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November 7, 1979



Roy P. Lessy, Jr., Esquire
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Roy:

Enclosed is a copy of the material which the Staff selected from the files of Abraham Gerber at the offices of the National Economic Research Associates, Inc. in New York. A bill for copying services is also enclosed.

Please be advised that counsel for Houston asserts a work product privilege as to the following documents which have not been produced:

- 1) Proposed cross examination scripts written by Mr. Gerber for use in the Securities and Exchange Commission proceeding. (June 1977).
- 2) Proposed deposition questions written by Mr. Gerber for use in the District Court trial (June 1977).
- 3) A letter from Mr. Gerber to Mr. Weiss of Baker & Botts proposing interrogatories to be addressed to Central Power and Light Company in the NRC proceeding. (January 2, 1979).

Houston's counsel is also in the process of indexing certain documents pertaining to the work of a nontestifying expert which Houston believes to be privileged. Houston will forward a complete list of such documents to the Staff as soon as possible.

Sincerely,

Peter G. Flynn

Peter G. Flynn

cc: All counsel of record

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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,)	Docket Nos. 50-498A
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

Letter to Roy P. Lessy, Jr., Esquire, from
Peter G. Flynn

were served upon the following persons, by hand*, or by
deposit in the United States Mail, first class postage pre-
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