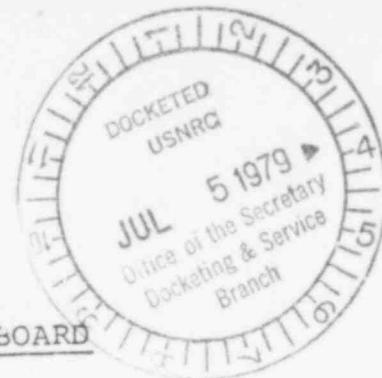


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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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) §

SECOND SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS FROM HOUSTON LIGHTING  
& POWER COMPANY TO CARRO HINDERSTEIN

Pursuant to Section 2.7406 and 2.741 of the Commission's Rules of Practice, Houston Lighting & Power Company (Applicant) propounds this Second Set of Interrogatories and Request for Production of Documents to Carro Hinderstein (Intervenor).

I.

Instructions

1. Each interrogatory must be answered separately and fully in writing under oath or affirmation by the person or persons making them within 14 days from the date of service, and each document requested must be produced no later than 30 days after service of these Interrogatories and Requests for Production.

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2. As used herein the singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun so used, and vice versa; in similar fashion, the use of the masculine form of a pronoun shall be considered to also include within its meaning the feminine form of the pronoun so used, and vice versa; and in a similar fashion, the use of tense of any verb shall be considered to also include within its meaning all other tenses of the verb so used.

3. These Interrogatories shall be deemed continuing, so as to require additional answers if after answering such Interrogatories Intervenor obtains information upon the basis of which she knows a response was incorrect when made, or she knows that the response though correct when made is no longer true and the circumstances are such that a failure to amend the response is in substance a knowing concealment.

4. In your answer, repeat each Interrogatory set forth herein and then set forth the answer thereto separately and fully. As to any Interrogatory, section or sub-section of said Interrogatory that you refuse to answer for any reason, separately state the grounds for any such refusal. Where a complete answer to a particular Interrogatory, section or sub-section of said Interrogatory is not possible, such Interrogatory, section or sub-section of said

Interrogatory should be answered to the extent possible and a statement made indicating the reason for the partial answer.

5. If any response is withheld, in whole or in part, for any reason, including but not limited to any claim of privilege, confidentiality or trade secret, set forth the basis upon which such response is withheld, and include in such explanation a statement of what is being withheld, the whereabouts of all documents referring expressly to whatever response is being withheld, and the identify of all persons who have seen any documents being withheld or have knowledge of the matters being withheld.

## II.

### Definitions

The following definitions and instructions shall apply to these Interrogatories:

1. The words "identify," "identity" or "identification" when used in reference to a natural person means to state his full name and present or last known address, his present or last known position in business affiliation, and each of his positions during the relevant period; when used in reference to a business entity, means to state the name, address and any account or computer number to which such entity is referred to in your records; when used in reference to a document, means to state the type of document (i.e., letter, memorandum,

chart, sound production, report, computer input or output, etc.), the location where it is maintained, all identifying marks and codes, the addressee, the document date, author, and persons to whom copies were sent or persons initiating or reading or approving the document and the name of each of the present custodians of the document. If any such document was, but is no longer in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of, and in each instance, explain the circumstances surrounding an authorization for disposition thereof and state the date or approximate date thereof.

2. The terms "document" or "documentation" mean and include every writing or record of any type and description that is in your possession, control or custody of your attorney's possession, control or custody as of the date of filing your answers to these Interrogatories, including, but not limited to, correspondence, memoranda, stenographic or handwritten notes, drafts, studies, publications, invoices, ledgers, journals, books, records, accounts, pamphlets, voice recordings, reports, surveys, statistical compilations, work papers, data processing cards, computer tapes or print outs, or any other writing or recording of any kind. The

term "document" also includes every copy of a writing or record where such copy contains any commentary or notation of any kind that does not appear on the original or on any other copy. Without limitation of the term "control," a document is deemed to be within your control if you have ownership, possession, or custody of the document or a copy thereof, or the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.

3. "Studies" means all analyses of every type, including but not limited to evaluations, reports, research, examinations, abstracts, criticisms, calculations, tabulations, compilations, compendiums, surveys, books, essays, monographs, and all other investigations, published or unpublished.

4. "Relating to" means relating to in any way and includes the documents which are the subject of the request (e.g. "relating to a study" includes the study itself). Requests concerning a study or basis should be understood to include all input considered and all possible outcomes with respect to such study or basis. For example, requests for documents relating to engineering studies would include all data compiled but not used and all results considered but rejected.

III.

Interrogatories

A. Hinderstein Contention 5

1. State whether you have retained Mr. Howard Saxion as an expert witness. If the answer is yes, answer Interrogatory 2.(a)-(e) of the First Set of Interrogatories and Requests for Production of Documents From Houston Lighting & Power Company to Carro Hinderstein with regard to Mr. Saxion and his testimony.

2. Identify those portions of the document tiled "Water for Texas" dated December, 1974, or the document titled "Water for Texas" dated 1976 you will rely on in this proceeding.

3. Produce all studies and documents showing that Applicant's projections for future water supply from or demand on the Brazos River are in error.

4. Produce all studies and documents showing that conversion from ground water to surface water within the Houston area will place demands on the Brazos River.

5. Have you identified any alternative coastal site where the population density is lower than the population density within the 50-mile radius surrounding the Allens Creek site? If so, produce all studies and documents relating to the lower population density site.

6. Have you identified a specific coastal site which you assert is obviously superior to the Allens Creek site? If so, identify the exact location of this site, specify in detail the criteria used to establish its superiority, and produce all studies and documents you will rely upon to evidence its superiority.

B. Hinderstein Contention 3

1. State every reason, with every fact supporting these reasons, why you contend that Applicant cannot barge the reactor vessel up the San Bernard River without channelizing the river. Provide all assumptions used in answering this question (i.e., weight, length, width, depth, and mean draft (fresh water) of the loaded barge; width and depth of the San Bernard River at the point where you allege the river will have to be channelized, etc.). (b) Specify all adverse environmental effects which you allege will result from Applicant's plan to move the reactor pressure vessel to the site by barging to an unloading point on the San Bernard River and transporting the reactor vessel overland to the site from that point.

C. Hinderstein Contention 9

1. State why the seven airborne radioactivity monitoring stations placed at varying distances out to 20 miles from the plant (as described in PSAR Section 6.2 and FSFES Table 5.6.1) do not satisfy your concerns about "monitoring . . . radioactivity levels . . . ."?

2. What provisions, in addition to those described in the above references, must be added "to ensure the safe operation of the proposed plant"?

3. What chemical air pollutants will be emitted from ACNGS during operation? Produce all studies and documents relied upon in supporting your answer.

4. On what basis do you propose establishing monitoring stations at the plant perimeter and "about 5 miles away"? Produce all studies and documents showing that these distances are optimum or any way preferable.

5. On what basis do you propose monitoring locations predominantly up-wind of the plant (i.e. SSE, SE, and NNE; see FSFES Fig. 5.2.2.)? Produce all studies and documents supporting your answer.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Second Set of Interrogatories and Requests for Production of Documents from Houston Lighting & Power Company to Carro Hinderstein in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 3 day of July, 1979.

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