



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of  
Houston Lighting and Power Company  
(Allens Creek Nuclear Generating  
Station, Unit No. 1)

July 5, 1980

Docket No. 50-466

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS FROM J. MORGAN BISHOP AND MARGARET BISHOP  
TO HOUSTON LIGHTING AND POWER ---- SAID INTERROGATORIES  
AND REQUESTS ARE TO PERTAIN TO ONLY THOSE CONTENTIONS  
FOR WHICH THE BISHOPS ARE LEAD PARTY FOR DISCOVERY.

Interrogatory No. 1a----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.

Interrogatory No. 1b----Identify all documents upon which each  
such witness may rely in any way, and provide copies  
of any such documents.

Interrogatory No. 2a----Identify each expert witness who  
Applicant expects to call in this proceeding.

Interrogatory No. 2b----State the qualifications and credentials  
of each such expert witness.

Interrogatory No. 2c----Provide a summary of the testimony  
which each such witness is expected to offer.

Interrogatory No. 2d----State the factual basis for each  
conclusion or opinion each such witness expects to  
present or draw in such expert's testimony.

Interrogatory No. 2e----Identify all documents prepared by, for,  
or under the supervision of each such expert witness,  
or reviewed or relied upon by such expert in form-  
ulating 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.

Respectfully Submitted,

*J. Morgan Bishop and Margaret Bishop*  
J. Morgan Bishop and Margaret Bishop

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