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May 14, 1979

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RE: Houston Lighting & Power Company, et al. (South Texas Project, Units 1 & 2), Docket Nos. 50-498A and 50-499A; Texas Utilities Generating Company et al. (Comanche Peak Steam Electric Station, Units 1 & 2), Docket Nos. 50-445A and 50-446A

Gentlemen:

This is the April 1979 report of the Public Utilities Board of the City of Brownsville, Texas ("PUB") concerning the progress of discovery in the above-captioned proceeding.

PUB's major undertaking during the month of April was to complete responses to two sets of interrogatories and document requests, Central Power & Light Company's First Set of Interrogatories to and Requests for Production of Documents and Houston Lighting & Power Company's First Set of Written Interrogatories and First Request for Production of Documents.

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PUB's attempt to resolve informally its disagreements with Gulf States Utilities concerning the Gulf States response to the Licensing Board's February 26, 1979 Subpoena for Production of Documents proved unsuccessful. On April 25, 1979, Gulf States moved the Board for a Protective Order. PUB responded to this motion on May 10, 1979.

During the month PUB discussed with CP&L production of documents from other Central and South West companies, although final arrangements have yet to be made. Production will be based on the subpoenas requested by PUB in March, without any substantial changes. Contrary to CP&L counsel's remarks at the March 20 conference, these subpoena schedules contain numerous reductions in size and number of requests, which CP&L counsel acknowledged once PUB counsel pointed them out.

PUB has been in contact with counsel for TUGCO, which is not yet prepared to respond to PUB's request for production of documents filed on January 31, 1979. Although PUB was not informed that TUGCO considered its responses to the Department of Justice and Commission Staff as a possible substitute for responses to PUB, PUB is reviewing these responses with this thought in mind.

During April, PUB also received from San Antonio and Central Power & Light Company the copies it had requested of documents responsive to its discovery requests. Documents from Houston Lighting & Power Company were received in early May.

The Public Utilities Board of the City of Brownsville, Texas advises the Board and all parties that it has been admitted to membership in the Texas Interconnected System.

Respectfully submitted,

Marc Poirier

Marc R. Poirier
Attorney for the Public
Utilities Board of the City of
Brownsville, Texas

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UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
Houston Lighting & Power Company) Docket Nos. 50-498A
The City of San Antonio) and 50-499A
The City of Austin)
Central Power & Light Company)
(South Texas Project, Unit Nos.)
1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Monthly Discovery Report in the above captioned proceeding to be served on the following by deposit in the United States mail, first class, postage prepaid, this 14th day of May, 1979.

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