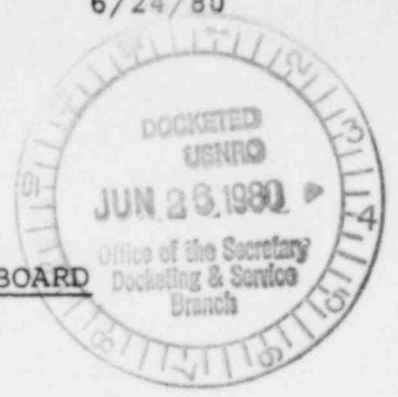


6/24/80

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of §  
§  
HOUSTON LIGHTING & POWER §  
COMPANY §  
§  
(Allens Creek Nuclear §  
Generating Station, Unit §  
No. 1) §

Docket No. 50-466

MOTION TO COMPEL ANSWERS  
TO INTERROGATORIES

Houston Lighting & Power Company hereby requests the issuance of an order compelling answers to its first set of interrogatories and requests for production of documents to F. H. Potthoff. Applicant's interrogatories and requests for production of documents were served on Mr. Potthoff on May 17, 1980. The answers were due on June 5, 1980. Mr. Potthoff neither answered the interrogatories nor objected to answering the interrogatories within the time required by the rules. Applicant respectfully requests the Board to issue an order compelling Mr. Potthoff to answer the interrogatories within ten (10) days.

These interrogatories requested Mr. Potthoff to identify any expert witnesses he intends to call at the proceeding and to identify any documents which will be relied

upon by the expert. Since discovery will terminate in this proceeding on July 9, 1980, Applicant must be notified very shortly as to any expert which Mr. Potthoff intends to call so that Applicant may take the expert's deposition within the time left for completion of discovery.

For the foregoing reasons, Applicant respectfully requests that the Board issue an order requiring Mr. Potthoff to answer Applicant's interrogatories.

Respectfully submitted,

*C. Thomas Biddle Jr*

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COMPANY

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of §  
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Generating Station, Unit §  
No. 1) §

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion to Compel Answers to Interrogatories 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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