

LAW OFFICES

LOWENSTEIN, NEWMAN, REIS, AXELRAD & TOLL

1025 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

202-862-8400

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

E. GREGORY BARNES
MICHAEL A. BAUSER
DEBORAH L. BERNSTEIN
ALBERT V. CARR, JR.
ROBERT H. CULP
PETER G. FLYNN
WILLIAM J. FRANKLIN
FREDERIC S. GRAY
DOUGLAS G. GREEN

February 6, 1980



Marshall E. Miller, Esquire
Michael L. Glaser, Esquire
Sheldon J. Wolfe, Esquire
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Houston Lighting and Power Company
South Texas Project, Units 1 and 2
(Docket Nos. 50-498A and 50-499A)

Gentlemen:

This is the January 1980 discovery report of
Houston Lighting & Power Company.

During the month of January, counsel for Houston
deposed the following individuals:

Gene R. Harrison	City of Hondo, Texas
Paul Hayers	Attorney for the City of Electra, Texas
Harold J. Marsh	Formerly with the City of Electra, Texas
Frank J. Meyer	Public Service Company of Oklahoma
John R. Milford	City of Seymour, Texas
Sam Phelps	City of Vernon, Texas
Ross Segrest	Brazos Electric Power Cooperative, Inc.

Houston's counsel also attended many of the depositions
noticed by the Department of Justice ("Department"),

8002190 270

M

Marshall E. Miller, Esquire
Michael L. Glaser, Esquire
Sheldon J. Wolfe, Esquire
February 6, 1980
Page Two

the NRC Staff ("Staff"), and the Public Utilities Board of Brownsville, Texas ("PUB").

The deposition of Alton Higginbotham of the Lighthouse Electric Cooperative, Inc. was cancelled based on the Department's representation that it does not presently intend to call Mr. Higginbotham as a witness. Also, the deposition of Douglas Wright was cancelled based on Mr. Wright's representations that he has not agreed to be a witness and that he knows nothing about this case. Houston reserves its right to depose these individuals should they subsequently be named as witnesses for any party.

Eleven additional depositions were noticed at the request of Houston. These are depositions of the various parties' testifying expert witnesses.

On January 2, 1980, Houston filed its Response to the Staff's Third Set of Interrogatories and Requests for Production of Documents. Houston received the Staff's Response to Houston's Third Set of Interrogatories and Requests for Production of Documents on January 23.

Houston served its Fourth Set of Interrogatories and Requests for Production of Documents to the Department on January 21, 1980.

The Central and South West Corporation ("CSW") filed a Second Request for Production of Documents Addressed to Houston which was received on January 28, 1980.

During January, Houston produced certain additional documents requested by the Staff and CSW, respectively. Houston also received documents produced by the Department and the PUB.

Respectfully submitted,

Peter G. Flynn

Peter G. Flynn
Attorney for Houston
Lighting and Power Company

Marshall E. Miller, Esquire
Michael L. Glaser, Esquire
Sheldon J. Wolfe, Esquire
February 6, 1980
Page Three

Of Counsel:

Baker and Botts
3000 One Shell Plaza
Houston, Texas 77002
713/229-1234

Lowenstein, Newman, Reis,
Axelrad & Toll
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036
202/862-8400

Dated: February 6, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing
January 1980 discovery report of Houston Lighting &
Power Company dated February 6, 1980 were served upon
the following persons, by hand *, or by deposit in the
United States Mail, first class postage prepaid, this
6th day of February, 1980.

Peter G. Flynn

Peter G. Flynn

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

Michael L. Glaser, Esquire
1150 17th Street, N.W.
Washington, D.C. 20555

Sheldon J. Wolfe, Esquire
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, Supervisor (20)
Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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

Jon C. Wood, Esquire
Matthews, Nowlin, Macfarlane
& Barrett
1500 Alamo National Building
San Antonio, Texas 78205

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

R. Gordon Gooch, Esquire
Steven R. Hunsicker, Esquire
Baker & Botts
1701 Pennsylvania Avenue
Washington, D.C. 20006

Roy P. Lessy, Jr., Esquire
Frederic D. Chanania, Esquire
Michael B. Blume, Esquire
Ann P. Hodgdon, Esquire
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Roff Hardy
Chairman and Chief Executive
Officer
Central Power and Light Company
Post Office Box 2121
Corpus Christi, Texas 78403

G.K. Spruce, General Manager
City Public Service Board
Post Office Box 1771
San Antonio, Texas 78203

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

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

R.L. Hancock, Director
City of Austin Electric Utility
Post Office Box 1086
Austin, Texas 78767

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

Michael I. Miller, Esquire
James A. Carney, Esquire
Sarah Welling, Esquire
Isham, Lincoln & Beale
One First National Plaza
Suite 4200
Chicago, Illinois 60603

David M. Stahl, Esquire
Isham, Lincoln & Beale
1050 17th Street, N.W.
Suite 701
Washington, D.C. 20036

Martha E. Gibbs, Esquire
Isham, Lincoln & Beale
One First National Plaza
Chicago, Illinois 60603

Don R. Butler, Esquire
Sneed, Vine, Wilkerson, Selman
& Perry
Post Office Box 1409
Austin, Texas 78768

Mr. William C. Price
Central Power & Light Company
P.O. Box 2121
Corpus Christi, Texas 78403

Mr. G. Holman King
West Texas Utilities Company
P.O. Box 841
Abilene, Texas 79604

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

Joseph B. Knotts, Jr., Esquire
Nicholas S. Reynolds, Esquire
Debevoise & Liberman
1200 17th Street, N.W.
Washington, D.C. 20036

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

Jay Galt, Esquire
Looney, Nichols, Johnson & Hays
219 Couch Drive
Oklahoma City, Oklahoma 73102

Knoland J. Plucknett
Executive Director
Committee on Power for the South-
west, Inc.
5541 East Skelly Drive
Tulsa, Oklahoma 74135

John W. Davidson, Esquire
Sawtell, Goode, Davidson & Tioill
1100 San Antonio Savings Building
San Antonio, Texas 78205

Douglas F. John, Esquire
Akin, Gump, Hauer & Feld
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036

David A. Dopsovic, Esquire
Frederick H. Parmenter, Esquire
Susan B. Cyphert, Esquire
Nancy A. Luque, Esquire
Energy Section Antitrust Division
U.S. Department of Justice
P.O. Box 14141
Washington, D.C. 20044

Morgan Hunter, Esquire
Bill D. St. Clair, Esquire
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, Esquire
Robert A. Jablon, Esquire
Marc R. Poirier, Esquire
Spiegel & McDiarmid
2600 Virginia Avenue, N.W.
Washington, D.C. 20037

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

William H. Burchette, Esquire
Frederick H. Ritts, Esquire
Law Offices of Northcutt Ely
Watergate 600 Building
Washington, D.C. 20036

Tom W. Gregg, Esquire
P.O. Box Drawer 1032
San Angelo, Texas 76902

Leland F. Leatherman, Esquire
McMath, Leatherman & Woods, P.A.
711 West Third Street
Little Rock, Arkansas 72201

Paul W. Eaton, Jr., Esquire
Hinkle, Cox, Eaton, Coffield & Hensley
600 Henkle Building
P.O. Box 10
Roswell, New Mexico 88201

Robert M. Rader, Esquire
Conner, Moore & Corber
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

W.N. Woolsey, Esquire
Kleberg, Dyer, Redford & Weil
1030 Petroleum Tower
Corpus Christ, Texas 78474

Donald M. Clements, Esquire
Gulf States Utilities Company
P.O. Box 2951
Beaumont, Texas 77704

Dick Terrell Brown, Esquire
800 Milam Building
San Antonio, Texas 78205

C. Dennis Ahearn, Esquire
Debevoise & Liberman
1200 Seventeenth Street, N.W.
Washington, D.C. 20036