

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
TEXAS UTILITIES GENERATING) Docket Nos. 50-445A
COMPANY, et al.) 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))

ANSWER OF CENTRAL AND SOUTH WEST CORPORATION, ET AL.
TO THE MOTION BY TEXAS UTILITIES GENERATING
COMPANY FOR PARTIAL CONSOLIDATION

On November 16, 1978, Texas Utilities Generating Company moved for partial consolidation of the above-referenced matters. Central and South West Corporation ("CSW") and its four operating subsidiaries^{*/} are intervenors in the Comanche Peak proceeding. Central Power & Light Company is an applicant in the South Texas proceeding. This filing represents the answer by CSW and its four operating subsidiaries to Texas Utilities Generating Company's Motion for Partial Consolidation.

CSW et al. believe that Texas Utilities Generating Company has demonstrated good cause for consolidation.

*/ Central Power & Light Company, Public Service Company of Oklahoma, Southwestern Electric Power Company and West Texas Utilities Company.

Consolidation will be conducive to the proper dispatch of the Commission's business and to the ends of justice. CSW et al., however, recommend full, rather than partial, consolidation of the two proceedings. There is no reason to engage in separate hearings, as common issues and parties are involved in the two proceedings. In the event issues unique to either South Texas or Comanche Peak arise during the course of the consolidated proceeding, the Board may make appropriate arrangements for separate consideration of any such issues at that time. In the event consolidation is ordered, the Board should establish dates applicable to the consolidated proceeding. Some adjustment in the date by which discovery must be concluded in the consolidated proceeding may well be required.

For the foregoing reasons, CSW et al. urge that full consolidation of the South Texas and Comanche Peak proceedings be ordered.

Respectfully submitted,

ISHAM, LINCOLN & BEALE

By 

One of the Attorneys for
CSW et al.

ISHAM, LINCOLN & BEALE
One First National Plaza
Suite 4300
Chicago, Illinois 60603
(312) 786-7500

1050 17th Street, N.W.
Seventh Floor
Washington, D.C. 20036
(202) 833-9730

Dated: December 1, 1978

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
TEXAS UTILITIES GENERATING)	Docket Nos. 50-445A
COMPANY, et al.)	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))	

CERTIFICATE OF SERVICE

I hereby certify that copies of the "Answer to Motion for Partial Consolidation" in the captioned matters were served upon the following persons by deposit in the United States mail, first class postage prepaid, this 1st day of December, 1978.

Marshall E. Miller, Esq.
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Michael L. Glaser, Esq.
1150 17th Street, N.W.
Washington, D.C. 20036

Sheldon J. Wolf, Esq.
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

Mr. Jerome D. Saltzman
Chief, Antitrust and
Indemnity Group
U.S. Nuclear Regulatory
Commission
Nuclear Reactor Regulation
Washington, D.C. 20555

J. Irion Worsham, Esq.
Merlyn D. Sampels, 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

Chase R. Stephens
Docketing and Service Branch
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

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

Roy P. Lessy, Jr., Esq.
Michael B. Blume, Esq.
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

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

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

R.L. Hancock, Director
City of Austin Electric Utility
P.O. Box 1086
Austin, Texas 78767

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

Charles G. Thrash, Jr., Esq.
E.W. Barnett, Esq.
Theodore F. Weiss, Esq.
J. Gregory Copeland, Esq.
Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

Don R. Butler, Esq.
Sneed, Vine, Wilkerson,
Selman & Perry
P.O. Box 1409
Austin, Texas 78767

Jerry L. Harris, Esq.
Richard C. Balough, Esq.
City of Austin
P.O. Box 1088
Austin, Texas 78767

Don H. Davidson
City Manager
City of Austin
P.O. Box 1088
Austin, Texas 78767

J.A. Bouknight, Jr.
Lowenstein, Newman, Reis &
Axelrad
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

John W. Davidson, Esq.
Sawtelle, Goode, Davidson &
Tioilo
1100 San Antonio Savings
Building
San Antonio, Texas 78205

Douglas F. John, Esq.
Akin, Gump, Haver & Feld
1100 Madison Office Building
1155 15th Street, N.W.
Washington, D.C. 20005

John D. Whitler, Esq.
U.S. Department of Justice
Antitrust Division
Washington, D.C. 20530

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

W.S. Robson
General Manager
South Texas Electric Cooperating,
Inc.
Route 6, Building 102
Victoria Regional Airport
Victoria, Texas 77901

Joseph B. Knotts, Jr.
Nicholas S. Reynolds
Debevoise & Liberman
806 15th Street, N.W. Ste. 700
Washington, D.C. 20005

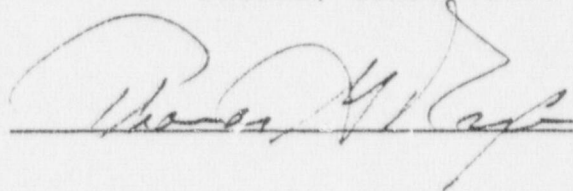
Ronald Clark
Energy Section
U.S. Department of Justice
Washington, D.C. 20044

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

Frederick H. Ritts, Esq.
Northcutt Ely
Watergate 600 Building
Washington, D.C. 20037

Robert C. McDiarmid, Esq.
Robert Jablon, Esq.
2600 Virginig Avenue, N.W.
Washington, D.C. 20037

J. Irion Worsham
M.D. Sampels
Spencer C. Relyea
Worsham, Forsythe & Sampels
2001 Bryan Tower Suite 2500
Dallas, Texas 75201



A handwritten signature in cursive script, appearing to read "Robert C. McDiarmid", is written over a horizontal line.