

December 3 1979

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

HOUSTON LIGHTING & POWER COMPANY

(Allens Creek Nuclear Generating
Station, Unit 1)

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Docket No. 50-466

POOR ORIGINAL

JOHN F. DOHERTY'S MOTION TO COMPEL ANSWERS FROM STAFF TO INTERROGATORIES
DATED MAY 25, 1979, JULY 17, 1979, JULY 31, 1979, and JUNE 6, 1979.

John F. Doherty, Intervenor in the above proceedings requests
the Board issue an order requiring Staff to reply to the Interroga-
tories listed above.

Background to this request is as follows. Intervenor was admitted
as a party in April, 1979. Staff has replied to one set of Interrog-
atories. Intervenor granted Staff additional time on the May 25, 1979
set, which consisted of 6 questions, due to staff personnel shortages
caused by the Three Mile Island event. A subsequent phone call to
Staff requesting answers to the interrogatories listed above yielded
assurances they would be answered. While this Intervenor feels he
has extended great latitude to Staff on this matter, it is simply a
handicap to not know the answers to some of these questions. This
Intervenor is reluctant to push Staff this way, but the proceedings
are now moving again after being side tracked and these answers are
needed in order to not delay proceedings.

Further, Staff has been extremely co-operative in every respect
save this. At risk of self-repeating, Intervenor preys the Board
issue an order compelling these answers, in order to expedite these
proceedings.

Copies of "John F. Doherty's Motion to Compel Answers from Staff
to (his) Interrogatories, Dated May 25, 1979, July 17, 1979, July
31, 1979, and June 6, 1979" were served via 1st class U. S. Postal
Service this 3rd of December, 1979 on the parties below.

Sheldon J. Wolfe, Esq. (NRC)	Carro Hinderstein, Esq.
Dr. E. Leannar Cheatum (NRC)	Brenda McCorkle, Esq.
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Clarence Johnson (TexPIRG)	

Respectfully submitted,

John F. Doherty
John F. Doherty
Intervenor

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