

6/24/80



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) §

APPLICANT'S RESPONSE TO SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS FROM FINANCIAL QUALIFICATIONS INTERVENORS

In response to the Second Set of Interrogatories and Requests for Production of Documents from Financial Qualifications Intervenors propounded by Bryan Baker, Houston Lighting & Power Company (Applicant) answers as follows:

INTERROGATORY FQ-2.1:

a. Identify each witness, other than an expert witness, who Applicant may call in this proceeding, and provide a summary of the testimony which each such witness is expected to offer.

b. Identify all documents upon which each such witness may rely in any way, and provide copies of any such documents.

INTERROGATORY FQ-2.2:

a. Identify each expert witness who Applicant expects to call in this proceeding.

b. State the qualifications and credentials of each such expert witness.

c. Provide a summary of the testimony which each such witness is expected to offer.

d. State the factual basis for each conclusion or opinion each such witness expects to present or draw in such expert's testimony.

e. Identify all documents prepared by, for, or under the supervision of each such expert witness, or reviewed or relied upon by such expert in formulating the expert's opinions and conclusions, including workpapers, preliminary outlines and memoranda, and communications between such expert and Applicant. Provide copies of any such documents.

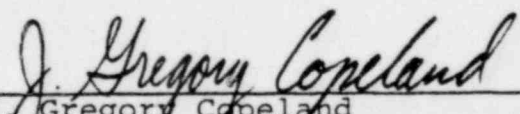
ANSWER:

Applicant anticipates that Mr. Hollis Dean will testify on the contentions relating to financial qualifications. Mr. Dean is the Chief Financial Officer of the Company with ultimate responsibility for the accounting, auditing, computer services and treasury departments of the Company. In his capacity, Mr. Dean is familiar with the financial integrity of the Company and he is expected to testify that the Company is financially qualified to construct the Allens Creek facility. At this time, Mr. Dean has not prepared his testimony nor has he identified any documents upon which he intends to rely for purposes of his testimony.

Respectfully submitted,

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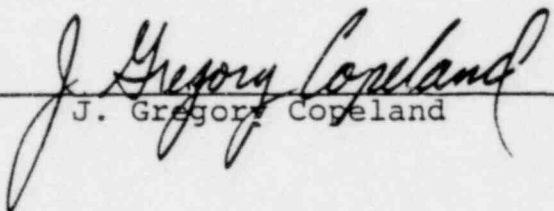
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