

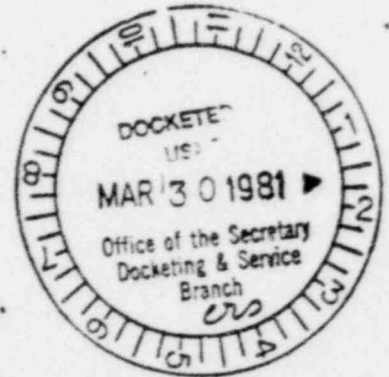
2-27-81

EXHIBIT 1

CHARLES BECHHOFFER, CHAIRMAN
ATOMIC SAFETY AND LICENSING BOARD
U. S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DR. EMMETH A. LUEBKE
ATOMIC SAFETY AND LICENSING BOARD
U. S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DR. JAMES C. LAMB III
ADMINISTRATIVE JUDGE
313 WOODHAVEN ROAD
CHAPEL HILL, NC 27514



IN THE MATTER OF
HOUSTON LIGHTING AND POWER COMPANY, ET AL.
(SOUTH TEXAS PROJECT, UNITS 1 AND 2)
DOCKET NOS. 50-498, 50-499

DEAR MEMBERS OF THE BOARD:

SINCE THE PREHEARING CONFERENCE OF NOVEMBER 17, 1980, MRS. BUCHORN, EXECUTIVE DIRECTOR OF CITIZENS FOR EQUITABLE UTILITIES, INC., HAS BEEN HOSPITALIZED FOR MORE THAN THIRTY DAYS, WITH MAJOR SURGERY BEING PERFORMED ON JANUARY 8, 1981, UNEXPECTED POST-OPERATIVE PROBLEMS HAVE PREVENTED A RETURN, FULL TIME, TO THE C.E.U. OFFICES UNTIL FEBRUARY 20TH.

THEREFORE WE FIND IT NECESSARY TO REQUEST THAT THIS BOARD CONSIDER AN ALTERATION OF THE SCHEDULE PREVIOUSLY SET OUT IN THE BOARD ORDER OF DECEMBER 2, 1980.

WE FEEL THAT THIS WOULD NOT UNDOULY DELAY THE PROCEEDINGS. AS MR. TODESTO POINTED OUT IN HIS MEMORANDUM OF JANUARY 26, 1981 TO MR. CHRISTENBURY, A STAFF VISIT TO H. L. & P. AND THE S. T. P. SITE ORIGINALLY PLANNED FOR DECEMBER OR EARLY JANUARY HAD TO BE DELAYED UNTIL THE THIRD WEEK IN FEBRUARY. THIS HAS RESULTED IN THE SAFETY EVALUATION REPORT POSSIBLY NOT BEING COMPLETED UNTIL SOMETIME IN APRIL.

C. E. U. RESPECTFULLY REQUESTS THAT THE BOARD CONSIDER THE PROPOSED SCHEDULE SET OUT IN ATTACHMENT I. MRS. BUCHORN DOES PLAN TO ATTEND THE PREHEARING CONFERENCE PLANNED FOR MARCH 17 - 18 IN AUSTIN, TEXAS, AND WILL BE PREPARED TO DISCUSS THIS REQUEST AT THAT TIME.

RESPECTFULLY SUBMITTED

Mrs. Peggy Buchorn

MRS. PEGGY BUCHORN, EXEC. DIR.

ATTACHMENT
AS STATED

COPIES:
Service Unit.

POOR ORIGINAL

8104020561

EXHIBIT 2

MEDICAL HISTORY OF MRS. PEGGY BUCHORN
SINCE NOVEMBER 19, 1980 PREHEARING CONFERENCE

11-19-80	Prehearing Conference - Houston, Texas
11-20-80	Senate Hearing - Austin, Texas
11-21-80	Too ill to drive from Austin, Texas to home in
to	Brazoria, Texas
11-22-80	
11-25-80	Dr. Stewart - stress test
11-26-80	Test sent to heart specialist - Dr. Turner
11-29-80	Test reported marginal
12-6-80	Emergency Room - Community Hospital
12-15-80	Cardiac Stress Test - Dr. Turner
12-16-80	Contacted by Dr. Stewart - told had failed stress test
12-17-80	Entered Methodist Hospital, Houston, Texas
12-18-80	Cardiac Cath., Angiogram, Anterogram Coronary
12-22-80	E.M.G. - Nerve conduction study
12-24-80	Allowed to go home for Christmas
12-28-80	Return to Methodist Hospital
12-29-80	Myelogram (25th Wedding Anniversary)
12-29-80	Traction
thru	
1-8-80	
1-8-80	Neuro-spinal surgery
1-17-80	Dismissed from Methodist Hospital
1-17-80	Restricted activity
thru	
2-25-80	
2-25-80	Returned to office on full time basis

EXHIBIT 3

AFFIDAVIT OF MS. PEGGY BUCHORN

"I, Peggy Buchorn, do swear the following to be true:

My name is Peggy Buchorn. I am Executive Director of Citizens for Equitable Utilities (C.E.U.). On Jan. 6, 1979, C.E.U. members contacted me during a C.E.U. press conference in Austin. The members enumerated certain concerns about the South Texas Project and asked me to investigate with a view toward intervening in the operating licensing proceeding. C.E.U. has represented numerous persons from the immediate area of the plant for several years (since 1976) and continues to represent them. These persons have no expertise in regulatory proceedings and have relied upon me to represent them. I have no staff and am myself unpaid. During my November, 1980 through February 1981 illness, there was no member of my organization capable of carrying out my responsibilities."

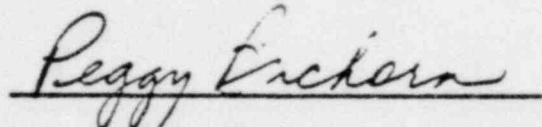

Peggy Buchorn

EXHIBIT 4

CHARLES BECHHOEFFER, CHAIRMAN
DR. EMMETH A. LUEBKE
DR. JAMES C. LAMB, ADMINISTRATIVE JUDGE
ATOMIC SAFETY AND LICENSING BOARD
U.S. NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
HOUSTON LIGHTING AND POWER COMPANY, ET AL.
(SOUTH TEXAS PROJECT UNITS 1 AND 2)
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GENTLEMEN,

DUE TO EXTENUATING CIRCUMSTANCES, LEGAL COUNSEL PREVIOUSLY RETAINED BY CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. HAS WITHDRAWN FROM THIS PROCEEDING. BETTY WHEELER, PRINCIPAL ATTORNEY FOR THE HEARING, HAS BEEN ILL FOR A PERIOD OF OVER THIRTY DAYS, AND HAS SEVERAL OTHER MAJOR CASES EXPECTED TO CLIMAX DURING APPROXIMATELY THE SAME PERIOD AS THE EARLY EVIDENTIARY HEARING.

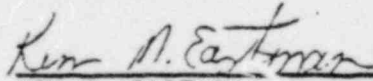
SINCE THE TIME THAT MS. WHEELER WAS RETAINED BY CCANP, OFFICERS OF CCANP HAVE NOT CORRESPONDED WITH OTHER PARTIES TO THIS PROCEEDING; THIS BEING AN EFFORT TO MAXIMIZE CLARITY OF THE SITUATION AND TO MINIMIZE CONFUSION ON THE PART OF ALL PARTIES. THEREFORE, CERTAIN MATTERS WHICH SHOULD HAVE BEEN PURSUED OVER THE LAST FEW MONTHS, INCLUDING CORRESPONDENCE WITH OTHER PARTIES TO THIS PROCEEDING, WERE NOT ACTED UPON.

WITH THE CIRCUMSTANCES AS SET OUT ABOVE, CCANP FINDS IT NECESSARY TO REQUEST THAT THE BOARD REVISE THE SCHEDULE PREVIOUSLY OUTLINED IN ITS ORDER OF DECEMBER 2, 1980.

CCANP HAS REVIEWED THE PROPOSED AGENDA SUBMITTED TO THE BOARD BY CITIZENS FOR EQUITABLE UTILITIES, INC. AND WE BELIEVE THIS SCHEDULE WOULD ADEQUATELY SATISFY OUR NEEDS. FURTHERMORE, WE BELIEVE THIS SCHEDULE WOULD ELIMINATE THE NECESSITY OF A BIFURCATED HEARING, WHICH WOULD OTHERWISE BE NECESSARY DUE TO THE DELAY IN THE ISSUANCE OF THE SER.

CCANP THEREFORE RESPECTFULLY REQUESTS THAT THE BOARD CONSIDER ADOPTING THE AGENDA OUTLINED BY CEU IN ITS LETTER OF FEBRUARY 27, 1981.

RESPECTFULLY SUBMITTED
THIS 9th DAY OF MARCH, 1981


KIM M. EASTMAN

CC: SERVICE LIST

DUPE OF
8103200752