

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- <del>446A</del>
	)	
(Comanche Peak Steam Electric	)	
Station, Units 1 and 2)	)	

FOURTH SET OF INTERROGATORIES FROM  
HOUSTON LIGHTING & POWER COMPANY TO NRC STAFF

Preface

Pursuant to Sections 2.720, 2.740, and 2.790 of the Commission's Rules of Practice, Houston Lighting & Power Company propounds the following Interrogatories to the NRC Staff ("Staff"). Each Interrogatory should be answered separately and fully in writing under oath or affirmation by the person or persons making them no later than 14 days after service of these Interrogatories.

Definitions

As used herein the terms listed below are, unless otherwise specifically indicated, intended to have the following meanings:

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1. "First Set" refers to the First Set of Interrogatories and Requests for Production of Documents from Houston Lighting & Power Company to NRC Staff, dated October 17, 1978.

2. All Definitions of the First Set are incorporated in these Definitions by reference.

3. "This proceeding" means the above-captioned four Dockets.

#### General Instructions

The following General Instructions apply to each of the discovery requests contained herein:

1. Restate the interrogatory as the first part of the answer.

2. All General Instructions of the First Set are incorporated in these General Instructions by reference.

3. Exclude from your answer identification of all documents which the Staff has previously produced to Houston.

#### Interrogatories

1. Identify all documents which Transcomm Inc., Dr. N.C. Lerner, Rodney W. Frame, Antoinette Crowder, Kathy Rehbein, or any other Transcomm Inc. employee or consultant has provided to the Staff in connection with this proceeding. Identify documents in the possession or control of any entity or person named or described in this Interrogatory to which the Staff has or had access, whether or not any such document has ever been in the possession or control of the Staff.

2. Identify all documents which the Staff has provided to Transcomm Inc., Dr. N.C. Lerner, Rodney W. Frame, Antoinette Crowder, Kathy Rehbein, or any other Transcomm Inc. employee or consultant in connection with this proceeding. Identify documents in the possession or control of the Staff to which any entity or person named or described in this Interrogatory has or had access, whether or not any such document has ever been in the possession or control of such entity or person.

3. Identify all Requests for Proposals, proposals, bids, contracts, contract amendments, evaluations, and progress reports which relate to work performed or to be performed in connection with this proceeding by Transcomm Inc., Dr. N.C. Lerner, or any other employee of Transcomm Inc.

4. State the date of each oral communication between the Staff and its expert witness, Dr. N. C. Lerner or any person assisting him in connection with this proceeding, and for each such communication:

- (a) Identify each party thereto;
- (b) State the subject matter of the communication;
- (c) State what was said by each party; and
- (d) Identify all documents which set forth, contain information about, relate to or were discussed in the communication.

5. State the date of each oral communication between the Staff and its expert witness Robert Hartley or any person assisting him in connection with this proceeding, and for each such communication:

- (a) Identify each party thereto;
- (b) State the subject matter of the communication;
- (c) State what was said by each party; and
- (d) Identify all documents which set forth, contain information about, relate to or were discussed in the communication.

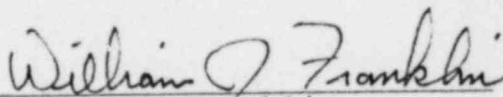
6. Identify all documents which contain information about, refer or relate to any of the following memoranda or the purpose for which they were prepared:

- (a) The Transcomm Memorandum to File from Rod Frame dated March 29, 1979, entitled "South Texas Antitrust Case";
- (b) The Memorandum to File from Rod Frame dated April 2, 1979, entitled "NRC-South Texas Proceeding";
- (c) The Memorandum to File from Rod Frame dated May 15, 1979, entitled "Lambe Memo of 4/6/79-NRC";
- (d) The NRC Memorandum to Norman Lerner, Transcomm, from William Lambe, NRR-AIG, dated April 6, 1979, entitled "Our recent discussions with Roy Lessy re: The South Texas case (Prepared in Anticipation of a Hearing)"; and
- (e) The Transcomm Memorandum to File from Rodney W. Frame dated June 26, 1979, entitled "Anti-competitive Effects of the Intrastate-only Restriction for Texas Electric Utilities".

7. Identify all documents which Robert Hartley or any person assisting him has provided to the Staff in connection with this proceeding. Identify documents in the possession or control of any person named or described in this Interrogatory to which the Staff has or had access, whether or not any such document has ever been in the possession or control of the Staff.

8. Identify all documents which the Staff has provided to Robert Hartley or any person assisting him in connection with this proceeding. Identify documents in the possession or control of the Staff to which any person named or described in this Interrogatory has or had access, whether or not any such document has ever been in the possession or control of such person.

Respectfully submitted,



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