

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE ADMINISTRATIVE LAW JUDGE LAURENSEN

DOCKETED
MAY 4 1982
P3:55

In the Matter of:

HOUSTON LIGHTING AND POWER CO.,
et al.

(South Texas Project, Units
1 and 2)

TEXAS UTILITIES GENERATING
COMPANY, et al.

(Comanche Peak Steam Electric
Station, Units 1 and 2)



Docket Nos. 50-498A
50-499A

Docket Nos. 50-445A
50-446A

TUGCO'S RESPONSE TO BROWNSVILLE'S
ANSWERS TO JUDGE'S QUESTIONS

On April 19, 1982, the Public Utilities Board of Browns-
ville ("PUB") submitted negative answers to the first two of
the four questions which had been posed at the April 13, 1982
Conference of Counsel ^{1/} in these proceedings; Counsel for PUB
characterized the remaining two questions as not applicable in
view of the negative response to the first two questions. In
its capacity as an intervenor in the South Texas proceeding,
TUGCO submits this response as invited by the Administrative Law
Judge. ^{2/}

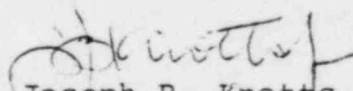
^{1/} Tr. 1290-91 and Order of April 13, 1982.

^{2/} Id.

DS08
5
./1

TUGCO is pleased to see that Brownsville does not object to settlement of the South Texas case, because this should pave the way to simultaneous approvals of the settlements in and orders terminating the South Texas and Comanche Peak proceedings. This would also seem to obviate the need for the intermediate step of severance of the proceedings; ^{3/} it would appear that the parties might better turn their attention to motions for termination of the proceedings.

Respectfully submitted,



Joseph B. Knotts, Jr.
DEBEVOISE & LIBERMAN
1200 Seventeenth Street, N.W.
Washington, D.C. 20036

Marilyn D. Sampels
WORSHAM, FORSYTEH, & SAMPELS
2001 Bryan Tower
Dallas, Texas 75201

Date: May 4, 1982

^{3/} TUGCO will of course still file for severance, if that course is indicated, and would expect to do so on a joint basis.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'82 MAY -4 P3:56

In the Matter of:)
)
HOUSTON LIGHTING AND POWER CO.,) Docket Nos. 50-498A
et al.) 50-499A
)
(South Texas Project, Units)
1 and 2))
)
TEXAS UTILITIES GENERATING) Docket Nos. 50-445A
COMPANY, et al.) 50-446A
)
(Comanche Peak Steam Electric)
Station, Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "TUGCO's Response to Brownsville's Answers to Judge's Questions" in the above captioned matters, were served upon the following persons by deposit in the United States mail, first class postage prepaid this 4th day of May, 1982.

Administrative Law Judge
James A. Laurenson
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Scott Stucky
Docketing and Service Branch
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Argil L. Toalston
Acting Chief, Utility Finance
Branch
Nuclear Reactor Regulation
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Merlyn D. Sampels, Esq.
Robert Wooldridge, Esq.
Spencer C. Relyea, Esq.
Worsham, Forsythe & Sampels
2001 Bryan Tower, Suite 2500
Dallas, Texas 75201

Jon C. Wood, Esq.
W. Roger Wilson, Esq.
Matthews, Nowlin, Macfarlane &
Barrett
1500 Alamo National Building
San Antonio, Texas 78205

Dick Terrell Brown, Esq.
800 Milam Building
San Antonio, Texas 78205

E.W. Barnett, Esq.
J. Gregory Copeland, Esq.
Michael Baldwin, Esq.
Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

R. Gordon Gooch, Esq.
Steven R. Hunsicker, Esq.
Baker & Botts
1701 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Stephen H. Lewis, Esq.
Ann P. Hodgdon, Esq.
Michael B. Blume, Esq.
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

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

Mr. Perry G. Brittain
President
Texas Utilities Company
2001 Bryan Tower
Dallas, Texas 75201

Nancy H. McMillen, Esq.
U.S. Department of Justice
Antitrust Division
P.O. Box 14141
Washington, D.C. 20444

Mr. G.W. Oprea, Jr.
Executive Vice President
Houston Lighting & Power
Company
P.O. Box 1700
Houston, Texas 77001

Nicholas M. Meiszer, City
Manager
City of Austin
P.O. Box 1088
Austin, Texas 78767

Richard C. Balough
Assistant City Attorney
City of Austin
P.O. Box 1088
Austin, Texas 78767

J.A. Bouknight, Esq.
Douglas G. Green, Esq.
Lowenstein, Newman, Reis,
Axelrad and Toll
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

John W. Davidson, Esq.
Sawtelle, Goode, Davidson &
Tioiolo
1100 San Antonio Savings Bldg.
San Antonio, Texas 78205

Douglas F. John, Esq.
McDermott, Will and Emery
1101 Connecticut Avenue, N.W.
Suite 1201
Washington, D.C. 20036

Bill D. St. Clair, Esq.
Morgan Hunter, Esq.
McGinnis, Lockridge & Kilgore
Fifth Floor
Texas State Bank Building
900 Congress Avenue
Austin, Texas 78701

Michael I. Miller, Esq.
David M. Stahl, Esq.
Isham, Lincoln & Beale
3 National Plaza
Suite 5200
Chicago, Illinois 60603

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

George Spiegel, Esq.
Robert C. McDiarmid, Esq.
Robert Jablon, Esq.
Marc Poirier, Esq.
Spiegel & McDiarmid
2600 Virginia Avenue, N.W.
Suite 312
Washington, D.C. 20037

W.N. Woolsey, Esq.
Dyer and Redford
1030 Petroleum Tower
Corpus Christi, Texas 78474

Mr. Donald M. Clements
Gulf States Utilities Company
P.O. Box 2951
Beaumont, Texas 77704

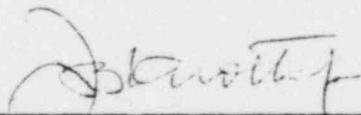
Mr. William C. Price
Central Power & Light Company
P.O. Box 2121
Corpus Christi, Texas 78403

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

Kevin B. Pratt, Esq.
Attorney General's Office
State of Texas
P.O. Box 12548
Austin, Texas 78711

William H. Burchette, Esq.
Heron, Haggart, Ford, Burchette
and Ruckert
1200 New Hampshire Avenue, N.W.
Suite 420
Washington, D.C. 20036

J.K. Spruce, General Manager
City Public Service Board
P.O. Box 1771
San Antonio, Texas 78296



Joseph B. Knotts, Jr.