DOCKETED USNRC JUN 2 6 1980 Docketing & Service Branch

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOAPD

In the Matter of	§ 6
HOUSTON LIGHTING & POWER COMPANY	S 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,

OF COUNSEL:

BAKER & BOTTS 3000 One Shell Plaza Houston, Texas 77002 J. Gregory Copeland C. Thomas Biddle, Jr. Charles G. Thrash, Jr. 3000 One Shell Plaza Houston, Texas 77002 LOWENSTEIN, NEWMAN, REIS, Jack R. Newman AXELRAD & TOLL 1025 Connecticut Ave., N.W. Washington, D. C. 20036

Robert H. Culp 1025 Connecticut Ave., N.W. Washington, D. C. 20036

ATTORNEYS FOR APPLICANT HOUSTON LIGHTING & POWER COMPANY

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	5
HOUSTON LIGHTING & POWER COMPANY	S Docket No. 50-466
(Allens Creek Nuclear Generating	s
Station, Unit 1)	S

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to Second Set of Interrogatories and Requests for Production of Documents from Financial Qualifications Intervenors in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 24th day of 1980.

Sheldon J. Wolfe, Esq., Chairman Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Dr. E. Leonard Cheatum Route 3, Box 350A Watkinsville, Georgia 30677

Mr. Gustave A. Linenberger Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Mr. Chase R. Stephens
Docketing and Service Section
Office of the Secretary of the
Commission
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Richard Lowerre, Esq.
Assistant Attorney General
for the State of Texas
P. O. Box 12548
Capitol Station
Austin, Texas 78711

Hon. Charles J. Dusek Mayor, City of Wallis P. O. Box 312 Wallis, Texas 77485

Hon. Leroy H. Grebe County Judge, Austin County P. O. Box 99 Bellville, Texas 77418

Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D. C. 20555 Steve Sohinki, Esq.
Staff Counsel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Bryan L. Baker 1118 Montrose Houston, Texas 77019

Stephen A. Doggett, Esq. P. O. Box 592 Rosenberg, Texas 77471

Robert S. Framson Madeline Bass Framson 4822 Waynesboro Houston, Texas 77035

Mr. W. Matthew Perrenod 4070 Merrick Houston, Texas 77025

Mr. James M. Scott 13935 Ivy Mount Sugar Land, Texas 77478 Carro Hinderstein 609 Fannin, Suite 521 Houston, Texas 77002

D. Marrack 420 Mulberry Lane Bellaire, Texas 77401

Mr. J. Morgan Bishop 11418 Oak Spring Houston, Texas 77043

Mr. John F. Doherty 4327 Alconbury Houston, Texas 77021

Ms. Brenda McCorkle 6140 Darnell Houston, Texas 77074

Mr. Wayne E. Rentfro P. O. Box 1335 Rosenberg, Texas 77471

Mr. F. H. Potthoff 7200 Sb dy Villa, No. 110 Houston, Texas 77080