

LAW OFFICES

LOWENSTEIN, NEWMAN, REIS, AXELRAD & TOLL

1025 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

202 862-8400

March 9, 1979

ROBERT LOWENSTEIN
JACK R. NEWMAN
HAROLD F. REIS
MAURICE AXELRAD
DAVID R. TOLL
KATHLEEN H. SHEA
J. A. BOURNIGHT, JR.

E. GREGORY BARNES
MICHAEL A. BAUSER
ALBERT V. CARR, JR.
ROBERT H. CULP
WILLIAM J. FRANKLIN
FREDERIC S. GRAY
JOEL S. WIGHT (ADM. CALIF.)

Sheldon J. Wolfe, Esq.
Chairman
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory
Commission
Washington, DC 20555

Mr. Gustave A. Linenberger
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory
Commission
Washington, DC 20555

Dr. E. Leonard Cheatum
Route 3, Box 350A
Watkinsville, Georgia 30677

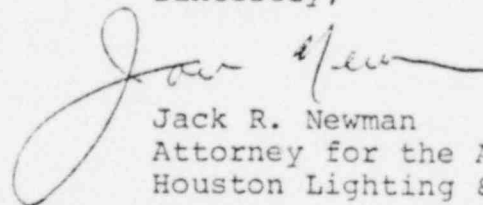
In the Matter of
Houston Lighting & Power Company
(Allens Creek Nuclear Generating Station, Unit 1)
Docket No. 50-466

Dear Members of the Board:

Counsel for the Applicant recently received the "NRC Staff's Response to Motion of J. H. Doherty for Admission of Several Contentions Previously Abandoned," etc. Analysis of the Staff's response in relation to Mr. Doherty's Contention 2 discloses apparently serious misapprehensions concerning the relevant factual situation and the nature of the "new information" involved.

Accordingly we request leave to file a brief reply to the Staff's response, and, in the event the Board grants permission, will do so promptly.

Sincerely,



Jack R. Newman
Attorney for the Applicant
Houston Lighting & Power Company

cc: See attached Certificate of Service

7904090284

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))
)
)

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached letter of this date to the members of the Atomic Safety and Licensing Board in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, properly stamped and addressed, this 9th day of March, 1979:

Sheldon J. Wolfe, Esq., Chairman
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Richard Lowerre, Esq.
Assistant Attorney General
for the State of Texas
P. O. Box 12548
Capitol Station
Austin, Texas 78711

Dr. E. Leonard Cheatum
Route 3, Box 350A
Watkinsville, Georgia 30677

Hon. Jerry Sliva
Mayor
City of Wallis, Texas 77485

Mr. Gustave A. Linenberger
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Hon. John R. Mikeska
County Judge, Austin County
P. O. Box 310
Bellville, Texas 77481

Chase R. Stephens
Docketing and Service Section
Office of the Secretary
of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

R. Gordon Gooch, Esq.
Baker & Botts
1701 Pennsylvania Avenue, NW
Washington, DC 20006

Steve Sohinki, Esq.
Staff Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Lois H. Anderson
3626 Boardmead
Houston, Texas 77025

Joe Archer, Esq.
Combs, Archer & Peterson
1220 Americana Building
811 Dallas Street
Houston, Texas 77002

Emanuel Baskir
5711 Warm Springs Road
Houston, Texas 77035

Patricia L. Day
2432 Nottingham
Houston, Texas 77005

Jean-Claude De Bremaecker
2128 Addison
Houston, Texas 77030

John F. Doherty
Armadillo Coalition of Texas
4438 1/2 Leeland
Houston, Texas 77023

Madeline Bass Framson
4822 Waynesboro Drive
Houston, Texas 77035

Robert S. Framson
4822 Waynesboro Drive
Houston, Texas 77035

Steven Gilbert, Esq.
122 Bluebonnet
Sugar Land, Texas 77478

Carro Hinderstein
8739 Link Terrace
Houston, Texas 77025

Atomic Safety and Licensing
Board Panel
U.S Nuclear Regulatory
Commission
Washington, DC 20555

Kathryn Hooker
1424 Kipling
Houston, Texas 77006

Gregory J. Kainer
11118 Wickwood
Houston, Texas 77024

Lee Loe
1844 Kipling
Houston, Texas 77098

D. Michael McCaughan
3131 Timmons Lane
Apartment 254
Houston, Texas 77027

Brenda McCorkle
6140 Darnell
Houston, Texas 77074

David Marke
Solar Dynamics, Ltd.
3904 Warehouse Row
Suite C
Austin, Texas 78704

D. Marrack
420 Mulberry Lane
Bellaire, Texas 77401

F. H. Potthoff, III
1814 Pine Village
Houston, Texas 77080

Wayne E. Rentfro
P. O. Box 1335
Rosenberg, Texas 77471

T. Paul Robbins
C/O AFSC
600 West 28th Street, #102
Austin, Texas 78705

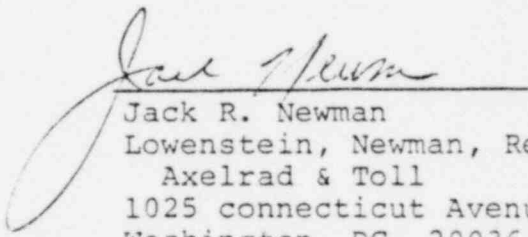
James Scott, Jr., Esq.
9302 Albacore
Houston, Texas 77074

Alan Vomacka, Esq.
Houston, Chapter, National
Lawyers Guild
4803 Montrose Boulevard
Suite 111
Houston, Texas 77006

Ann Wharton
1424 Kipling
Houston, Texas 77006

Joe Yelderman, MD
P. O. Box 303
Needville, Texas 77461

John R. Shreffler
5014 Braeburn
Bellaire, Texas 77401


Jack R. Newman
Lowenstein, Newman, Reis,
Axelrad & Toll
1025 Connecticut Avenue, N.W.
Washington, DC 20036