



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	§	
No. 1)	§	

SECOND SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
FROM HOUSTON LIGHTING & POWER COMPANY
TO D. MARRACK

Preface

Pursuant to Sections 2.740b and 2.741 of the Commission's Rules of Practice, Houston Lighting & Power Company propounds the following Interrogatories and Requests for Production of Documents to D. Marrack. Each interrogatory should be answered separately and fully in writing under oath or affirmation by the person or persons making them no later than fourteen (14) days after service of these Interrogatories and Requests for Production, and each document requested should be produced no later than thirty (30) days after service of these Interrogatories and Requests for Production.

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Interrogatories

1. List by title, date, author, publication, page and any other means of identification, every document that:

a. Supports your contention that neither the FES nor the FSFES addresses the impact upon migratory waterfowl along the transmission routes beyond the plant site, nor considers that this impact could be minimized by constructing the power lines to follow the Brazos River to the south of the site, then east and then north to the O'Brien substation; or

b. Supports the proposition that migratory waterfowl will or may strike the transmission line along Houston Lighting and Power Company's planned route from Allens Creek Nuclear Generating Station to the O'Brien substation.

As used in this interrogatory, the word "document" means and includes every writing or record of any type and description, including, but not limited to, correspondence, memoranda, stenographic or handwritten notes, drafts, studies, publications, invoices, ledgers, journals, books, records, accounts, pamphlets, voice recordings, reports, surveys, statistical compilations, work papers, data processing cards, computer tapes or printouts, or any other writing or recording of any kind.

2. List the name, address, telephone number, and technical qualifications of each person you have consulted in any way--whether successfully or unsuccessfully, and whether in person, by correspondence, by telephone, or by any other means--in conceiving, drafting, or otherwise preparing all or any part of your contention 2(c), or in requesting, obtaining, compiling, examining, studying, analyzing, or otherwise seeking or compiling evidence in support of all or any part of your contention 2(c).

3. List by title, date, publication, page, and any other means of identification every note, paper, document, article, book, or other writing or record, whether published or unpublished, written or prepared by you on the subject of migratory waterfowl or on the subject of electrical transmission lines or on both subjects.

Requests for Production of Documents

1. Produce and make available for copying every document listed in answer to Interrogatory No. 1(a) and 1(b), above.

2. Produce and make available for copying every note, piece of correspondence, and similar written or recorded information related to any consultation between you and any person listed in answer to Interrogatory No. 2, above and related in any way to the subject matter of your contention 2(c).

3. Produce and make available for copying every note, paper, document, article, book, or other writing or record listed in answer to Interrogatory No. 3, above.

Respectfully submitted,

Darrell Hancock

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UNITED STATES OF AMERICA
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing First Set of Interrogatories and Requests for Production of Documents from Houston Lighting & Power Company to D. Marrack in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 20th day of June, 1980.

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