LAW OFFICES SPIEGEL & McDIARMID 2600 VIRGINIA AVENUE, N. W. WASHINGTON, D. C. 20037 TELEPHONE (202) 333-4500 GEORGE SPIEGEL ROBERT C. MCDIARMID SANDRA J. STREBEL DANIEL J. GUTTMAN DAVID R. STRAUS ROBERT A. JABLON BONNIE S. BLAIR JAMES N. HORWOOD October 16, 1978 ROBERT HARLEY BEAR ALAN J ROTH THOMAS C. TRAUGER FRANCES E. FRANCIS DANIEL I. DAVIDSON JAMES CARL POLI.OCK THOMAS N. MCHUGH, JR. Marshall E. Miller, Esq., Chairman Michael L. Glaser, Esq. Atomic Safety and Licensing Board 1150 Seventeenth Street, N. W. Pane1 Washington, D. C. 20036 U. S. Nuclear Regulatory Commission Washington, D. C. 20555 Sheldon J. Wolfe, Esq. Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555 RE: Houston Lighting & Power Company., et al., (South Texas Units 1 and 2), NRC Docket Nos. 50-4984 and 50-499A Gentlemen: The Public Utilities Board of the City of Brownsville, Texas ("Brownsville") has largely completed its review of the approximately 55,000 discovery documents produced in West Texas Utilities Co. v. Texas Electric Service Co., Case No. CA3-76-0633F in the United States District Court for the Northern District of Texas, Dallas Division, and made available for inspection in Houston by Houston Lighting & Power Company. Some of the documents thus far designated by Brownsville for copying have been received. It is our understanding that more are on the way. During September, Brownsville completed a review of the voluminous file available for inspection at the Texas Public Utilities Commission in Austin, Texas, in The Matter of the Emergency Hearing on Intrastate and Interstate Service of Texas Interconnected System, PUC Docket No. 14. To expedi 2 its review of the discovery already produced in the various related cases, and to reduce the associated cost and burden, Brownsville attempted to set up an arrangement whereby it could review documents and deposition material already received by the Department of Justice in Washington. Brownsville has not been able to work out such an arrangement, but will continue to attempt such coordination among the parties to the extent possible. 7810270390

To date, Brownsville has neither received nor initiated any discovery requests. Brownsville has, however, been analyzing its needs as to additional discovery and believes it will be able to submit such discovery requests as it may determine to be necessary within a few weeks.

Respectfully submitted,

Robert a fable

Robert A. Jablon

Attorney for Public Utilities Board of the City of Brownsville, Texas

cc: All Parties

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

HOUSTON LIGHTING & POWER COMPANY,

The City of San Antonio,

The City of Austin, and

Central Power and Light Company

(South Texas Project,

Unit Nos. 1 & 2)

Docket Nos. 50-498A 50-499A

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing letter has been served on each of the following persons by deposit in the United States mail this 16th day of October, 1978:

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October 16, 1978