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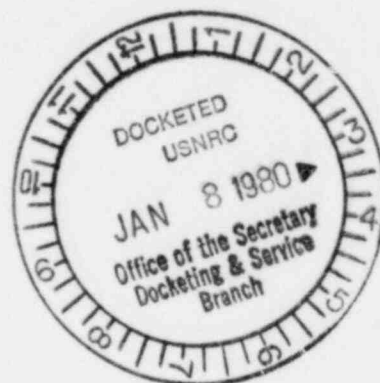
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January 8, 1980

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 December 1979 discovery report of Houston Lighting & Power Company.

During the month of December, counsel for Houston deposed Jack Gambrell of the Cajun Electric Power Cooperative, J. H. Butts of the Deep East Texas Electric Cooperative, Inc., and John Wilson, the economic expert witness of the Public Utilities Board of Brownsville, Texas ("PUB"). Mr. Wilson's deposition was not completed, and counsel for Houston and PUB have agreed to continue the deposition at a mutually convenient time.

Houston's counsel also attended the various depositions noticed by the Department of Justice ("Department") and/or the NRC Staff ("Staff").

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January 8, 1980  
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Depositions have been noticed for the thirteen witnesses recently designated by the Department. Three additional subpoenas duces tecum addressed to the City of College Station, the City of Vernon and the Tri-County Electric Cooperative, Inc., respectively, were also issued at Houston's request.

Houston served its Third Set of Interrogatories and Requests for Production of Documents on the Department and the Staff on December 18, 1979.

During December, Houston produced certain documents requested by the Department and the Staff respectively. Houston also received documents produced by the Central and South West Corporation and the PUB.

The Board ordered on October 23, 1979, that the Department must produce to Houston certain drafts of testimony prepared by the Department's expert engineering witness, William E. Scott. Houston still has not received copies of those drafts.

Finally, on July 19, 1979, during the deposition of the Staff's economic expert witness, Norman Lerner, Staff counsel agreed to provide Houston with copies of four or five memoranda which were called for in Houston's discovery requests but not included in the materials produced by the Staff. \*/ Although Houston recently renewed its request for production, the Staff has still not furnished copies of those memoranda.

Respectfully submitted,

*Peter G. Flynn*

Peter G. Flynn  
Attorney for Houston Lighting  
& Power Company

cc: Service List

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\*/ See Lerner deposition transcript at 98.

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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  
December 1979 discovery report of Houston Lighting  
& Power Company  
dated January 8, 1980 were served upon the following persons, by  
hand \*, or by deposit in the United States Mail, first class  
postage prepaid, this 8th day of January, 1980.

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Peter G. Flynn

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