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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 COMPANY § Docket No. 50-466  
§  
(Allens Creek Nuclear Generating Station, Unit 1) §

NOTICE OF DEPOSITION

TO: James M. Scott, Jr.  
8302 Albacore  
Houston, Texas 77074

In accordance with 10 C.F.R. § 2.740(a), you are requested to appear at Baker & Botts, 3000 One Shell Plaza in the city of Houston, Texas, on the 12th day of September, 1979 at 9:00 o'clock A.M. (and thereafter from day to day, if necessary) to testify on behalf of Houston Lighting & Power Company at the taking of a deposition concerning each of TexPirg's admitted contentions in the above-entitled action pending before the Atomic Safety and Licensing Board of the Nuclear Regulatory Commission and to bring with you the document(s) or object(s) described in the attached schedule.

Sincerely yours,

*J. Gregory Copeland*  
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J. Gregory Copeland  
Attorney for Houston Lighting &  
Power Company  
BAKER & BOTTS  
3000 One Shell Plaza  
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(713) 229-1234

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## SCHEDULE FOR DEPOSITION

1. All documents requested in the Applicant's First, Second and Third Interrogatories to TexPirg.

### Instructions

If you claim that any document requested hereunder is privileged, with respect to each such document, please provide the following:

- (a) date;
- (b) type of document;
- (c) identity of author and addresses;
- (d) present location and custodian;
- (e) any other description necessary to enable the custodian to locate the particular document;
- (f) the basis for the claimed privilege; and
- (g) a detailed description of the nature of any judicial protection alleged to be necessary to protect the privilege or confidential nature of any such document.

"Documents" means, without limiting the generality of its meaning, all or original (or copies where originals are unavailable) and non-identical copies (whether different from originals by reason of notation made on such copies or otherwise) of all written, recorded or graphic matter, however produced or reproduced, whether or not now in existence, of correspondence, telegrams, notes or sound recordings of any type of conversation, meeting or conference, minutes of directors' or committee meetings, memoranda, inter-office communications, studies, analyses, notes, books, records, reports, summaries and results of investigations and tests, reviews, contracts, agreements, pamphlets, diaries, calendar or diary entries, maps, graphs, charts, statistical records, computer data or papers similar to any of the foregoing, however denominated, including preliminary versions, drafts or revisions of any of the foregoing and any supporting, underlying or preparatory material.

"Relating to" means consist of, refer to, reflect or be in any way legally, logically or factually connected with the matter discussed.

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Notice of Deposition in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 8th day of August, 1979.

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Hon. Leroy H. Grebe  
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