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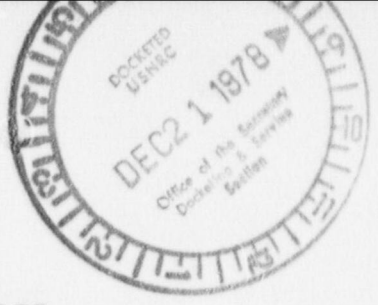

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

TUGCO'S MOTION FOR EXTENSION OF TIME

Pursuant to 10 C.F.R. §2.711, Texas Utilities Generating Company, et al., ("TUGCO") a party intervenor in the captioned South Texas matter, hereby moves for an extension of time to and including January 12, 1979 within which to file answers or objections, produce documents, or otherwise plead with respect to the "First Set of Interrogatories and Requests for Production of Documents From Department of Justice to Houston Lighting & Power and TU Companies" dated November 22, 1978.

The subject interrogatories and document requests are extensive, comprising some 13 pages (plus 8 pages of preferatory material). The interrogatories and requests for production of documents include 25 separate items, most of which have numerous subparts. The nature of the requests is extremely broad and general and apparently will involve a considerable number of documents and has already taken very considerable effort toward preparation of responses. It appears quite literally impossible

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for TUGCO, et al to respond within the 30-day period initially agreed upon.

CONCLUSION

We respectfully request that the time within which TUGCO may answer, produce documents, file objections or otherwise plead be extended to and including January 12, 1979. Counsel for the Department has been informed of our requests for extension of time and has authorized the undersigned counsel to state that the Department has no objection to the requested time extension being granted.

Respectfully submitted,

Joseph B. Knotts, Jr.
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Date: December 20, 1978

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "TUGCO's Motion for Extension of Time" in the captioned matter were served upon the following persons by deposit in the United States mail, first class postage prepaid, this 20th day of December, 1978.

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