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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

HOUSTON LIGHTING & POWER
COMPANY, PUBLIC SERVICE
BOARD OF SAN ANTONIO, CITY OF
AUSTIN, CENTRAL POWER AND
LIGHT COMPANY
(South Texas Project, Unit Nos.
1 and 2)

NRC Docket Nos. 50-498A
50-599A

TEXAS UTILITIES GENERATING
COMPANY, et al.
(Comanche Peak Steam Electric
Station, Units 1 and 2)

NRC Docket Nos. 50-445A
50-446A

SUPPLEMENTAL ANSWER OF TEXAS UTILITIES COMPANY AND ITS
SUBSIDIARIES TO CENTRAL POWER AND LIGHT COMPANY'S
FIRST SET OF INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS ADDRESSED TO
TEXAS UTILITIES GENERATING COMPANY, ET AL

COME NOW TEXAS UTILITIES COMPANY ("TU"), TEXAS UTILITIES GENERATING COMPANY ("TUGCO"), DALLAS POWER & LIGHT COMPANY ("DPL"), TEXAS ELECTRIC SERVICE COMPANY ("TESCO"), and TEXAS POWER & LIGHT COMPANY ("TPL"), all collectively referred to as "TU Companies," in compliance with Section 2.740b and 2.741 of the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), and make the following Supplemental Answers to Central Power and Light Company's First Set of Interrogatories and Request for Production of Documents Addressed to Texas Utilities Generating Company, et al.

SUPPLEMENTAL ANSWERS 1 and 2:

1 and 2. It is impossible to answer these interrogatories with any precision until "Mode 4 Operations" is defined with precision. CSW has proposed various "Mode 4 Operations", including the PTI "Mode 4" attached to CSW's December 31, 1975, memorandum filed with the SEC, the so-called "Wood-Bruggeman" expansion plan testified to by Messrs. Wood and Bruggeman at SEC Docket No. 3-4951 in the Spring of 1978, the Bruggeman "Mode 4" expansion plan testified to by him in the Federal Court case in October, 1978, and the generation "Mode 4" plan which CSW attached to its petition in FERC Docket E-79-3.

In very general terms, implementation of any synchronous inter-connection between ERCOT and the Southwest Power Pool, among other things, results in the following:

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The TU Companies' transmissions systems would be subjected to massive imports of power.

ERCOT would lose its ability to react in emergencies, either through its present reliance upon governor response power or through reliance on underfrequency relays (the loss of which will require the development of new engineering techniques to automatically monitor and cause the generators to react instantaneously to emergency conditions if that is even possible without underfrequency relays).

The load-control centers which presently exist would have to be rearranged;

ERCOT's operating and planning criteria would require extensive modification; and

Communication procedures would require alteration.

A detailed analysis of one "Mode 4" plan as proposed by CSW is contained in the direct testimony of Mr. E. D. Scarth as filed in SEC Docket No. 3-4951 on July 2, 1979, and as is attached hereto.

INTERROGATORY NOS. 4 and 5:

4 and 5. The contracts referred to in previous answers to these interrogatories have been made available to CP&L and will so again be made available to CP&L at a time convenient to CP&L and the TU Companies. See TU's Answer and Supplemental Answer to the Department of Justice's Interrogatory No. 1 for a list of such contracts.

INTERROGATORY NOS. 14 and 15:

14 and 15. After making a reasonable inquiry of persons knowledgeable of the facts, attached hereto is a list of persons requesting information regarding future electric power costs where the request indicated the possibility of a new plan location or expansion.

INTERROGATORY NO. 22:

22. After making a reasonable inquiry of persons knowledgeable of the facts, attached hereto is a Summary of the area development activities of Dallas Power & Light, TESCO and Texas Power & Light during the period July 1977 through the date hereof.

INTERROGATORY NO. 23:

23. Many areas of coordination are available within ERCOT; however a determination of the feasibility of further coordination can only be made by proper study and analysis. Though often requested

to do so by TUCS, CSW has refused to permit CP&L and WTU to conduct such studies.

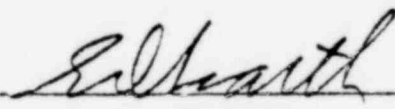
INTERROGATORY NO. 24:

24. In addition to the persons previously named in response to this interrogatory, the following persons at TU have assisted or provided information in response to the following interrogatories:

<u>PERSON</u>	<u>COMPANY</u>	<u>INTERROGATORY</u>
John Garretson	TUSI	all questions
Thomas Heath	TPL	12, 15, 22
T. Hatcher	TPL	9
Gene Seller	DPL	21
Don Raburn	DPL	12, 15, 22
Lee Westbrook	TESCO	1-2
Robert Martin	TESCO	20
Oscar Castillion	TESCO	12, 15, 22
Beryl Nichols	TESCO	16, 20, 21

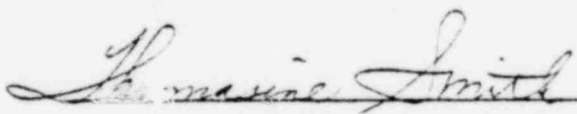
THE STATE OF TEXAS)
:
COUNTY OF DALLAS)

BEFORE ME, the undersigned authority, a Notary Public in and for Dallas County, Texas, on this day personally appeared E. D. SCARTH, well known to me to be a credible person, who after being by me first duly sworn, did depose and say that he is duly authorized to respond to the First Set of Interrogatories and Requests for Production of Documents from Central Power & Light Company on behalf of the TU Companies, has read the above and foregoing Supplemental Answer of Texas Utilities Company and its subsidiaries to said Interrogatories from Central Power & Light Company, and the same are true and correct, to the best of his knowledge and belief.



E. D. SCARTH

SUBSCRIBED AND SWORN TO before me this 21st day of August 1979, to certify which witness my hand and seal of office.



Notary Public in and for
Dallas County, Texas
THOMASINE SMITH, Notary Public
in and for Dallas County, Texas

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	:	
	:	
HOUSTON LIGHTING & POWER	:	NRC Docket Nos. 50-498A
COMPANY, PUBLIC SERVICE	:	50-499A
BOARD OF SAN ANTONIO, CITY OF	:	
AUSTIN, CENTRAL POWER AND	:	
LIGHT COMPANY	:	
(South Texas Project, Unit Nos.	:	
1 and 2)	:	
	:	
TEXAS UTILITIES GENERATING	:	
COMPANY, <i>et al.</i>	:	NRC Docket Nos. 50-445A
(Comanche Peak Steam Electric	:	50-446A
Station, Units 1 and 2)	:	

CERTIFICATE OF SERVICE

I hereby certify that service of the above and foregoing Supplemental Answer of Texas Utilities Company and its Subsidiaries to Central Power & Light Company's First Set of Interrogatories and Request for Production of Documents addressed to Texas Utilities Generating Company, *et al.* has been made on the following parties listed hereto this 21st day of August, 1979, by depositing copies thereof in the United States mail, first class, postage prepaid:

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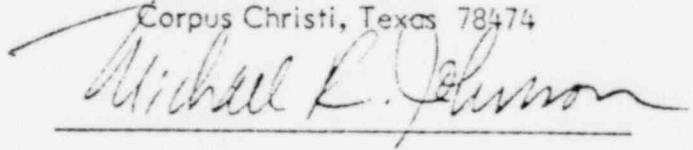
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