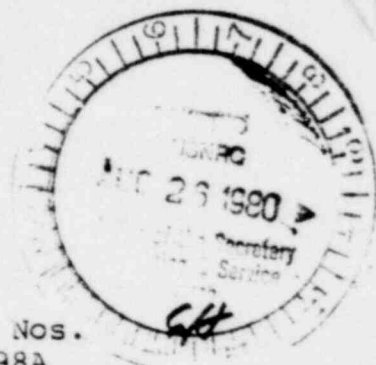


UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION



Houston Lighting & Power Company, et al.)	Docket Nos.
(South Texas Project, Units 1 & 2),)	50-498A
)	50-499A
)	
Texas Utilities Generating Company, et al.)	Docket Nos.
(Comanche Peak Steam Electric Station,)	50-445A
Units 1 & 2))	50-446A

WRITTEN INTERROGATORIES AND DOCUMENT REQUESTS
ADDRESSED TO CENTRAL POWER & LIGHT COMPANY
BY THE PUBLIC UTILITIES BOARD
OF THE CITY OF BROWNSVILLE, TEXAS

The Public Utilities Board of the City of
Brownsville, Texas hereby submits written interrogatories and
document requests to Central Power & Light Company.
Instructions are set out following the interrogatories and
document requests.

Interrogatories and Document Requests

1. Please state as to each of the following persons whether he engaged in any communication with any official, employee, agent, consultant or attorney of the Public Utilities Board of Brownsville, Texas, or of the City of Brownsville, Texas, other than Robert Roundtree, Larry Gawlik, R. Michael Simmons, members of Spiegel & McDiarmid, members of Sawtelle, Goode, Davidson & Troilo or R.W. Beck and Associates:

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- (a) Mr. William B. Sayles, Chairman of the Board and Chief Executive Officer of Central Power & Light Company ("CP&L"), since March 1, 1980, formerly Chairman of the Board and Chief Executive Officer of West Texas Utilities Company ("WTU");
- (b) Mr. Merle Borchelt, Executive Vice President of CP&L;
- (c) Mr. William C. Price, Vice President of CP&L;
- (d) Mr. Tyler Russell, District Manager, Valley District, CP&L;
- (e) Mr. Durward Chalker, Chairman of the Board and Chief Executive Officer, Central & South West Corporation ("C&SW").

2. As to each such person to which the answer to Interrogatory No. 1 is affirmative, please identify each such oral communication and each such documentary communication.

3. As to each person listed in Interrogatory No. 1, identify all communications with any person, either within or outside the Company, which oral or documentary communication dealt in any way with any or each of the following subject matters:

- (a) Possible purchase or lease of part or all of the City's electric utility system by CP&L, C&SW or any affiliate or subsidiary thereof, or by any other entity;
- (b) any actual or potential study made or to be made concerning the Public Utilities Board, including any study as to any aspect of the City's electric, water and sewer facilities or operations;
- (c) the issuance of bonds by the City, the proceeds of which might be used in whole or in part by the City's Public Utilities Board, including any communication relating to terms, conditions, rate, timing, underwriting, sale, or use of proceeds.

4. As to each person listed in Interrogatory No. 1, state whether he has any knowledge of any communication on the subject matter specified in Interrogatory No. 3, engaged in by any officer, employee, agent, consultant or attorney for the Company, with anyone, either within or outside the Company, and identify each such oral or documentary communication.

5. Please provide a copy of all documents related to each communication identified pursuant to any of the above interrogatories.

Instructions

A. Each person supplying information in response to interrogatories should respond separately and fully under oath or affirmation. The person or persons responsible for assuring the completeness of the responses should also supply an oath or affirmation to that effect unless that person is an attorney, in which case the person should state.

B. Each document produced in response to this request should be referenced with the number(s) of the relevant request and subsection, if any. Should any of the documents requested pursuant to this set of interrogatories and requests for document production have already been made available for Brownsville's inspection, it will be sufficient to note this fact and to provide the following information: (1) document production number, if any; (2) date, author, addressee (if any), persons receiving distribution of such document or copies thereof; (3) a description of the nature of the document or copies thereof; (3) a description of the nature of the document; and (4) the particular request and item number in response to which the document has previously been produced.

C. Responses to interrogatories and requests for the production of documents shall be served upon the following persons:

George Spiegel, Esquire
Marc R. Poirier, Esquire
Spiegel & McDiarmid
2600 Virginia Avenue, N.W.
Washington, D.C. 20037

D. Please respond to interrogatories and document requests within 14 days.

E. These interrogatories and requests for documents are of a continuing nature and require supplemental answers should CP&L, C&SW, or any subsidiary or affiliate, generate or obtain further pertinent information or documents between the time answers are filed and its documents produced and the time of the evidentiary hearing.

F. If any document otherwise responsive to any request was, on or after December 19, 1970 (date of enactment of P.L. 91-560), but is no longer in the possession, or subject to the control of the Company, or in existence, state whether (1) it is missing or lost, (2) has been destroyed, (3) has been transferred voluntarily to others, or (4) has been otherwise disposed of. In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing its destruction or

transfer, and the date(s) of such direction or authorization. Identify each such document by listing its author and addressee, type (e.g., letter, memorandum, telegram, chart, photograph, etc.), date, subject matter, whether the document (or copies) are still in existence, and if so, their present location(s) and custodian(s).

G. The period covered by these interrogatories is from July 1, 1979 to the present.

H. If any documents within any description set out above are withheld by reason of any assertion of privilege, identify each such document by date, description, and type, identify all persons preparing and/or receiving each document, and state the privilege asserted, and the detailed reasons that, in opinion of the Company, justify the assertion of privilege as to each document.

I. Definitions are as follows:

1. "Documents" shall mean all writings and records of every type in the actual or constructive possession, control, or custody of the Company,

or any of its directors, officers, employees, consultants, or agents, including but not limited to contracts, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, computer printouts, vouchers, accounting statements, telegrams and telegraphic communications, engineering diagrams (including "one-line diagrams"), mechanical and electrical recordings, records of telephone communications, speeches and all other records, written, electrical, mechanical, or otherwise.

"Documents" shall also mean copies of documents, even though the originals thereof are not in its possession, custody, or control, and every copy of a document which contains handwritten or other notations, or which in any other manner does not duplicate the original, or any other copy furnished pursuant to this request.

2. "Communications" shall include, without limiting the generality of its meaning, all conversations between two or more persons either in person

or by telephone, all statements, speeches, declarations and comments, and shall include documents as defined in I.1. above.

3. "Person" shall mean any natural person, company, association, firm, corporation, cooperative, rural electric cooperative, municipality, joint stock association, or any political subdivision, agency or instrumentality of the federal, state, or municipal governments, or a lawful association of any of the foregoing, or any entity that produces, generates, transmits, distributes, purchases, sells, or furnishes electricity.

4. "Company" means C&SW, CP&L, WTU, Public Service Company of Oklahoma, Southwestern Electric Power Company, and any other affiliates or subsidiaries of any of the foregoing.

5. "Identify," when used with respect to oral communications, means that the type of communication, maker of the communication, persons communicated to, persons for whom the communication was intended, date, location, subject, and what was

said as specifically as can be recalled of the communication should be specified. All persons present at or aware of the communication, and their position and employer, should be specified.

"Identify" when used with respect to documentary communications means that a copy of the document should be furnished, together with all documents referred to therein, and all documents in the possession of the Company utilized or considered or prepared in connection with the documentary communication, or otherwise related to the documentary communication.

6. "Relating to", "relate to", and "related to" mean consisting of, referring to, reflecting, or being in any way legally, logically or factually connected with. Requests "relating to" a subject or item should be understood to include possible or contemplated actions as to such subject or item. For example, a request for documents relating to interconnection plans would include documents relating to interconnection arrangements that have been considered but rejected.

7. "City of Brownsville, Texas" in the context "Official, employee, agent or consultant, or attorney of the City of Brownsville, Texas" shall include without limitation all branches, divisions, and departments of the municipal government, including the Public Utilities Board.

8. "Including" shall mean including but not limited to.

8. "Or" shall have its inclusive meaning; thus "a communication relating to A or B" shall mean relating to A or B or both A and B.

Respectfully submitted,

George Spiegel by ID

George Spiegel

Marc Poirier

Marc R. Poirier
Attorneys for the Public
Utilities Board of the
City of Brownsville, Texas

Law Offices Of:

SPIEGEL & MCDIARMID
2600 Virginia Avenue, N.W.
Suite 312
Washington, D.C. 20037

August 25, 1980

UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY LICENSING BOARD



In the Matter of)
)
HOUSTON LIGHTING & POWER COMPANY,) Docket Nos. 50 JA
et al.) and 50-499A
)
(South Texas Project, Unit Nos.)
1 and 2)
)
_____)
)
In the Matter of)
)
TEXAS UTILITIES GENERATING COMPANY,) Docket Nos. 50-445A
et al.) and 50-446A
)
(Comanche Peak Steam Electric)
Station, Unit Nos. 1 and 2)
)
)

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing WRITTEN INTERROGATORIES AND DOCUMENT REQUESTS ADDRESSED TO CENTRAL POWER & LIGHT COMPANY BY THE PUBLIC UTILITIES BOARD OF THE CITY OF BROWNSVILLE, TEXAS to be served on the following by deposit in the United States mail, first class, or as indicated by asterisk (*) by hand, first class, postage paid, this 25th day of August, 1980.

- | | |
|---|---|
| *Marshall E. Miller, Chairman
Atomic Safety & Licensing Board
Panel
Nuclear Regulatory Commission
Washington, D. C. 20555 | *Sheldon J. Wolfe, Esquire
Atomic Safety & Licensing Board
Panel
Nuclear Regulatory Commission
Washington, D. C. 20555 |
| *Michael L. Glaser, Esquire
1150 17th Street, N. W.
Washington, D. C. 20036 | Joseph Rutberg, Esquire
Antitrust Counsel
Nuclear Regulatory Commission
Washington, D. C. 20555 |
| *Fredric D. Chanania, Esq.
Michael B. Blume, Esq.
Ann Hodgdon, Esq.
Nuclear Regulatory Commission
Washington, D. C. 20555 | *R. Gordon Gooch, Esquire
John P. Mathis, Esquire
Baker & Botts
1701 Pennsylvania Avenue, N. W.
Washington, D. C. 20006 |

Jerome Saltzman, Chief
Antitrust & Indemnity Group
Nuclear Regulatory Commission
Washington, D. C. 20555

Chase R. Stephens, Chief
Docketing & Service Section
Office of the Secretary
Nuclear Regulatory Commission
Washington, D. C. 20555

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Suite 325
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*Robert Fabrikant, Esquire
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Department of Justice
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Washington, D.C. 20444

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Nicholas S. Reynolds, Esquire
Devevoise & Liberman
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Washington, D.C. 20005

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Gaffney, South Carolina 29340

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800 Milam Building
San Antonio, Texas 78205

*Robert Lowenstein, Esquire
J. A. Bouknight, Jr., Esquire
William J. Franklin, Esquire
Lowenstein, Newman, Reis,
Axelrad & Toll
1025 Connecticut Avenue, N. W.
Washington, D. C. 20036

*Frederick H. Ritts, Esquire
Law Offices of Northcutt Ely
Watergate 600 Building
Washington, D. C. 20037

*Wheatley & Wolleson
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Washington, D. C. 20037

William Sayles, Chairman and
Chief Executive Officer
Central Power & Light Company
P. O. Box 2121
Corpus Christi, Texas 78403

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San Antonio, Texas 78201

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W. Roger Wilson, Esquire
Matthews, Nowlin, Macfarlane
& Barrett
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San Antonio, Texas 78205

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Texas Utilities Generating Co.
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Dallas, Texas 75201

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Merlyn D. Sampels, Esquire
Spencer C. Relyea, Esquire
Worsham, Forsythe & Sampels
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Dallas, Texas 75201

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Department
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Austin, Texas 78767

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Richard C. Balough, Esquire
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Austin, Texas 78767

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City Manager
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Capital Station
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Hinkle, Cox, Eaton, Coffield
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Roswell, New Mexico 88201

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Executive Vice President
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P. O. Box 1700
Houston, Texas 77001

W. S. Robson, General Manager
South Texas Electric Coop., Inc.
P. O. Box 151
Nursery, Texas 77976

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Isham, Lincoln & Beale
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Chicago, Illinois 60603

Donald Clements, Esquire
Gulf States Utilities Co.
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Beaumont, Texas 77074

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Executive Director
Committee on Power for the
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Tulsa, Oklahoma 74135

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Looney, Nichols, Johnson & Hayes
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& Knapp
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Washington, D.C. 20006

Leland F. Leatherman, Esq.
McMath, Leatherman and Woods, P.A.
711 West Third Street
Little Rock, Arkansas 72201

Somervell County Public Library
P. O. Box 417
Glen Rose, Texas 76403

Maynard Human, General Manager
Western Farmers Electric Coop.
P. O. Box 429
Anadarko, Oklahoma 73005

James E. Monahan
Executive Vice President
and General Manager
Brazos Electric Power Coop., Inc.
P. O. Box 6296
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Dyer and Redford
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Corpus Christi, Texas 78474

Mr. G. Holman King
West Texas Utilities Co.
P. O. Box 841
Abilene, Texas 79604

Maurice V. Brooks, Esq.
Brooks, Gordon, Long & Shahan
P. O. Box 118
Abilene, Texas 79604

Marc Poirier

Marc R. Poirier
Attorney for the Public Utilities
Board of the City of Brownsville,
Texas

August 25, 1980

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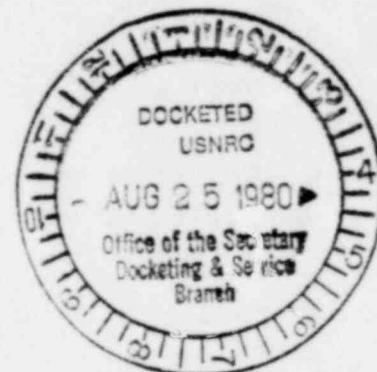
GEORGE SPIEGEL, PC
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August 25, 1980

OF COUNSEL
LLOYD E. DIETRICH

David M. Stahl, Esquire
Isnam, Lincoln & Beale
Suite 325
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036



Re: Houston Lighting & Power Co., et al.,
(South Texas Project, Units 1 & 2),
NRC Docket Nos. 50-498A, 50-499A

Dear Dave:

Enclosed please find a copy of "written Interrogatories and Document Requests addressed to Central Power & Light Company by the Public Utilities Board of the City of Brownsville, Texas." These interrogatories are in the nature of a request for the supplemental information that Central Power & Light Company is obligated to provide with regard to certain narrowly defined areas in the "Corrected Initial Interrogatories to and first Request for Production of Documents by Central Power & Light Company from the Public Utilities Board of the City of Brownsville, Texas," filed January 5, 1979. The time frame of the enclosed interrogatories is also limited, from July 1, 1979 to the present.

In view of the impending pre-hearing procedural schedule, please supply all responses and documents within fourteen days at the latest.

Very truly yours,

Marc Poirier

Marc R. Poirier
Attorney for the Public
Utilities Board of the City of
Brownsville, Texas

Enclosure

cc: All Parties

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