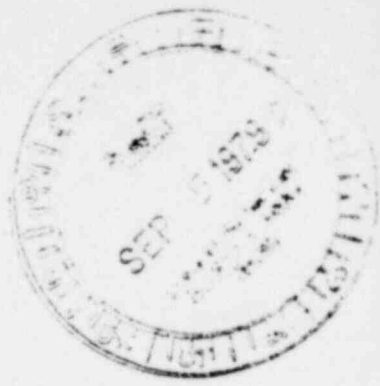


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September 5, 1979

Marshall E. Miller, Esquire  
Michael L. Glaser, Esquire  
Sheldon J. Wolfe, Esquire  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Houston Lighting & Power Company  
South Texas Project, Units 1 and 2  
(Docket Nos. 50-498A and 50-499A)

Gentlemen:

This is the August 1979 discovery report of Houston Lighting & Power Company.

During the month of August, counsel for Houston and/or the Texas Utilities Companies deposed the following individuals:

J.C. Driver	Gate City Electric Cooperative, Inc.
James D. Eiland	Cap Rock Electric Cooperative, Inc.
L.H. Fish	Arkansas Electric Cooperative Corporation

Houston also inspected documents produced by each of the above-named cooperatives in response to subpoenas.

The depositions of W.H. Holcombe, Carl Messer and Carl Morgan have been indefinitely postponed as a result of indications that no party currently intends to call any of these people as witnesses. Houston has retained the right to reschedule these depositions, however, should Tex-La of Texas, or any other party, subsequently decide to name any of these three people as a witness.

Houston has received copies of documents produced by the Farmers Electric Cooperative, Kaufman County Electric Cooperative and the New Era Electric Cooperative. These documents were initially produced in response to subpoenas issued by the Nuclear

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Marshall E. Miller, Esquire  
Michael L. Glaser, Esquire  
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September 5, 1979  
Page Two

Regulatory Commission Staff and the Department of Justice.

Some time ago, Houston examined certain documents made available by Central Power & Light Company and requested copies of some of those documents. CP&L has now furnished Houston with copies of those particular documents.

On August 6, 1979, Houston filed its answer in opposition to the motion of the Department of Justice to compel the production of certain documents which Houston contends are privileged.

Pursuant to a document exchange agreed to by counsel for the Staff and for Houston, the Staff, on August 8, 1979, provided Houston with a list of publications authored by the Staff's expert engineering witness Robert Hartley. The Staff also agreed to provide promptly copies of testimony given by Mr. Hartley in other cases, but these have not yet been provided.

On August 9, 1979, Houston filed its response to the Staff's supplemental request for the production of documents.

Finally, on August 29, 1979, Houston supplied the Public Utilities Board of Brownsville with a list of documents responsive to Houston's discovery requests which Houston seeks to obtain in preparation for the depositions scheduled to begin in Brownsville on September 24.

Respectfully submitted,

*Peter G. Flynn*

Peter G. Flynn  
Attorney for Houston Lighting &  
Power Company

PGF/ar

cc: Attached service list

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
HOUSTON LIGHTING & POWER	)	Docket Nos. 50-498A
COMPANY, et al.	)	50-499A
	)	
(South Texas Project,	)	
Units 1 and 2)	)	
	)	
TEXAS UTILITIES GENERATING	)	Docket Nos. 50-445A
COMPANY, et al.	)	50-446A
	)	
(Comanche Peak Steam Electric	)	
Station, Units 1 and 2)	)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing:  
August 1979 Discovery Report of Houston Lighting &  
Power Company

were served upon the following persons, by hand \*, or by deposit in  
the United States Mail, first class postage prepaid, this 5th day  
of September, 1979.

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