

LAW OFFICES
SPIEGEL & McDIARMID

2600 VIRGINIA AVENUE, N.W.
WASHINGTON, D.C. 20037
TELEPHONE (202) 333-4500
TELECOPIER (202) 333-2974

GEORGE SPIEGEL
ROBERT C. McDIARMID
SANDRA J. STREBEL
ROBERT A. JABLON
JAMES N. HORWOOD
ALAN J. ROTH
FRANCES E. FRANCIS
DANIEL I. DAVIDSON
THOMAS N. McHUGH, JR.
DANIEL J. GUTTMAN
PEYER K. MATT
DAVID R. STRAUS

BONNIE S. BLAIR
ROBERT HARLEY BEAR
THOMAS C. TRAUGER
JOHN MICHAEL AURAGNA
CYNTHIA S. BOGORAD
(MASSACHUSETTS BAR ONLY)
GARY J. NEWELL
MARC R. POIRIER

May 14, 1979

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

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

Michael L. Glaser, Esquire
1150 17th Street, N. W.
Washington, D. C. 20036



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.

501 224

7908080 525

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

UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

1. 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.

Marshall E. Miller, Chairman
Atomic Safety & Licensing Board
Panel
Nuclear Regulatory Commission
Washington, D. C. 20555

Sheldon J. Wolfe, Esquire
Atomic Safety & Licensing Board
Panel
Nuclear Regulatory Commission
Washington, D. C. 20555

Michael L. Glaser, Esquire
1150 17th Street, N. W.
Washington, D. C. 20036

Joseph Rutberg, Esquire
Antitrust Counsel
Counsel for NRC Staff
Nuclear Regulatory Commission
Washington, D. C. 20555

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

Joseph J. Saunders, Esquire
Chief, Public Counsel &
Legislative Section
Department of Justice
P. O. Box 14141
Washington, D. C. 20044

Joseph Gallo, Esquire
Richard D. Cudahy, Esquire
Robert H. Loeffler, Esquire
Isham, Lincoln & Beale
Suite 701
1050 17th Street, N. W.
Washington, D. C. 20036

John D. Whitler, Esquire
Ronald Clark, Esquire
Department of Justice
P. O. Box 14141
Washington, D. C. 20044

Joseph Knotts, Esquire
Nicholas S. Reynolds, Esquire
Debevoise & Liberman
1200 17th Street, N. W.
Washington, D. C. 20036

Douglas F. John, Esquire
Akin, Gump, Hauer & Feld
1100 Madison Office Building
1155 15th Street, N. W.
Washington, D. C. 20024

R. Gordon Gooch, Esquire
John P. Mathis, Esquire
Baker & Botts
1701 Pennsylvania Avenue, N. W.
Washington, D. C. 20006

Robert Lowenstein, Esquire
J. A. Bouknight, Esquire
Lowenstein, Newman, Reis &
Axelrad
1025 Connecticut Avenue, N. W.
Washington, D. C. 20036

William J. Franklin, Esquire
Lowenstein, Newman, Reis &
Axelrad
1025 Connecticut Avenue, N. W.
Washington, D. C. 20036

Frederick H. Ritts, Esquire
Law Offices of Northcutt Ely
Watergate 600 Building
Washington, D. C. 20037

Wheatley & Wolleson
1112 Watergate Office Building
2600 Virginia Avenue, N. W.
Washington, D. C. 20037

Roff Hardy, Chairman and Chief
Executive Officer
Central Power & Light Company
P. O. Box 2121
Corpus Christi, Texas 78403

G. K. Spruce, General Manger
City Public Service Board
P. O. Box 1771
San Antonio, Texas 78203

Joseph I. Worsham, Esquire
Merlyn D. Sampels, Esquire
Worsham, Forsythe & Sampels
2001 Bryan Tower, Suite 2500
Dallas, Texas 75201

Spencer C. Relyea, Esquire
Worsham, Forsythe & Sampels
2001 Bryan Tower, Suite 2500
Dallas, Texas 75201

R. L. Hancock, Director
City of Austin Electric
Utility Department
P. O. Box 1088
Austin, Texas 78767

Jerry L. Harris, Esquire
City Attorney
City of Austin
P. O. Box 1088
Austin, Texas 78767

Richard C. Balough, Esquire
Assistant City Attorney
City of Austin
P. O. Box 1088
Austin, Texas 78767

Dan H. Davidson
City Manager
City of Austin
P. O. Box 1088
Austin, Texas 78767

Don R. Butler, Esquire
Sneed, Vine, Wilkerson, Selman
& Perry
P. O. Box 1409
Austin, Texas 78767

Morgan Hunter, Esquire
McGinnis, Lochridge & Kilgore
900 Congress Avenue
Austin, Texas 78701

Jon C. Wood, Esquire
W. Roger Wilson, Esquire
Matthews, Nowlin, Macfarlane
& Barrett
1500 Alamo National Building
San Antonio, Texas 78205

Perry G. Brittain, President
Texas Utilities Generating
Company
2001 Bryan Tower
Dallas, Texas 75201

E. W. Barnett, Esquire
Charles G. Thrash, Jr., Esquire
Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

J. Gregory Copeland, Esquire
Theodore F. Weiss, Jr., Esquire
Baker & Botts
3000 One Shell Plaza
Houston, Texas 77002

G. W. Oprea, Jr.
Executive Vice President
Houston Lighting & Power Company
P. O. Box 1700
Houston, Texas 77001

W. S. Robson, General Manager
South Texas Electric Cooperative,
Inc.
Route 6, Building 102
Victoria Regional Airport
Victoria, Texas 77901

Michael I. Miller, Esquire
Richard E. Powell, Esquire
Isham, Lincoln & Beale
One First National Plaza
Chicago, Illinois 60603

Kevin B. Pratt, Esquire
Assistant Attorney General
P. O. Box 12548
Capital Station
Austin, Texas 78711

Linda L. Aaker, Esquire
Assistant Attorney General
P. O. Box 12548
Capital Station
Austin, Texas 78711

John E. Mathews, Jr., Esquire
Mathews, Osborne, Ehrlich,
McNatt, Gobelman & Cobb
1500 American Heritage Life Bldg.
Jacksonville, Florida 32202

Robert E. Bathen
R. W. Beck & Associates
P. O. Box 6817
Orlando, Florida 82803

Somervell County Public Library
P. O. Box 417
Glen Rose, Texas 76403

Maynard Human, General Manager
Western Farmers Electric Coop.
P. O. Box 429
Anadarko, Oklahoma 73005

James E. Monahan
Executive Vice President and
General manager
Brazos Electric Power Coop., Inc.
P. O. Box 6296
Waco, Texas 76706

Judith Harris, Esquire
Department of Justice
P. O. Box 14141
Washington, D. C. 20044

David M. Stahl, Esquire
Thomas G. Ryan, Esquire
Isham, Lincoln & Beale
One First National Plaza
Chicago, Illinois 60603

Knoland J. Plucknett
Executive Director
Committee on Power for the
Southwest, Inc.
5541 Skelly Drive
Tulsa, Oklahoma 74135

Jerome Saltzman, Chief
Antitrust & Indemnity Group
Nuclear Regulatory Commission
Washington, D. C. 20555

Jay M. Galt, Esquire
Looney, Nichols, Johnson &
Hayes
219 Couch Drive
Oklahoma City, Oklahoma 73101

Marc Poirier

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

May 14, 1979

Law offices of:
Spiegel & McDiarmid
2600 Virginia Avenue, NW
Washington, D.C. 20037
202-333-4500

501 229