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October 10, 1979



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

Re: Houston Lighting & Power Company
South Texas Project, Units 1 and 2
(Docket Nos. 50-498A and 50-499A)

Gentlemen:

This is the September 1979 discovery report of Houston Lighting & Power Company.

During the month of September, counsel for Houston and/or the Texas Utilities Companies deposed the following individuals:

| | |
|-----------------|--|
| F. S. Buchanan | Cherokee County Electric Cooperative Association |
| L. E. Gross | Medina Electric Cooperative |
| Juan D. Nichols | Tex-La Cooperative, Inc. |
| W. S. Robson | South Texas Electric Cooperative, Inc. |

Counsel for Houston and/or the Texas Utilities Companies also attended the various depositions of Houston and City Public Service Board of San Antonio personnel that were conducted by the Department of Justice and the NRC Staff.

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Marshall E. Miller, Esquire
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The depositions of Aaron Autrey, Glen Churchill, B. J. Harris, Jack Wells and S. B. Phillips were postponed indefinitely. Houston retains the right to depose the aforementioned individuals at some later time should CP&L decide to call any of them as witnesses in this proceeding. The depositions of the Keeper of the Records for Deep East Electric Cooperative, Inc., Tex-La Electric Cooperative, Inc., Cherokee County Electric Cooperative Association and Upshur Rural Electric Cooperative Corporation were cancelled as a result of the production of the documents called for in the subpoenas to those entities. Counsel for Tex-La has identified and authenticated the produced documents as the business records of the aforementioned cooperatives.

On September 10, 1979, Houston filed a Motion to Compel Production by the Department of Justice of Certain Drafts of Testimony Prepared by William E. Scott. Houston received the Department's Answer on September 28, 1979.

Houston has supplied the NRC Staff with a list of the documents provided to Houston's expert engineering witness, Dr. Herbert Woodson. The list was produced on September 10, 1979.

In response to a letter from Houston's counsel, the Public Utilities Board of the City of Brownsville, Texas, supplied Houston with certain documents on September 13, 1979. Those documents were requested to enable Houston's counsel to prepare for upcoming depositions. Additional documents, including certain work papers of Brownsville's economic expert John W. Wilson, were received by Houston on September 28.

Respectfully submitted,

Peter G. Flynn

Peter G. Flynn

Attorney for Houston Lighting
& Power Company

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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 |) | Docket Nos. 50-498A |
| COMPANY, 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 the foregoing:
Discovery Report of Houston Lighting & Power Company for
September 1979

was served upon the following persons, by hand *, or by deposit in
the United States Mail, first class postage prepaid, this 10th
day of October, 1979.

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