28.	10/1/79		
	Memorandum from R.A. Frazar to E.A. Turner re Audit No. BR-28 (transmittal letter).	10/1/79		
	Audit No. BR-28	9/4-7/79		

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
	Letter from R.A. Frazar to T.H. Gamon re B&R response to Audit BR-28 (with attachments).	12/26/79		
	Memorandum from D.R. Valley to T.D. Stanley re Resolution of Audit Findings of B&R Audit No. BR-28.	2/31/80		
124	Memo to R.L. Ulrey from B.J. Fite re Auditor's Handbook on Deficiency Reporting (including enclosure).	1/21/81	14430	Not Offered
125	Letter from R.L. Ulrey to R.J. Vurpillat transmitting Audit No. BR-35.	10/24/80	14435	14444
	Memo from R.L. Ulrey to G.W. Oprea transmitting BR-35.	10/24/80		
	Audit No. BR-35.	9/22-26/80		
126	HL&P QA Manual, Controlled Manual No. 70, with Phil D. Franke noted as manual holder. (excerpts from sections, 1 3 and 4 QA Program and South Texas QA Plan section 4)	Issued 11/10/78	14450	14453
126a	Project Quality Assurance Plan Project Engineering Section 4.0 (Revs 5 & 6).	10/29/80	15387	15387
127	C.G. Robertson handwritten notes from April, 1981	4/81	14591	14597
128	Telephone Minutes from M.E. Powell to L.R. Jacobi documenting call from M.E. Powell to W.A. Crossman notifying NRC of three potentially reportable items (HVAC, Computer Codes, Shielding Analysis).	5/8/81	14673	14674
129	Memo from M.E. Powell to L.R. Jacobi re Incident Review Committee Meeting Minutes of May 11, 1981 Meeting Concerning Computer	5/12/81	14675	14682

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
	Program Verification.			
130	Memo from M.E. Powell to L.R. Jacobi re Incident Review Committee Meeting Minutes of May 11, 1981 Meeting Concerning Inadequate Design of HVAC Systems.	5/13/81	14685	14687
131	Memo from M.E. Powell to L.R. Jacobi re Incident Review Committee Meeting Minutes of May 11, 1981 Meeting Concerning Verification of Shielding Analysis Calculations.	5/19/81	14687	14691
132	Memo from M.E. Powell to L.R. Jacobi re Incident Review Committee Meeting Minutes of June 1, 1981 Meeting Concerning Verification of Shielding Calculations.	6/4/81	14691	14695
133	Statement of Cloin G. Robertson to D.D. Driskill re Quadrex.	2/10/82	14704	14706
134	Letter from J.T. Collins to G.W. Oprea re NRC Report 81-37 SALP Board Report and letter from G.L. Madsen to G.W. Oprea enclosing SALP Report 81-37.	6/18/82	15005	15198**
135	Letter from E.H. Johnson to G.W. Oprea re Report on NRC Inspection 83-21.	11/25/83	15141	Not Offered
136	Letter from J.H. Goldberg to R.D. Martin re First Interim Report Concerning Record Packages for the 125 Vdc and 4KV AC Systems.	7/19/85	15148	15154

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
137	Evaluation of South Texas Project by Institute of Nuclear Power Operations (INPO).	4/85	15160	Not Offered
138	Memorandum for P.A. Bradford from W.J. Dircks re Chronology Related to The Quadrex Report on South Texas.	12/15/81	15206	15320
139	Handwritten Notes from H.S. Phillips to J. Collins re Design Engineering STP.	8/27/81	15211	15211
140	Memorandum for File From W.G. Hubacek thru G.L. Madsen and W.A. Crossman re Meeting with HLP Management Related to Quadrex Review of B&R Engineering.	9/11/81	15212	15214
141	Handwritten Notes of D.E. Sells re potential 50.55(e) items and availability of Report.	No date	15215	15219
142	Memorandum for D.G. Eisenhut from D.E. Sells thru R.L. Tedesco and F.J. Miraglia re Summary of Quadrex Report-STP.	10/28/81	15219	Rej. (15221)
143	Meeting Summary of Meeting on 1/18/82 with HL&P by D.E. Sells.	1/26/82	15232	Not Offered
144	Note to D.G. Eisenhut from D.E. Sells Thru R.L. Tedesco and F.J. Miraglia re Comments on South Texas Chronology.	1/26/82	15235	15428**
145	Letter from E.H. Johnson to G.W. Oprea re NRC Inspection Report 84-11 (enclosure inspection report).	9/11/84	15293	Not Offered (15295)
146	Letter from G.W. Oprea to K. Seyfrit re Unlimited Re-Start for ASME Welding and Safety-Related Complex Concrete.	9/18/81	15311	Not Offered

<u>No.</u>	<u>Description</u>	<u>Date</u>	<u>Id.</u>	<u>In Ev.</u>
147	Testimony of Nunzio J. Palladino before Subcommittee on Energy and Environment of Committee on Interior and Insular Affairs U.S. House of Representatives.	11/19/81	15321	Not Offered (15325)
147a	Oversight Hearing--Cover page and pages 92-95.	11/19/81	15330	15330
148	Handwritten chronology of D.D. Jordan of 6/26/81-12/15/81	6/26/81- 12/15/81	***	***

** Only an excerpt from the Exhibits designated with "***" has been admitted into evidence.

*** This document was admitted by the Board in its Order of October 16, 1985.