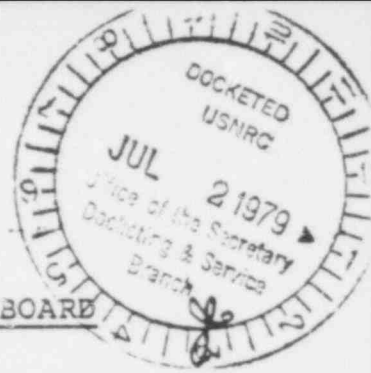


RELATED CORRESPONDENCE

NEC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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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X

Docket No. 50-466.

SECOND SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION FROM THE STATE OF TEXAS

TO: HOUSTON LIGHTING & POWER COMPANY, Applicant, by serving
its attorney, Mr. J. Gregory Copeland, Baker & Botts,
One Shell Plaza, Houston, Texas 77002.

Pursuant to Sections 2.740b and 2.741 of the Commission's Rules of Practice, the Attorney General of Texas, on behalf of the State of Texas, serves these Interrogatories and Requests for Production of Documents upon you. The answers to interrogatories shall be made under oath, separately and fully in writing, within fourteen (14) days after service and production of documents shall be made within thirty (30) days after service. A true copy of these interrogatories and requests for production is being filed with the Atomic Safety and Licensing Board together with proof of service. These interrogatories are continuing interrogatories and Applicant is hereby put on notice that he is under a duty to supplement his responses to these interrogatories and correct any errors as soon as Applicant learns of the additional information of error.

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In your answer, repeat interrogatory set forth herein and then set forth the answer thereto separately and fully. As to any interrogatory, part of any interrogatory that you refuse to answer for any reason, separately state the grounds for any such refusal. Where a complete answer to a particular interrogatory or part of an interrogatory is not possible, such interrogatory should be answered to the extent possible and a statement made indicating the reason for the partial answer. Answers cannot refer to licensing applications or other documents previously submitted, since such documents are not always readily available to the interested state agency. Please produce copies of any materials referred to from previously submitted application documents.

DEFINITIONS

A. The terms "you, your, and Applicant" shall refer to the Houston Lighting & Power Company and any persons, including attorneys and accountants, acting as agents for Houston Lighting & Power Company.

B. The word "identify" when used in reference to a natural person means to state his full name and present or last known address, his present or last known position in business affiliation, and each of his positions during the relevant period; when used in reference to a business entity, means to state the name, address and any account or computer number to which such entity is referred to in your records; when used in reference to a document, means to state the

type of document (i.e., letter, memorandum, chart, sound production, report, computer input or output, etc.), the location where it is maintained, all identifying marks and codes, the addressee, the document date, author, and persons to whom copies were sent or persons initiating or reading or approving the document and the name of each of the present custodians of the document. If any such document was, but is no longer in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of, and in each instance, explain the circumstances surrounding an authorization for such disposition thereof and state the date or approximate date thereof.

C. The terms "document" or "documentation" mean and include every writing or record of any type and description that is in your possession, control or custody of your attorney's possession, control or custody as of the date of filing your answers to these Interrogatories, including, but not limited to, correspondence, memoranda, stenographic or handwritten notes, drafts, studies, publications, invoices, ledgers, journals, books, records, accounts, pamphlets, voice recordings, reports, surveys, statistical compilations, work papers, data processing cards, computer tapes or print outs, or any other writing or recording of any kind. The term "document" also includes every copy of a writing or record where such copy contains any commentary or notation

of any kind that does not appear on the original or on any other copy. Without limitation of the term "control", a document is deemed to be within your control if you have ownership, possession, or custody of the document or a copy thereof, or the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.

D. "Studies" means all analyses of every type, including but not limited to evaluations, report, research, examinations, abstracts, criticisms, calculations, tabulations, compilations, compendiums, surveys, book essays, monographs, and all other investigations, published or unpublished.

INTERROGATORIES

INTERROGATORY NO. 1. Identify all studies and contracts for studies performed or executed by Applicant which relate to the evaluation of siltation or sediment load on the Allens Creek Lake.

INTERROGATORY NO. 2. Identify any studies or contracts for studies or documents which analyze, evaluate or examine the sediment load and siltation or deposition of the sediment that will enter the Allens Creek Lake from Allens Creek.

INTERROGATORY NO. 3. Identify all the studies performed by or contracted by Applicant or in possession of Applicant that relate to or deal with potential reproduction or spawning of large mouth bass in Allens Creek Lake.

INTERROGATORY NO. 4. Has Applicant performed any review or study of the effect of siltation from Allens Creek on

spawning areas for large mouth bass? If so, please identify such studies.

INTERROGATORY NO. 5. Has Applicant done any review or studies of the effect of siltation from Allens Creek on the value or potential use of proposed Parks & Wildlife Department Park located on the Allens Creek Lake? If so, identify any such studies.

For any studies, documents, reports or evaluations identified by Applicant in response to Interrogatories 1 - 5 please provide a copy or access for review by State.

INTERROGATORY NO. 6. Identify all expert witnesses you intend to call to testify or to present evidence on the issues of siltation or sediment loading on Allens Creek Lake, reproduction of large mouth bass, value of sport fishing in Allens Creek Lake, and value of Allens Creek Lake as recreationable facility.

INTERROGATORY NO. 7. Identify for each interrogatory the person or persons who provided or worked on the production of the answer.

Respectively submitted,


MARK WHITE
Attorney General of Texas

JOHN W. FAINTER, JR.
First Assistant Attorney General

TED L. HARTLEY
Executive Assistant Attorney General

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619078


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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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HOUSTON LIGHTING & POWER COMPANY

(Allens Creek Nuclear Generating
Station, Unit 1)

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X

Docket No. 50-466

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Response to The Second Set of Interrogatories and Requests for Production from the State of Texas in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 27 day of June, 1979.

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

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Hon. John R. Mikeska
Austin County Judge
P. O. Box 310
Bellville, Texas 77418

Hon. Jerry Sliva, Mayor
City of Wallis, Texas 77485

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

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

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Brenda A. McCorkle
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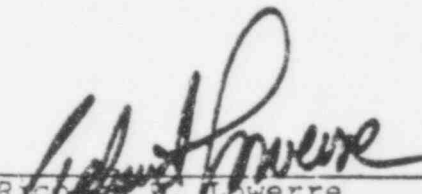
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Richard W. Lowerre
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