

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



(Allens Creek Nuclear Generating Station, Unit 1)

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Docket No. 50-466

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SCHEDULE FOR DEPOSITION

1. All documents related to your contentions admitted to date and all documents requested in the Applicant's First Interrogatories to John F. Doherty.

Instructions

If you claim that any document requested hereunder is privileged, with respect to each such document, please provide the following:

- (a) date;
- (b) type of document;
- (c) identity of author and addresses;
- (d) present location and custodian;
- (e) any other description necessary to enable the custodian to locate the particular document;
- (f) the basis for the claimed privilege; and
- (g) a detailed description of the nature of any judicial protection alleged to be necessary to protect the privilege or confidential nature of any such document.

"Documents" means, without limiting the generality of its meaning, all or original (or copies where originals are unavailable) and non-identical copies (whether different from originals by reason of notation made on such copies or otherwise) of all written, recorded or graphic matter, however produced or reproduced, whether or not now in existence, of correspondence, telegrams, notes or sound recordings of any type of conversation, meeting or conference, minutes of directors' or committee meetings, memoranda, inter-office communications, studies, analyses, notes, books, records, reports, summaries and results of investigations and tests, reviews, contracts, agreements, pamphlets, diaries, calendar or diary entries, maps, graphs, charts, statistical records, computer data or papers similar to any of the foregoing, however denominated, including preliminary versions, drafts or revisions of any of the foregoing and any supporting, underlying or preparatory material.

"Relating to" means consist of, refer to, reflect or be in any way legally, logically or factually connected with the matter discussed.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of	\$	
	\$	
HOUSTON LIGHTING & POWER COMPANY	\$	Docket No. 50-466
	\$	
(Allens Creek Nuclear Generating	\$	
Station, Unit 1)	\$	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion for Protective Order in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 24th day of October, 1979.

Sheldon J. Wolfe, Esq., Chairman
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. E. Leonard Cheatum
Route 3, Box 350A
Watkinsville, Georgia 30677

Mr. Gustave A. Linenberger
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Chase R. Stephens
Docketing and Service Section
Office of the Secretary of the
Commission
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

Richard Lowerre, Esq.
Assistant Attorney General
for the State of Texas
P. O. Box 12548
Capitol Station
Austin, Texas 78711

Hon. Charles J. Dusek
Mayor, City of Wallis
P. O. Box 312
Wallis, Texas 77485

Hon. Leroy H. Grebe
County Judge, Austin County
P. O. Box 99
Bellville, Texas 77413

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

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

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Steve Sohinki, Esq.
Staff Counsel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

John F. Doherty
4327 Alconbury Street
Houston, Texas 77021

Robert S. Framson
Madeline Bass Framson
4822 Waynesboro Drive
Houston, Texas 77035

Carro Hinderstein
8739 Link Terrace
Houston, Texas 77023

D. Marrack
420 Mulberry Lane
Bellaire, Texas 77401

Brenda McCorkle
6140 Darnell
Houston, Texas 77074

F. H. Potthoff, III
7200 Shady Villa, #110
Houston, Texas 77055

Wayne E. Rentfro
P. O. Box 1335
Rosenberg, Texas 77471

James M. Scott, Jr.
8302 Albacore
Houston, Texas 77074

Bryan L. Baker
1118 Montrose
Houston, Texas 77019

Dorothy F. Carrick
Box 409, Wagon Rd. Rfd. #1
Wallis, Texas 77485

Carolina Conn
1414 Scenic Ridge
Houston, Texas 77043

Elinore P. Cumings
Route 1, Box 138V
Rosenberg, Texas 77471

Stephen A. Doggett, Esq.
P. O. Box 592
Rosenberg, Texas 77471

Robin Griffith
1034 Sally Ann
Rosenberg, Texas 77471

Leotis Johnston
1407 Scenic Ridge
Houston, Texas 77043

Rosemary N. Lemmer
11423 Oak Spring
Houston, Texas 77043

Kathryn Otto
Route 2, Box 62L
Richmond, Texas 77469

Frances Pavlovic
111 Datonia
Bellaire, Texas 77401

Charles Perez
1014 Montrose
Houston, Texas 77019

William Schuessler
5810 Darnell
Houston, Texas 77074

Patricia L. Strelein
Route 2, Box 395C
Richmond, Texas

POOR ORIGINAL

Glen Van Slyke
1739 Marshall
Houston, Texas 77098

Donald D. Weaver
P. O. Drawer V
Simonton, Texas 77476

Connie Wilson
11427 Oak Spring
Houston, Texas 77043

C. Thomas Biddle, Jr.
C. Thomas Biddle, Jr.

POOR ORIGINAL