

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
HOUSTON LIGHTING & POWER COMPANY,)	Docket Nos. 50-498A
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))	
)	

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

Pursuant to Sections 2.720, 2.740, 2.744 and 2.790 of the Commission's Rules of Practice, Houston Lighting & Power Company propounds the following Requests for Production of Documents to the NRC Staff ("Staff"). Each document requested should be produced no later than 30 days after service of these Interrogatories and Requests for Production.

Definitions

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

1. "First Set" refers to the First Set of Interrogatories and Requests for Production of Documents from Houston

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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" refers to any of the above-captioned dockets.

General Instructions

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

1. Documents in the possession of any other party to this proceeding or publicly available are not to be regarded as being in Houston's possession.

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

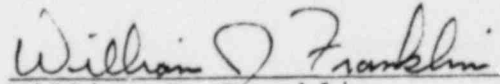
Requests for Production

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.

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

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

Respectfully submitted,



William J. Franklin
Attorney for Houston Lighting
& Power Company

OF COUNSEL:

Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

Lowenstein, Newman, Reis,
Axelrad & Toll
1025 Connecticut Avenue, NW
Washington, DC 20036

Dated: February 1, 1980