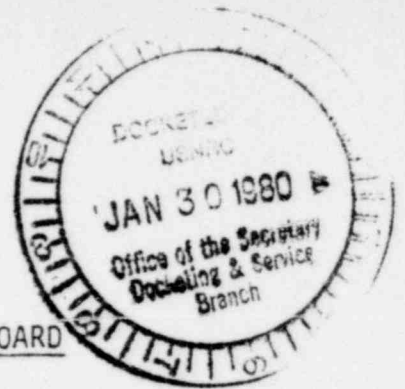


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of:

HOUSTON LIGHTING & POWER
COMPANY, THE CITY OF SAN
ANTONIO, THE CITY OF
AUSTIN, and CENTRAL POWER
AND LIGHT COMPANY

(South Texas Project,
Unit Nos. 1 and 2)

NRC DOCKET NOS. 50-498A
50-499A

In the Matter of:

TEXAS UTILITIES
GENERATING COMPANY,
ET AL

(Comanche Peak Steam
Electric Station,
Unit Nos. 1 and 2)

NRC DOCKET NOS. 50-445A
50-446A

MOTION FOR PROTECTIVE ORDER

In connection with the deposition in Houston, Texas, on November 16, 1979 of James Barney Phillips, employee of Exxon Coal USA, Inc. (The Synthetics Fuels Department of The Carter Oil Company was transferred, effective January 1, 1980, to a new subsidiary of Exxon Corporation, Exxon Coal USA, Inc.), and with the production of Carter Oil documents at that time, both pursuant to subpoena issued by the Atomic Safety and Licensing Board (the "Board"), a stipulation was entered into between the attorneys representing the Department of Justice, Houston Lighting & Power Company, Texas Utilities Generating

Company, Central Power and Light Company, Tex-La Electric Cooperative of Texas, The Carter Oil Company, and the Nuclear Regulatory Commission. In the stipulation, these parties agree to a protective order governing use and dissemination of certain of the produced documents and certain responses of the witness in the deposition transcript, which documents and transcript portions contain information of a confidential and proprietary nature. Further, during the deposition and after signing of the stipulation, the parties agreed, and the transcript so reflects on page 20, that the entire deposition testimony should be subject to the restrictions of the protective order.

We hereby move the Board to issue the order contained in the stipulation, a copy of which is attached hereto, with the order further to note that the entire deposition testimony is protected thereby. Copies of this motion have been served on the parties to the captioned proceeding as listed on the attached Certificate of Service.

This motion is respectfully submitted by the following legal counsel for Exxon Coal USA, Inc.:

Kenneth P. Fountain (by J.P.P.)
Kenneth P. Fountain

Paul Plummer
J. Paul Plummer
P. O. Box 2180
Houston, Texas 77001