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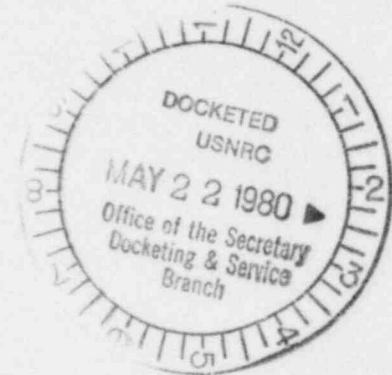
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May 20, 1980



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

Re: In the Matter of Houston Lighting & Power Company
(Allens Creek Nuclear Generating Station, Unit 1)
Docket No. 50-466

Dear Sir:

On April 29, 1980, Houston Lighting & Power Co. ("Applicant") moved this Atomic Safety and Licensing Board ("Board") for an order compelling Intervenor Carro Hinderstein and TexPirg to produce certain documents, workpapers, citations, and other materials produced by or relied upon by their common expert witness, Mr. Howard Saxion.

On May 15, 1980, some thirteen weeks after Mr. Saxion had first promised these materials, Intervenor belatedly produced a portion of the materials requested by Applicant. To the extent that these materials were actually provided, Applicant's motion is, therefore, moot.

Applicant requests, however, that the motion be granted for those items listed below, specifically requested by Applicant and not included among the materials produced on May 15. This list of materials not yet provided contains the same language used by Applicant to request these materials from Intervenor and the same language subsequently submitted to this Board in Applicant's Motion to Compel:

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Sheidon J. Wolfe, Esq.
May 20, 1980
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[1] Copies of any contracts, agreements, or written assignments between Mr. Saxion and Ms. Hinderstein or TexPirg.

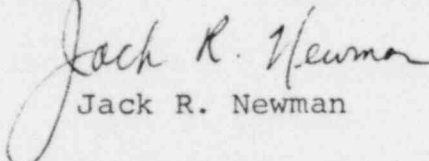
[2] A list of all projects in which Mr. Saxion has participated and in which research was conducted on the availability of water to municipalities or other clients who have employed Mr. Saxion or his firm. Specify those project reports that discuss the availability of water in the Brazos River Basin.

[3] Copies of all project reports listed in paragraph [2] above that discuss the availability of water in the Brazos River Basin, specifically including reports for the cities of McGregor and Cleburne.

Intervenors have neither responded to Applicant's request for these materials, nor sought a protective order pursuant to 10 C.F.R. § 2.740(c), as required by the Nuclear Regulatory Commission's Rules of Practice, 10 C.F.R. § 2.740(f)(1).

Applicant submits, therefore, that the Board should grant its April 29 Motion to Compel with respect to the materials specified above.

Very truly yours,


Jack R. Newman

JRN/fgr

cc: See attached Certificate of Service

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing letter to Sheldon J. Wolfe, Esq., in the above-captioned proceeding, were served on the following by deposit in the United States mail, postage pre-paid, or by hand delivery, this 20th day of May, 1980:

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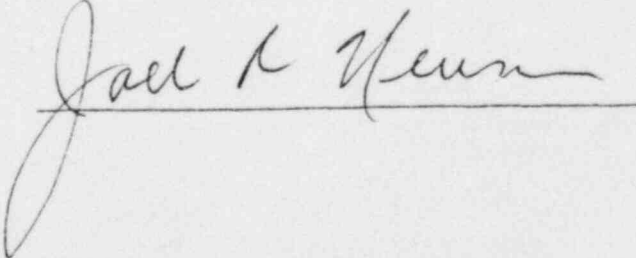
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A handwritten signature in cursive script, reading "Joel R. Yewer", is written over a horizontal line.