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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
HOUSTON LIGHTING & POWER COMPANY
Allen's Creek Nuclear Generating
Station, Unit 1

\$ Docket # 50-466

SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS FROM FINANCIAL QUALIFICATIONS INTERVENORS TO APPLICANT (FQ-2.)

- 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.
- 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 work papers, preliminary outlines and memoranda, and communications between such expert and Applicant. Provide copies of any such documents.

FOR THE FINANCIAL QUALIFICATIONS INTERVENORS,

Baker

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CURPIFICATE OF SERVICE

I hereby certify that copies of the preceding document were served on the following parties to the proceeding by deposit in the United States mail, First Class, on or before $J \circ N \in \mathcal{S}$, 1980.

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