

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of	)	
HOUSTON LIGHTING & POWER COMPANY	)	NRC Docket Nos. 50-498A
PUBLIC SERVICE BOARD OF SAN ANTONIO	)	50-499A
CITY OF AUSTIN	)	
CENTRAL POWER AND LIGHT COMPANY	)	
(South Texas Project, Unit Nos.	)	
1 and 2)	)	
TEXAS UTILITIES GENERATING	)	NRC Docket Nos. 50-445A
COMPANY, et al.	)	50-446A
(Comanche Peak Steam Electric	)	
Station, Units 1 and 2)	)	

NRC STAFF'S INITIAL INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO HOUSTON LIGHTING & POWER COMPANY AND TEXAS UTILITIES GENERATING COMPANY

Preface

Pursuant to 10 C.F.R. Sections 2.740, 2.740b, and 2.741, the NRC Staff hereby propounds the following interrogatories and document requests to Houston Lighting & Power Company ("HL&P"), an applicant in the South Texas operating license antitrust proceeding, and to Texas Utilities Generating Company, Dallas Power & Light Company, Texas Power and Light Company and Texas Electric Service Company (hereinafter collectively referred to as "TU"), applicants in the Comanche Peak antitrust operating license proceeding, and parties to the aforesaid South Texas proceeding. Responses to interrogatories are due within fourteen (14) days after service unless the presiding officer allows a longer period, 10 C.F.R. §2.740b(b). In addition, document production is required within thirty (30) days, 10 C.F.R. §2.741(d). However, the Staff will endeavor to cooperate with the above applicants to assure an adequate response time which does not adversely affect the hearing (or discovery) schedule.

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Instructions

1. Answer the following interrogatories separately (by parts) and fully in writing under oath or affirmation.
2. Restate the interrogatory or document request as the first part of the answer.
3. If any person significantly assisted in the preparation of any answer other than signatory counsel or affiant, state that person's name, address, employer, title, and telephone number.
4. If any interrogatory or part thereof is objected to, state separately (by part) the objection and basis therefor.
5. Documents produced shall be grouped and marked by interrogatory.
6. If privilege is claimed as to any document, identify the date of the document, the sender(s), the recipient(s) of all copies, the subject matter of the document, and the privilege claimed.
7. If any document requested is unavailable, explain the circumstances of such unavailability.
8. Any request to list, name, or identify a person or employee requires a statement of the person's full name, current employer and business address, position held, and telephone number.
9. For interrogatories 40 through 45, HL&P is to provide the requested information only for South Texas Project Units 1 and 2; TU is to provide such information only for Comanche Peak Units 1 and 2.

10. Pursuant to the direction of the presiding Licensing Board on June 21, 1978, these interrogatories and requests for documents are continuing and require supplemental answers should Houston or TU obtain or identify supplemental information or documents.

Definitions

In the event any word, term, or phrase is unclear to Houston and/or TU, it is requested that oral clarification be requested of the undersigned staff counsel. Any word, term, or phrase is to have its generally accepted meaning. Listed below, are specific definitions pertinent to this pleading:

1. "Documents" means all writings and records of every type in the possession, control or custody of the company, its directors, officers, attorneys, employees or agents, including, but not limited to, memoranda, correspondence, reports, surveys, evaluations, charts, books, minutes, notes, agenda, diaries, transcripts, microfilm, accounting statements, telephone and telegraphic communication, speeches, and all other records, written, electrical, mechanical or otherwise, but excluding documents relating to the design, construction or routine operation of electrical facilities. Where engineering feasibility studies or reports are furnished, the underlying detailed data need not be supplied.

"Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody or control of the company, and every copy of a document which contains handwritten or other notations or which otherwise do not duplicate the original or any other copy.

2. "Relate(s) to" means relating to in any way and includes documents which are the subject of the request. (e.g., "relating to a contract" includes the contract itself). Requests concerning a subject or item should be understood to include possible or contemplated actions as to such subject or item. For example, requests for documents relating to interconnection plans would include documents relating to interconnection arrangements that have been considered but rejected.

3. "ERCOT" means the Electric Reliability Council of Texas.

4. "TIS" means the Texas Interconnected System and its predecessor organizations, the South Texas Interconnected System and the North Texas Interconnected System.

5. "TU/HL&P" means TU and/or HL&P.

6. "Reliability council" means a group of electric utilities that reports to the National Electric Reliability Council on a regular basis, such as ERCOT or the Southwest Power Pool.

#### Interrogatories

1. (a) List all consultants and/or expert witnesses (in-house or otherwise) who may be used in the captioned NRC proceeding.
- (b) Provide in addition to names, that information specified in Instruction 8, supra.

- (c) Provide a copy of any contracts, letter agreements, or other understandings between the individual or firm which relate to, in any way, the NRC proceeding.
  - (d) Provide all significant documents addressed to the above individuals which relate to possible testimony before the NRC, the SEC, the Texas PUC, or any United States District Court.
  - (e) Provide all documents received from the above individuals as described in (d).
  - (f) State the express assignments as well as other instructions given the above individuals.
  - (g) For each consultant and/or expert witness listed in (a), list each person or entity contacted by the consultant or expert in the course of his duties (i) for the NRC proceeding, (ii) the District Court (Dallas) antitrust proceeding, and (iii) the Texas PUC proceeding. (Exclude support personnel, clerical personnel, and attorneys of record for HL&P and/or TU).
  - (h) Provide all documents which relate to this interrogatory (exclude those documents covered in (d) and (e)).
2. (a) List and explain in detail all benefits, actual or perceived, which HL&P/TU consider pertinent to, and/or relate to the decision, policy, or preference, to remain in intrastate commerce.
- (b) List and explain in detail all detriments, actual or perceived, which HL&P/TU consider pertinent to, and/or relate to a judicial or administrative order having the effect of ordering HL&P/TU into interstate commerce.

- (c) List and explain in detail all benefits, actual or perceived, which HL&P/TU consider pertinent to, and/or relate to, being ordered into interstate commerce as described in (b).
  - (d) Provide all documents directly addressing the substance of this interrogatory.
- 3.
- (a) List the TU/HL&P employees and/or representatives who participated in the discussions leading to the formation of ERCOT.
  - (b) Did TU/HL&P consider the possibility of a reliability area or council encompassing, in part or in full, a larger or smaller area than what is now ERCOT. Explain in detail.
  - (c) List and explain in detail the considerations for TU/HL&P which contributed to the formation of a reliability area - ERCOT - separate and apart from a larger area.
  - (d) List and explain the criteria and qualifications for becoming a member in ERCOT, (i) now, and (ii) at the time of its formation.
  - (e) Provide all documents relevant to this interrogatory.
- 4.
- (a) Explain in detail the methods of allocating voting power for both ERCOT and TIS, and state the percentage of votes controlled by TU/HL&P, respectively, in each of these organizations.
  - (b) State the annual TIS and ERCOT budgets for the past five years.
  - (c) State individually TU/HL&P's annual contributions since 1970 both in dollars and in percentage of total contributions for TIS and ERCOT, respectively.

- (d) State the annual dollar amounts budgeted by TU/HL&P since 1970 for system planning, including studies, for TIS and ERCOT, respectively.
  - (e) Explain in detail the purposes and functions of ERCOT and TIS. What are their similarities? What are their differences?
  - (f) Provide all documents relevant to this interrogatory.
5. (a) List separately, the names of all entities which have requested membership in TIS and/or ERCOT since 1965 (include informal requests).
- (b) Give the response to each such request for membership in TIS and/or ERCOT. Explain in detail the bases for each such response and the name or names of the individual or individuals responding to such request. (See Instruction 8).
- (c) Provide all documents which relate to this interrogatory.
6. (a) Describe in detail all known instances since 1961 in which TU/HL&P wholesale customer(s) and/or other members of ERCOT considered interconnecting with or dealing in any way with interstate electric utility companies.
- (b) Describe in detail TU/HL&P's response(s) to specific proposals by its wholesale customer(s) and/or other members of ERCOT to interconnect or deal in any way with interstate electric utility entities.

- (c) Name those persons having personal knowledge of any discussions, negotiations, or studies involving the possibility of transactions between TU/HL&P wholesale customers and/or other members of ERCOT with interstate electric utility entities.
  - (d) Insofar as not answered in TU/HL&P's response to Interrogatory Number 8 of the First Set of Interrogatories...from Department of Justice to HL&P/TU in this proceeding, state, describe, and summarize relevant details concerning, and list each person involved in every occasion since 1961 on which TU/HL&P has sought to influence its wholesale customer(s) or other members of ERCOT as to the merits of intrastate-only operation.
  - (e) Provide all documents which relate to the above interrogatory.
7. (a) Describe in detail the content of the conversations between Messrs. C. Thrash, W.R. Brown, and J.A. Gooch mentioned in HL&P's response No. XV in its Answers To Plaintiff's First Set of Interrogatories, filed in Civil Action No. 3-76-0633F, in the United States District Court for the Northern District of Texas, Dallas Division.
- (b) Identify the person or persons who made the final decision for TU/HL&P to disconnect from TIS on May 4, 1976. Identify the time and place of this decision, and list any other persons present.

- (c) Provide all documents which relate to the above interrogatory.
8. (a) List TU/HL&P's projected loads, generating capacity, and installed generating reserves for the years 1979-89.
- (b) Will TU/HL&P's current and planned installed reserves for the years 1979-1989 satisfy TIS reliability criteria? If not, detail the entities with which TU/HL&P plans to deal, and in what ways (e.g., purchases of firm and economy energy) to assure the reliability of its system.
- (c) Does TU/HL&P contend that interconnection with interstate utility entities can be of no assistance in terms of offering greater flexibility to alleviate capacity shortages and excesses. Explain in detail.
- (d) Provide all documents which relate to this interrogatory.
9. (a) Is it the policy of TIS members to normally operate their transmission interconnections unloaded?
- (b) If the answer to subpart (a) above is yes, then recite the terms of the agreements and any guidelines which relate to that policy, indicating the agreement, its date, and the portion(s) quoted.
- (c) Is there presently sufficient transmission capacity in TIS to allow for the economy energy exchange transactions contemplated in the study performed for HL&P by Stagg Systems, Inc.? Explain in detail.
- (d) Provide all documents which relate to the above interrogatory.

10. (a) Does HL&P/TU contend that ERCOT is presently an "optimal" size?
- (b) Does HL&P/TU contend that ERCOT will in the future be an "optimal" size?
- (c) If the answer to either subparts (a) or (b) above is "yes", then explain in detail the bases for such contention.
- (d) If ERCOT is an optimal size for a system presently utilizing primarily gas-fueled generation, will the same be true when ERCOT uses primarily non-gas generation? Explain in detail.
- (e) Has the development and movement towards increasingly greater capacities for EHV transmission had any effect on HL&P/TU's views on interconnection with interstate electric utilities? Explain in detail.
- (f) Has the increasing cost of fuels and generation facilities had any effect on HL&P/TU's views on interconnection with interstate electric utilities? Explain in detail.
11. (a) In what parts of its service area is HL&P/TU experiencing the greatest load growth? ("parts" refers to geographic locations or portions of service areas).
- (b) List any other electric utilities which have transmission or distribution planned or in place in these areas.
- (c) List any entities which have challenged HL&P/TU's right to serve these areas of rapid load growth.
12. From which types of service do HL&P/TU realize the greatest rate of return? List types of service yielding greatest rate of return to smallest rate of return, including approximate numbers or percentages reflecting relative rates of return.

13. (a) Does the study performed by Stagg Systems [hereinafter referred to as the "Stagg Study"] for HL&P constitute a commitment by HL&P to share its lowest cost fuels with other systems under central economy dispatch? Explain in detail. (Houston and TU answer required).
- (b) Is TU willing to engage in central economy dispatch in a manner contemplated by HL&P's "Stagg Study"? Explain in detail. (Houston and TU answer required).
- (c) Is TU willing to engage in transactions with other entities which would involve sales or exchanges of its lignite-generated power? Explain in detail. (Houston and TU answer required).
14. List all joint generation and transmission projects planned or engaged in to date between HL&P/TU and other ERCOT members.
15. (a) List those transactions since 1965 in which TU/HL&P has provided third-party wheeling for other entities.
- (b) List those occasions on which HL&P/TU has been asked orally or in writing, to provide third-party wheeling.
- (c) List and explain in detail those occasions on which HL&P/TU has orally or in writing declined or otherwise not been able to wheel for others.
- (d) Supply all documents which relate to subparts (b) and (c) of this interrogatory.

16. (a) State the amounts (in MW) of installed generation reserves required to meet HL&P/TU's planning criteria for each year from 1970-1978.
  - (b) State the amounts (in MW) of actual installed generation reserves on HL&P/TU's system for each of the years since 1970.
  - (c) Specify and explain the arrangements which were entered into to dispose of any excess.
  - (d) Quantify the amount of undisposed excess for each of the years since 1970.
17. (a) Detail the arrangements which TU/HL&P have entered into to dispose of any excess capacity for each of the years from 1978 until 1987.
  - (b) Quantify the expected amount of undisposed excess capacity for each of the years from 1978 until 1987.
18. State in percentage terms for the period since 1970 the growth of HL&P/TU's:
    - (a) loads,
    - (b) transmission capacity, and
    - (c) service areas.
19. State whether, in what forms (e.g., wholesale, retail, new electrical, industrial, etc.), and to what extent TU/HL&P competes with Gulf States Utilities Company for new or existing loads or customers.

20. (a) Regarding the 1968 interconnection study performed by TU, Gulf States Utilities, and HL&P, list the individuals who participated, their company affiliations, titles, and responsibilities in producing this study.
- (b) Provide all documents which relate to the production of this study, including but not limited to draft studies, correspondence, memoranda, and notes relating to the purpose, scope, and results of the study.
21. Explain in detail the impact and significance of the Docket #14 proceeding at the Texas P.U.C. on the NRC operating license antitrust proceeding.
22. Provide any studies or other documents which analyze or balance the comparative benefits and costs of installing non-gas generation, and/or converting existing gas generation to other fuels prior to the end of the useful life of present gas units.
23. (a) Explain in detail the basis for HL&P's assertion in the Texas PUC's Docket #14 proceeding that interconnection of SWPP with ERCOT would cost Texas consumers \$1 billion.
- (b) Provide all documents which relate to this interrogatory.
- (c) List the names of those HL&P or the employees, agents, or consultants who had or have personal knowledge of the data or studies underlying this cost estimate.

24. Provide HL&P/TU's data provided to ERCOT for reply to FPC/FERC Docket #362 for each year since 1973.
25. (a) HL&P: state the current capital cost projections in dollars per kilowatt and the projected annual cash flow to meet the projected construction schedule for the South Texas Project.  
(b) TU: provide the same information for Comanche Peak.
26. State the "equivalent forced outage rates" as defined by the EEI Prime Movers Committee currently used by HL&P/TU for planning purposes by estimated size of unit for:
  - a. nuclear power plants beginning with Comanche Peak and South Texas, and continuing to future planned units on long-range projections.
  - b. lignite plants.
  - c. coal plants.
  - d. gas plants.
27. Provide copies of all TU/HL&P long-range transmission plans for the bulk power system with supporting technical studies, such as normal and emergency power flow studies, and stability studies.
28. Describe the method used in determining the amount of power to be delivered to Southwestern Power Administration (SPA) "preference" customers after TU has received power from the Denison Dam. (HL&P answer not required).

29. (a) How much energy (in kwh) has TU received in the last five years (on a year-by-year basis) from the Denison Dam hydroelectric facility? (HL&P answer not required).
- (b) How much energy (in kwh) has TU delivered in the last five years (on a year-by-year basis) to SPA preference customers that was based on the energy that TU has received from the Denison Dam hydroelectric facility? (HL&P answer not required).
30. List the Texas municipals and/or REA cooperatives that receive energy in part from TU and in part from an interstate electric utility that also serves the aforementioned municipalities and/or REA cooperatives. (HL&P answer not required).
31. (a) Provide all documents concerning the purpose, benefits, detriments, feasibility, and any limitations of the 345 kv interconnections between HL&P and TU.
- (b) Provide all documents pertaining to the cost allocations, design and operating criteria, and the respective rights and responsibilities of HL&P and TU with respect to the planning, construction and operation of the HL&P/TU 345 kv interconnections.

32. (a) Does HL&P/TU contend that it had no knowledge that CSW and/or its subsidiaries contemplated the integration of the CSW system prior to 1974? Explain in detail.
- (b) Provide all documents upon which HL&P/TU bases its response.
33. (a) Does HL&P/TU contend that CPL and WTU(s) are generally in a better position in intrastate ERCOT than in an interstate ERCOT? Explain in detail.
- (b) Does HL&P/TU contend that there are no opportunities for bilateral exchanges and/or coordinated services between any intrastate-ERCOT entities and any interstate entities. Explain.
- (c) Provide all documents upon which HL&P/TU bases its response.
34. (a) Does HL&P/TU presently submit Forms 1 & 12 to the FERC?
- (b) Does HL&P/TU presently utilize the FERC uniform system of accounts?
- (c) If the answer to subsection (b) is in the negative, briefly describe the differences between present accounting systems and the FERC Uniform System of Accounts.
35. Provide all documents, reports, and studies on a company by company basis supplied to ERCOT for inclusion in the NERC "Eighth Annual Review Of Overall Reliability On Adequacy Of the North American Bulk Power Systems" dated August 7, 1978. Provide such data not only for HL&P/TU, but also for any other electric system whose data HL&P/TU possess.

36. Provide data with respect to each interconnection at 110 kv or above that HL&P/TU has or plans to have with another company or with each other by 1987, as follows:
- (a) name of the interconnected electric utility;
  - (b) length of the portion of the interconnection owned by HL&P/TU and length of the portion of the interconnection owned by the other electric utility;
  - (c) date that the interconnection was first committed;
  - (d) date that the interconnection was or will be energized;
  - (e) kv rating and MVA or ampere normal and emergency ratings as used by the HL&P/TU operators;
  - (f) relay loadability in amperes;
  - (g) method of determining the value specified in (f);
  - (h) cost of the right-of-way;
  - (i) cost of the transmission line;
  - (j) cost of the terminal facilities at each end of the line;
  - (k) any documents suggesting that the interconnection has had or may have an adverse impact on any other electric utility other than those directly interconnected by the interconnection line;
  - (l) compensation paid or to be paid to any electric utility other than those directly interconnected by the line, because of the impact of the interconnection on the other electric systems;

- (m) identify by title, date, etc. each load flow case, each transient stability case, each cost or economic feasibility study, and each engineering report conducted or prepared in connection with the planning of the interconnection;
  - (n) designate each electric utility that contributed monetarily to the planning studies made in connection with the interconnection; and
  - (o) for existing interconnections, dates of each instance since '65 when the interconnection was manually or automatically opened because of an overload condition, and discussion of the reasons for the overload condition.
  - (p) for existing interconnections, dates of each instance since 1965 when the interconnection was manually opened or automatically opened for more than 60 seconds for reasons other than overload, and discussion of the reasons.
37. (a) Provide a transmission map of all transmission lines of 110 Kv or greater that TU/HL&P has or plans to have by 1985. Include an X-Y coordinate system on the map suitable for identifying the location of each transmission line (or line segment). Provide data as follows:
- (b) the terminal or tap point names (or symbols) and location of each in terms of the X-y coordinates on the map.

- (c) the length of the line (or line segment)
  - (d) date when first committed
  - (e) date that the line was or will be energized
  - (f) Kv rating
  - (g) loadability of the line in amperes or MVA at 90% power factor
  - (h) for existing lines, dates of each instance since 1965 when the line was manually opened or automatically opened because of overload and discussion of the reasons for the overload condition.
  - (i) for existing lines, dates of each instance since 1965 when the line was manually opened or automatically opened for more than 60 seconds for reasons other than overload and discussion of the reasons.
38. Provide dates for each instance since 1965 that load has been manually or automatically shed by TU/HL&P, and discuss the approximate amount of load shed, the length of time, the method used, and the cause.
39. Provide dates for each instance since 1965 that TU/HL&P has had to restrict the output of any of its generators to avoid overloading any of its transmission lines or interconnections of 110 Kv or greater. For each instance identify the transmission lines or interconnections that would have been overloaded and reasons for the prospective overload condition.

40. Provide a listing of each load flow case and each transient stability case used in the analysis of the transmission requirements for the South Texas and Comanche Peak units, including:
- (a) the case number;
  - (b) the date when the case was run;
  - (c) the case title;
  - (d) description of the condition studied if not indicated by the case title;
  - (e) any summary discussions of the case that were prepared;
  - (f) for the stability studies, designation of any unstable cases.
41. Describe the organizational and administrative structure used for conducting the load flow and transient stability studies for the transmission planning for the South Texas Units or Comanche Peak Units including, but not necessarily limited to:
- (a) listing of each electric utility involved in the studies, and description of how each was represented, including names and titles of those senior professional and managerial persons who actively participated in the studies;
  - (b) methods and formulae used in allocating costs of the studies among the electric utility participants;

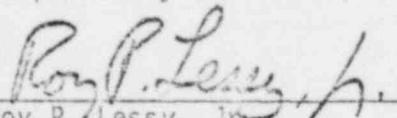
- (c) methods and formulae used in allocating the decision making rights among the electric utility participants;
  - (d) description of any committees or similar study groups with oversight responsibilities with respect to the preparation or analysis of the studies;
  - (e) description of the computer facilities used and the method of interfacing with the study group;
  - (f) names and affiliations of those senior personnel responsible for collecting, coordinating and checking or otherwise preparing the input data;
  - (g) names and affiliations of those senior personnel responsible for the final determination of the system configurations and conditions that were studied; and
  - (h) names and affiliations of those responsible for the analysis of the results.
42. (a) Provide a computer printout, including input data and area interchange summaries, of the latest normal peak load system condition load flows for the time that the South Texas Units or Comanche Peak Units will first be in commercial operation. If the actual system configurations have not been determined as yet, and several system configurations are being considered, provide the computer printouts for each configuration and describe the considerations or factors which will determine the final configuration.

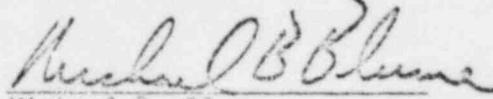
- (b) Provide a transmission map suitable for identifying the location of each bus used in the load flow analysis in terms of X-Y coordinates, and so identify each bus location. If not clearly indicated by the computer print-out, provide the following:
    - 1. nominal bus voltages;
    - 2. summary of area interchanges; and
    - 3. the control area in which each bus is located.
43. (a) Provide all documents discussing or describing the impacts of the transmission for the South Texas units and/or Comanche Peak Units on the underlying voltage transmission systems.
- (b) Provide all documents recommending changes to the underlying transmission system as required to integrate the South Texas and/or Comanche Peak Units into the overall and respective systems.
- (c) HL&P: provide all documents discussing compensation to non-participants in the South Texas Project due to the impact of the South Texas Project on non-participant systems.
44. Provide all documents pertaining to cost estimates and cost allocations for the transmission additions and related connections chargeable to the South Texas and/or Comanche Peak Units, including any changes or additions required to the underlying lower voltage networks.

45. Provide the latest cost estimates for the transmission additions and related connections, including any additions required to the underlying lower voltage networks, for the South Texas or Comanche Peak Units. Provide separate cost estimates for:
  - (a) Right-of-way;
  - (b) Extra High Voltage (EHV) transmission lines;
  - (c) EVH terminal facilities;
  - (d) Lower voltage (LV) additions and connections;
  - (e) allocation of costs to each participant; and
  - (f) compensation to non-participants due to the impact of South Texas transmission.
46. List and describe all instances that TU/HL&P has paid or plans to pay compensation to another electric utility due to the impact that its transmission additions has had or will have on other electric systems.
47. List and describe all instances of which TU/HL&P is aware in which any electric utility has paid compensation to another electric utility due to the impact that the transmission additions of the one utility had or may have had on the system of another.
48. Identify and provide each operating guide, each written set of instructions, directions, tabulations or other means used by the system operators to monitor maximum transmission line loadings.

49. (a) Does HL&P/TU employ any different system design criteria for developing bulk transmission and generation than is required by TIS?
- (b) If so, please explain such different criteria.
50. (a) TU: describe in detail the assignment of Chas. T. Main, Inc. relating to a review of the PTI Study.
- (b) List the date of the assignment(s) with a brief description thereof.
- (c) List the professional and managerial personnel of TU and of Chas. T. Main, Inc. involved in the assignment(s).
- (d) Summarize the results and conclusions reached by Chas. T. Main, Inc.
- (e) Provide all documents which relate to this interrogatory.

Respectfully submitted,

  
Roy P. Lessy, Jr.  
Counsel for NRC Staff

  
Michael B. Blume  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 15th day of January 1979.

UNITED STATES OF AMERICA  
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CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF'S INITIAL INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO HOUSTON LIGHTING & POWER COMPANY AND TEXAS UTILITIES GENERATING COMPANY in the above captioned proceedings have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 15th day of January 1979.

Marshall E. Miller, Esq., Chairman  
Atomic Safety and Licensing Board  
Panel  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555 \*

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

Sheldon J. Wolfe, Esq.  
Atomic Safety and Licensing Board  
Panel  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555 \*

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

Docketing and Service Section  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555 \*

Donald A. Kaplan, Esq.  
Ray Phillips, Esq.  
John A. Whitler, Esq.  
Ronald H. Clark, Esq.  
Judith L. Harris, Esq.  
P. O. Box 14141  
Washington, D. C. 20044

Roff Hardy  
Chairman and Chief Executive  
Officer  
Central Power & Light Company  
Corpus Christi, Texas 78403

R. L. Hancock, Director  
City of Austin Electric Utility  
P. O. Box 1088  
Austin, Texas 78767

Robert E. Batken  
R. W. Beck & Associates  
P. O. Box 6817  
Orlando, Florida 32803

J. K. Spruce, General Manager  
City Public Service Board  
P. O. Box 1771  
San Antonio, Texas 78203

Marc R. Poirier  
Robert C. McDiarmid, Esq.  
Robert A. Jablon, Esq.  
David A. Giacalone, Esq.  
Spiegel & McDiarmid  
2600 Virginia Avenue, N. W.  
Washington, D. C. 20037

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

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

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

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

J. Gregory Copeland, Esq.  
Charles G. Thrash, Jr., Esq.  
E. William Barnett, Esq.  
Melbert D. Schwarz, Esq.  
Finis E. Cowan, Esq.  
Theodore F. Weiss, Esq.  
Baker & Botts  
3000 One Shell Plaza  
Houston, Texas 77002

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

Jerome Saltzman, Chief  
Antitrust & Indemnity Group  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555 \*

Jerry L. Harris  
Richard C. Balough  
Dan H. Davidson, City Manager  
City of Austin  
P. O. Box 1088  
Austin, Texas 78767

John E. Mathews, Jr., Esq.  
Mathews, Osborne, Ehrlich, McNatt,  
Gobelman & Cobb  
1500 American Heritage Life Building  
Jacksonville, Florida 32202

Tracy Danese, Esq.  
Vice President  
Florida Power & Light Company  
P. O. Box 013100  
Miami, Florida 33101

Jay Galt, Esq.  
Jack P. Fite, Esq.  
Looney, Nichols, Johnson & Hayes  
219 Couch Drive  
Oklahoma City, Oklahoma 73102

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

Nicholas S. Reynolds, Esq.  
Joseph B. Knotts, Esq.  
Debevoise & Liberman  
1200 Seventeenth St., N. W.  
Washington, D. C. 20036