

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD DEC 22 11:35

In the Matter of	)	
	)	
HOUSTON LIGHTING AND POWER	)	Docket Nos. 50-498 OL
COMPANY, <u>ET AL.</u>	)	50-499 OL
	)	
(South Texas Project,	)	
Units 1 and 2)	)	December 21, 1981

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

APPLICANTS' FOURTH SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO CEU

Pursuant to the Licensing Board's Fourth Prehearing Conference Order and Sections 2.740b and 2.741 of the Nuclear Regulatory Commission's Rules of Practice, Applicants propound the following Interrogatories and Requests for Production of Documents to Citizens for Equitable Utilities (hereinafter "CEU"). Applicants incorporate herein the instructions and definitions set forth in their First Set of Interrogatories and Requests for Production of Documents to CEU.

These Interrogatories and Requests for Production of Documents seek information related to contentions 1.8(a-d), concerning I&E Report 81-28, as admitted into controversy by the Fourth Prehearing Conference Order. Contentions 1.8(a-d) were identified as contentions 23, 24, 25 and 26 in Citizens Concerned About Nuclear Power Motion to File Additional Contentions Based on New Information and to Establish A Discovery and Hearing Schedule with Respect to New Contentions.

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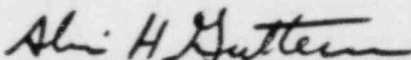
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Interrogatories and Requests for Production  
of Documents

(1) Identify each of the documents, including but not limited to tape recordings, and other sources of information (other than I&E Report 81-28) upon which CEU relies for support of contentions 1.8(a-d) or which constitute a source of information for CEU concerning such contentions.

(2) Produce for inspection and copying each document identified in the response to Interrogatory 1.

Respectfully submitted,



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Dated: December 21, 1981

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& POWER COMPANY, Project Manager  
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acting herein on behalf of itself  
and the other Applicants, THE  
CITY OF SAN ANTONIO, TEXAS,  
acting by and through the City  
Public Service Board of the City  
of San Antonio, CENTRAL POWER  
AND LIGHT COMPANY and CITY OF  
AUSTIN, TEXAS

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CERTIFICATE OF SERVICE

I hereby certify that copies of Applicants' Fourth Set of Interrogatories and Requests for Production of Documents to CEU have been served on the following individuals and entities by deposit in the United States mail, first class, postage prepaid, or as indicated by footnote, on this 21st day of December, 1981.

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