

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)	
No. 1 and 2))	
)	
)	
)	
In the Matter of)	
)	
TEXAS UTILITIES GENERATING COMPANY,)	Docket Nos. 50-445A
et al.)	50-446A
)	CONSOLIDATED FOR DISCOVERY
(Comanche Peak Steam Electric)	
Station, Units 1 and 2))	

TO: Marshall E. Miller, Chairman
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

MOTION FOR AN EXTENSION OF TIME
WITHIN WHICH TO ANSWER INTERRO-
GATORIES AND PRODUCE DOCUMENTS

Central Power & Light Company ("CPL"), by its attorneys, pursuant to 10 C.F.R. Section 2.730, hereby moves this Board for the entry of an Order extending the time within which CPL has to respond to certain discovery requests up to and including February 20, 1979. In support of this Motion, CPL states as follows:

(1) On January 3, 1978, the Public Utilities Board of the City of Brownsville, Texas ("PUB") served upon

CPL Interrogatories and a Request for Production of Documents in NRC Docket Nos. 50-498A and 50-499A.

(2) On January 5, 1979, PUB served upon CPL a "corrected" initial Interrogatories and Request for Production of Documents. In addition, on January 8, 1978, PUB, through correspondence from its counsel, served upon CPL another "corrected" version of Interrogatories and Request for Production of Documents.

(3) The Corrected Initial Interrogatories and First Request for Production of Documents served upon CPL consists of 37 separate items, many of which are divided into numerous subparagraphs. Compliance with the discovery request, accordingly, will entail substantial time and effort; a 14-day time table for compliance appears unrealistic, especially in light of the repeated "corrections" served upon CPL.

(4) Counsel for CPL has contacted counsel for PUB and is authorized to state that PUB has no objection to this extension.

WHEREFORE, CPL respectfully requests that this Board extend the time within which CPL has to comply

with PUB's discovery request up to and including February 20,
1979.

Respectfully submitted,

ISHAM, LINCOLN & BEALE

By


Thomas G. Ryan

DATED: January 17, 1979

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) SS
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CERTIFICATE OF SERVICE

I, THOMAS G. RYAN, hereby certify that I served
a copy of the foregoing Motion by depositing a true and
correct copy thereof in the U.S. Mail chute at One First
National Plaza, Chicago, Illinois this 17th day of
January, 1979 to the following parties:

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