UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of )

HOUSTON LIGHTING AND POWER CO., et al. ) Docket Nos. 50-498A
50-499A

(South Texas Project, Units 1 and 2) )

TEXAS UTILITIES GENERATING COMPANY, et al. ) Docket Nos. 50-445A
50-446A

(Comanche Peak Steam Electric Station, Units 1 and 2) )

DOCKETED
MAR 6 1979
Office of the Secretary

REPORT OF TUGCO, et al., - FEBRUARY, 1979

Pursuant to the direction of the Atomic Safety and Licensing Board during the Special Prehearing Conference on June 21, 1978 (Tr. 124-125) in South Texas, and during the conferences in Comanche Peak and South Texas on December 5, 1978 (Tr. 79-90), TUGCO submits this report on discovery during the month of February, 1979.

During the month, TUGCO was engaged in preparation of responses and objections to the interrogatories and requests for production by the NRC Staff. Similarly, TUGCO was engaged in the preparation of responses and objections to the interrogatories and document requests of the Public Utilities Board of the City of Brownsville.

During February, TUGCO transmitted to Justice certain documents apparently missing from copies made at the Department's request last Fall and also provided certain explanations and

7904170078

clarifications regarding the same. TUGCO also prepared its response to the Department's motion to compel.

Finally, TUGCO received at the end of the month interrogatories and requests for production of documents served by mail by Central Power and Light Company on February 23, 1979. Initial review indicates that an appropriate extension of time will be required for response or other appropriate pleadings with respect to this request.

Respectfully submitted,

Joseph B. Knotts, Jr.
DEBEVOISE & LIBERMAN
1200 Seventeenth Street, NW
Washington, D.C. 20036

Date: March 5, 1979

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

## CERTIFICATE OF SERVICE

I hereby certify that copies of "Report of TUGCO, et al February, 1979" in the captioned matters, were served upon the following persons by deposit in the United States mail, first class postage prepaid this 5th day of March, 1979.

Marshall E. Miller, Esq.
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Michael L. Glaser, Esq.
1150 17th Street, N.W.
Washington, D.C. 20036

Sheldon J. Wolfe, Esq.
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Chase R. Stephens
Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Jerome D. Saltzman
Chief, Antitrust and Indemnity Group
Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

J. Irion Worsham, Esq.
Merlyn D. Sampels, Esq.
Spencer C. Relyea, Esq.
Worsham, Forsythe & Sampels
2001 Bryan Tower, Suite 2500
Dallas, Texas 75201

Jon C. Wood, Esq.
W. Roger Wilson. Esq.
Matthews, Nowlin, Macfarlane & Barrett
1500 Alamo National Building
San Antonio, Texas 78205

Charles G. Thrash, Jr., Esq.
E.W. Barnett, Esq.
Theodore F. Weiss, Esq.
J. Gregory Copeland, Esq.
Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

R. Gordon Gooch, Esq.
John P. Mathis, Esq.
Baker & Botts
1701 Pennsylvania Avenue, NW
Washington, D.C. 20006

Roy P. Lessy, Jr., Esq.
Michael B. Blume, Esq.
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Roff Hardy
Chairman and Chief Executive Officer
Central Power and Light Company
P.O. Box 2121
Corpus Christi, Texas 78403

Mr. Perry G. Brittain
President
Texas Utilities Generating Company
2001 Bryan Tower
Dallas, Texas 75201

R.L. Hancock, Director
City of Austin Electric Utility
P.O. Box 1086
Austin, Texas 78767

G.W. Oprea, Jr.
Executive Vice President
Houston Lighting & Power Company
P.O. Box 1700
Houston, Texas 77001

Judith Harris, Esq.
Ronald Clark, Esq.
U.S. Department of Justice
Antitrust Division
P.O. Box 14141
Washington, D.C. 20044

Don R. Butler, Esq.
Sneed, Vine, Wilkerson, Selman & Perry
P.O. Box 1409
Austin, Texas 78767

Jerry L. Harris, Esq.
Richard C. Balough, Esq.
City of Austin
P.O. Box 1088
Austin, Texas 78767

Don H. Davidson
City Manager
City of Austin
P.O. Box 1088
Austin, Texas 78767

Robert Lowenstein
J. A. Bouknight, Jr.
William J. Franklin
Lowenstein, Newman, Reis & Axelrad
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

John W. Davidson, Esq.
Sawtelle, Goode, Davidson & Tioilo
1100 San Antonio Savings Building
San Antonio, Texas 78205

Douglas F. John, Esq.
Akin, Gump, Haver & Feld
1100 Madison Office Building
1155 15th Street, N.W.
Washington, D.C. 20005

Morgan Hunter, Esq.
McGinnis, Lockridge & Kilgore
Fifth Floor, Texas State Bank Building
900 Congress Avenue
Austin, Texas 78701

Richard D. Cudahy, Esq.
Joseph Gallo, Esq.
Robert H. Leoffler, Esq.
Isham, Lincoln & Beale
1050 17th Street, N.W.
Suite 701
Washington, D.C. 20036

Michael I. Miller, Esq.
Richard E. Powell, Esq.
David M. Stahl, Esq.
Thomas G. Ryan, Esq.
Isham, Lincoln & Beale
One First National Plaza
Chicago, Illinois 60603

Bill D. St. Clair, Esq.
McGinnis, Lockridge & Kilgore
Fifth Floor, Texas State Bank Building
900 Congress Avenue
Austin, Texas 78701

W.S. Robson
General Manager
South Texas Electric Cooperative, Inc.
Route 6, Building 102
Victoria Regional Airport
Victoria, Texas 77901

Robert C. McDiarmid, Esq.
Robert Jablon, Esq.
2600 Virginia Avenue, N.W.
Washington, D.C. 20037

Kevin B. Pratt, Esq.
Attorney General's Office
State of Texas
P.O. Box 12548
Austin, Texas 78711

Frederick H. Ritts, Esq.
William H. Burchett, Esq.
Northcutt Ely
Watergate 600 Building
Washington, D.C. 20037

Joseph B. Knotts, Jr.