

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. 50-498A
50-499A

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446

RESPONSE OF NRC STAFF TO FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS FROM HOUSTON
LIGHTING AND POWER COMPANY TO NRC STAFF

The NRC Staff hereby responds to the First Set of Requests for Production of Documents from Houston Lighting & Power Company ("HL&P"), dated February 1, 1980. The answers and information set forth herein are complete, based upon the NRC Staff's present belief and information, as of February 20, 1980. However, since documentary and testimonial discovery is ongoing, the NRC Staff may find it necessary to further update these responses prior to the commencement of hearing to include additional information, pursuant to 10 CFR § 2.740(e).

1. Produce all documents identified in any original or supplementary response to the Fourth Set of Interrogatories from Houston Lighting & Power Company to NRC Staff dated February 1, 1980.

Response: Responsive documents, or a listing thereof, have already been produced to HL&P. See also, Staff's Response to the Fourth Set of Interrogatories from HL&P to the NRC Staff, Nos. 1-8.

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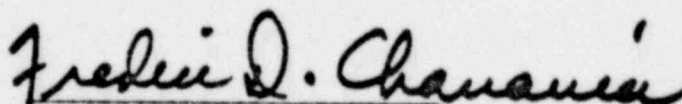
2. Produce all draft or proposed testimony, outlines, summaries of testimony questions and/or answers, or documents relating to testimony of N.C. Lerner.

Response: Responsive documents, or a listing thereof, have already been produced to HL&P. See also, Staff's Updated Response to HL&P's Second Set of Interrogatories and Request for Production of Documents; Staff's response to HL&P's Subpoena to Transcomm, Inc., dated February 25, 1980; Staff's Motion to Modify, dated February 25, 1980. Questions from Staff counsel are privileged, as held by the Board in its Order of June 25, 1979; see also Transcript of Proceedings, 1 June 1979, at p. 423.

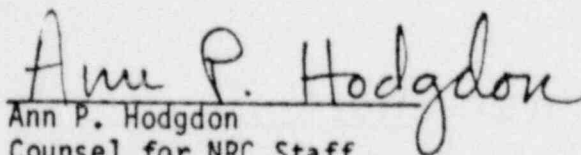
3. Produce all draft or proposed testimony, outlines, summaries of testimony, questions and/or answers, or documents relating to testimony of Robert Hartley.

Response: Responsive documents, or a listing thereof, have already been produced to HL&P. See also, Staff's Updated Response to HL&P's Second Set of Interrogatories and Requests for Production of Documents. Questions from Staff Counsel are privileged, as held by the Board in its Order of June 25, 1979; See also, Transcript of Proceedings, 1 June 1979, at p. 423.

Respectfully submitted,



Fredric D. Chanania
Counsel for NRC Staff



Ann P. Hodgdon
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 25th day of February, 1980.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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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))	

CERTIFICATE OF SERVICE

I hereby certify that copies of RESPONSE OF NRC STAFF TO FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS FROM HOUSTON LIGHTING AND POWER COMPANY TO NRC STAFF 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 25th day of February 1980:

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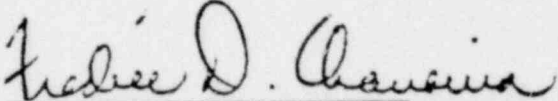
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