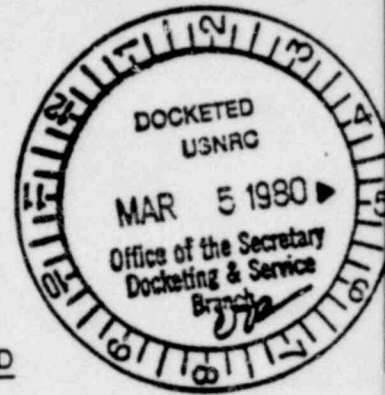


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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))

RESPONSE BY THE STATE OF TEXAS TO
THE FOURTH SET OF INTERROGATORIES FROM TexPIRG

The State of Texas now files its Response to the Fourth Set of Interrogatories from TexPIRG. While the State of Texas does not acknowledge the legal responsibility to respond to interrogatories since the State is participating as an interested state only, the State will attempt to assist any party to this proceeding by answering reasonable interrogatories relevant to the contention. After discussion with Mr. Johnson, an agreement was reached on the State of Texas' response to these interrogatories. The State agreed to provide, where possible, the name of the person in the relevant State agency who can provide the information requested.

RESPONSE TO INTERROGATORY NO. 1. See Attachment A. Further information on these matters can be obtained by contacting Michael George, Hearings Examiner, Gas Utilities

8004140281

Division, Railroad Commission, P. O. Drawer 12967, Austin, Texas 78711, (512) 445-1142.

RESPONSE TO INTERROGATORY NO. 2. The Railroad Commission has not estimated increased supplies of natural gas which will be made available to Texas firms because of the Natural Gas Policy Act. Gas will be made available through both existing and new contracts. Mel Waxler, at the Railroad Commission provided this response.

RESPONSE TO INTERROGATORY NO. 3. Yes, Bob Harris, Chief Engineer, Oil and Gas Division, can be contacted for this information--(512) 445-1307.

In addition, Dan Hardy at the Texas Energy and Natural Resources Advisory Council (TENRAC) has information related to this inquiry. He can be reached at (512) 475-5588. TENRAC's address is 800 Executive Office Building, 411 West 13th Street, Austin, Texas 78701.

RESPONSE TO INTERROGATORY NO. 4. Milton Lee, Deputy Director of Engineering and Enforcement, Public Utility Commission of Texas, can provide this information. His telephone number is (512) 458-0100.

In addition, Tony George with TENRAC--(512) 475-5588--has gathered this type of information.

RESPONSE TO INTERROGATORY NO. 5. Milton Lee can provide the information (see Response to Interrogatory No. 4 for his address and telephone number).

RESPONSE TO INTERROGATORY NO. 6. Studies were done by Radian Corporation to assess impact of air quality on fuel switching. These studies did not assess in detail the effects of the Industrial Fuel Use Act of 1978. The following documents, and others, can be obtained from the Public Information Office of the Texas Air Control Board, 6630 Hwy. 290 East, Austin, Texas 78723 - (512) 451-5711:

- Analysis of Policy Alternatives for the Control of SO₂ in the Houston Area; Prepared by Radian Corporation, Austin, Texas, July 20, 1979. Contract #230-373.
- Final Report of the SO₂ Air Quality for Harris, Fort Bend and Chambers Counties; Prepared by Radian Corporation, Austin, Texas, May 11, 1979. DC #79-230-373-03.

RESPONSE TO INTERROGATORY NO. 7. I am unable to find any state agency that has done such an analysis.

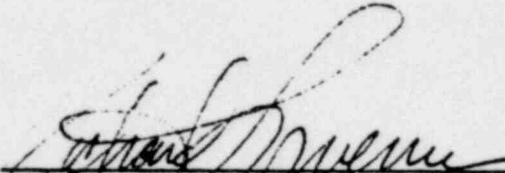
Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF,
THE STATE OF TEXAS

February 28, 1980.

The following outline was prepared in order to assist in answering the attached interrogatory.

I. Specific evidence, testimony, etc., presented in Docket No. 1055.

A. Transcript of Testimony from hearing held on March 15, 1979.

1. Testimony of Mr. Frank Youngblood (Representing Delhi Gas Pipeline Corporation)--Pp. 36 and 42-43.
2. Testimony of Mr. Danial B. Beeler (Representing Houston Pipeline Company)--Pp. 53 and 55-56.
3. Testimony of Mr. Houston Shirley (Representing Lo-Vaca Gathering Company)--Pp. 65-66.

B. Pre-filed testimony--especially the paper prepared and submitted by Dr. Hal B. H. Cooper, Jr.

II. Other testimony and evidence.

A. Docket No. 1858 (Intratex).

1. Transcript of Testimony from hearing held on December 21, 1978--especially the testimony of Mr. James V. Walzel--Pp. 25-67 and 117-182.
2. Supporting exhibits.

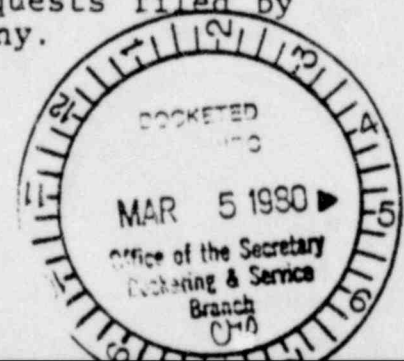
B. Docket No. 1864 (Delhi).

1. Transcript of Testimony from hearing held on December 12, 1978--especially the testimony of Mr. W. J. Murray, Jr.--Pp. 25-35.
2. Other pre-filed testimony and exhibits.

C. Testimony and exhibits in other recent § 312 cases.

1. Docket No. 1885.
2. Docket No. 1970.
3. Docket No. 1979.

D. Other cases, especially "new sales" requests filed by (or on behalf of) Lo-Vaca Gathering Company.



III. Copying Costs.

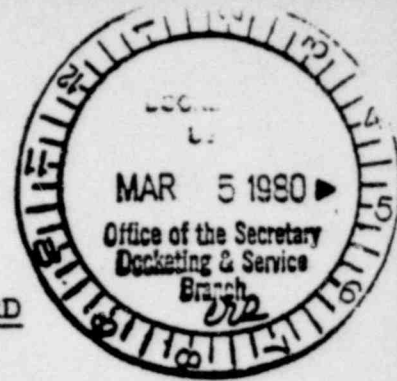
For copies made from each docket, the charge is 55¢ for the first page and 15¢ for each additional page.

IV. Person to contact at Railroad Commission.

Contact Mrs. Penny Howell at (512) 445-1141.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of)
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CERTIFICATE OF SERVICE

I hereby certify that copies of the "RESPONSE BY THE STATE OF TEXAS TO THE FOURTH SET OF INTERROGATORIES FROM TexPIRG in the above-captioned proceeding have been served on the following by deposit in the United States Mail, First Class, on this 28 day of February, 1980.

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Honorable John R. Mikeska
Austin County Judge
P. O. Box 310
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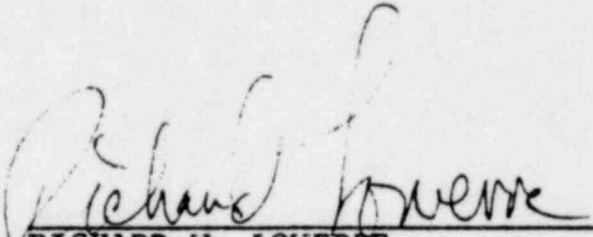
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