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#### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

HOUSTON LIGHTING & POWER COMPANY
PUBLIC SERVICE BOARD OF SAN ANTONIO
CITY OF AUSTIN
CENTRAL POWER AND LIGHT COMPANY
(South Texas Project, Unit Nos.
1 and 2)

TEXAS UTILITIES GENERATING COMPANY, et al. (Comanche Peak Steam Electric Station, Units 1 and 2)

NRC Docket Nos. 50-498A 50-499A

NRC Docket Nos. 50-445A 50-446A

MOTION OF THE NRC STAFF TO ANSWER
"HOUSTON LIGHTING & POWER COMPANY'S
OBJECTIONS AND MCTION FOR A PROTECTIVE
ORDER..."AND/OR FILE ITS OWN MOTION TO
COMPEL DISCOVERY BY MARCH 19, 1979

On February 22, 1979, the NRC Staff received "Houston Lighting & Power Company's Objections And Answers To The NRC Staff's Initial Interrogatories And Requests For Production Of Documents." On February 26, 1979, the Staff received in a separate pleading "Houston Lighting & Power Company's Objections And Motion For A Protective Order Regarding Discovery Request from NRC Staff." The Staff's response would to the aforementioned pleadings, together with any motions with respect thereto that the Staff may file would be due on March 12, 1979. However, on that date, the Staff's answers or objections to HL&P's second set of interrogatories are due. Moreover, in an effort to comply with the Board's discovery schedule, most Staff personnel involved in this matter will be in Texas for most of the week of March 12th, 1979.

Accordingly, the Staff hereby moves this Board for an order permitting it to answer HL&P's motion for a protective order as well as file a relevant motion to compel discovery by March 19, 1979. The Staff, on or before that date, will have delivered to local counsel as well as the Board the above described pleadings.

-2-

Counsel for HL&P has advised the Staff that there is no objection to this request.

Respectfully submitted,

Roy P. Lessy, Jr. Jr. Counsel for NRC Staff

Dated at Bethesda, Maryland this 7th day of March, 1979.

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### CERTIFICATE OF SERVICE

I hereby certify that copies of "MOTION OF THE NRC STAFF TO ANSWER "HOUSTON LIGHTING & POWER COMPANY'S OBJECTIONS AND MOTION FOR A PROTECTIVE ORDER..."AND/OR FILE ITS OWN MOTION TO COMPEL DISCOVERY BY MARCH 19, 1979", in the above-captioned proceeding, 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 7th day of March 1979.

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