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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

HOUSTON LIGHTING &	:	Docket Nos. 50-498A
POWER COMPANY, ET AL	:	50-499A
	:	
(South Texas Project,	:	
Units 1 and 2)	:	
	:	
TEXAS UTILITIES	:	Docket Nos. 50-445A
GENERATING CO., ET AL	:	50-446A
	:	
(Comanche Peak System	:	
Electric Station,	:	
Units 1 and 2)	:	

CONSENT MOTION FOR ENLARGEMENT
OF TIME TO RESPOND TO HOUSTON
LIGHTING & POWER COMPANY'S MOTION
TO COMPEL PRODUCTION OF DOCUMENTS
FROM THE FILES OF THE
SOUTHWEST TEXAS ELECTRIC COOPERATIVE

Mr. Elton McGinnes and Southwest Texas Electric Cooperative respectfully request a two-week enlargement of time within which to respond to Houston Light & Power Company's Motion to compel Production of Documents from the files of the Southwest Texas Electric, and in support of their Motion state as follows:

Southwest Texas Electric Cooperative is not a party to either of the above-styled consolidated proceedings, and the issuance of a subpoena to a Mr. Elton McGinnes apparently stems

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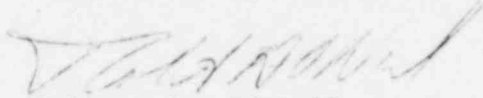
from the unilateral action of the Department of Justice in naming him as a "fact" witness for these proceedings. Although the Department of Justice designated Mr. McGinnes as a witness, it does not necessarily follow that the interests of the Department of Justice in these proceedings fully comport with the interests of Mr. McGinnes or Southwest Texas Electric Cooperative. Accordingly, Mr. McGinnes has sought the advice of private counsel concerning his rights and responsibilities in these proceedings.

The enlargement of time requested is to enable Mr. McGinnes' retained counsel to examine the pertinent files and documents in the case and to prepare a response to the Motion filed by Houston Lighting & Power.

Counsel for Mr. McGinnes is authorized to state that counsel for Houston Lighting & Power Company consents to the two-week enlargement of time requested.

WHEREFORE, for the foregoing reasons Mr. Elton McGinnes and Southwest Texas Electric Cooperative respectfully request a two-week enlargement of time within which to respond to the Motion to Compel Production of Documents filed by Houston Power & Lighting Company in the above-styled proceeding.

Respectfully submitted,



Robert A. O'Neil

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April 4, 1980