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November 6, 1979

Marshall E. Miller, Esquire
Michael L. Glaser, Esquire
Sheldon J. Wolfe, Esquire
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 October 1979 discovery report of Houston Lighting & Power Company.

During the month of October, counsel for Houston deposed the following individuals:

W. C. Price	Central Power & Light Company
Joe Durham	Central Power & Light Company
Wayne Sieglin	Central Power & Light Company
Donald Hart	Taylor Electric Co-op
Holman King	West Texas Utilities
Gordon Taylor	Department of Justice (witness)

Counsel for Houston also attended the various depositions of Houston and other utilities' personnel that were conducted by the Department of Justice and the NRC Staff. In connection with the deposition of Mr. Gene Simmons, one of Houston's Vice Presidents, Houston obtained a protective order of confidentiality on October 12, 1979.

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Marshall E. Miller, Esq., et al.

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November 6, 1979

During the month, Houston inspected the files of West Texas Utilities ("WTU"), Southwestern Electric Power Company ("SWEPCO"), and Public Service Company of Oklahoma ("PSO"). These utilities are all operating subsidiaries of Central & Southwest Corporation ("C&SW"). Houston has yet to receive from C&SW attorneys the documents it selected for copying from the files of WTU and PSO. Most documents selected from SWEPCO's files have been received.

The depositions of R. O. Newman, Merle Marchbanks, Lamar Stall, John Turk, and R. L. Watt were postponed indefinitely, as a result of C&SW's representation that these persons are not expected to be called as witnesses. Houston retains the right to depose these individuals should C&SW decide to call any of them as witnesses in this proceeding or if Houston decides, on the basis of documentary discovery, to reschedule any such deposition. The deposition of Dr. John T. Wenders was postponed until mid-December.

During the month, Houston also received certain documents from the files of the Public Utility Board ("PUB") of Brownsville, Texas. Attorneys for PUB and Houston are continuing to work informally to resolve production in advance of Houston's depositions of PUB personnel.

Through agreement with attorneys for PUB, depositions of H. E. Hastings, R. E. Roundtree, Al Cisneros, Israel Liska, and L. R. Gawlik were rescheduled for mid-November. PUB also agreed to make Brownsville's mayor, Ruben Edelstein, available for deposition. On the basis of PUB's representation that George Lindsey is not expected to be called as a witness, Houston postponed his deposition indefinitely. PUB agreed that its expert witnesses, Dr. John W. Wilson and William R. Mayhen, will be deposed in mid-December.

Depositions of J. L. Johns and John H. Butts were rescheduled for the end of November.

Finally, in a related proceeding, the Supreme Court denied petitioner's motion to file a bill of complaint in New Mexico v. Texas, U.S. ___, 48 U.S.L.W. 3240 (No. 82 Orig., October 9, 1979). The State of New Mexico was seeking to challenge on constitutional grounds the order of the Public Utility Commission of Texas in Docket No. 14.

Respectfully submitted,

William J. Franklin

William J. Franklin

Attorney for Houston Lighting
& Power Company

cc: Per Service List

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
October, 1979

was served upon the following persons by deposit in the United States Mail, first class postage prepaid, this 6th day of November, 1979.

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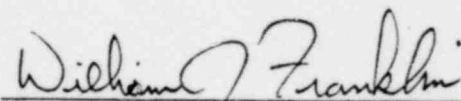
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