

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
HOUSTON LIGHTING AND POWER CO.,)	Docket Nos. 50-498A
<u>et al.</u>)	50-499A
)	
(South Texas Project, Units)	
1 and 2))	
)	
TEXAS UTILITIES GENERATING)	Docket Nos. 50-445A
COMPANY, <u>et al.</u>)	50-446A
)	
(Comanche Peak Steam Electric)	
Station, Units 1 and 2))	

TUGCO'S REPLY TO JOINT MOTION
OF DEPARTMENT OF JUSTICE AND NRC STAFF
FOR PARTIAL RECONSIDERATION OF THE
BOARD'S ORDER OF JUNE 25, 1979
REGARDING DISCOVERY AND HEARING SCHEDULE

The Department of Justice and the NRC Staff have filed a joint motion to extend the discovery and hearing schedule in the captioned matters. The schedule sought by the Staff and the Department would extend by about 60 days the cutoff for discovery set by the Board in its June 25, 1979 order, and defer other milestones correspondingly. The proposed discovery cutoff would extend 30 days beyond the outside period of 90 days suggested by the NRC Staff (T.R. 448) at the June 1, 1979 prehearing conference.

TUGCO would be willing to accept the outside date proposed by the Staff at the June 1, 1979 prehearing conference which would extend the discovery cutoff until November 30, 1979. This is consistent with TUGCO's understanding of the Staff's preferred approach as of June 1 upon which TUGCO acted in ~~ap~~ 20348 applying for subpoenas on June 18, prior to the June 25 Order.

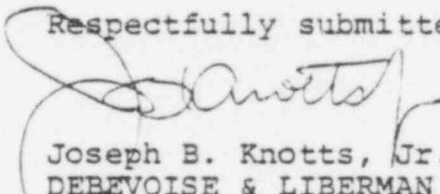
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The Department and the Staff point out that their proposed schedule of depositions represents an attempt both to make use of the dates not already scheduled for depositions by Houston Lighting & Power and TUGCO, and, in some cases, to take more than one deposition on the same day.

TUGCO believes that, with even greater use of open dates and multiple depositions, the discovery needs of all parties can be accommodated within a November 30, 1979 cutoff date.

Therefore, while TUGCO objects to the schedule proposed by the Staff and the Department, it would have no objection to a 30-day extension of all dates set forth in the Board's scheduling order of June 25, 1979. By the same token, TUGCO would oppose the issuance of subpoenas for depositions after November 30, 1979 (subpoenas for depositions numbers 6 through 20 listed in Appendix B to the joint motion and shown on the calendar attached thereto for December 1979).

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that copies of "TUGCO's Reply to Tex-La's Motion for Extension of Time" and "TUGCO's Reply to Joint Motion of Department of Justice and NRC Staff for Partial Reconsideration of the Board's Order of June 25, 1979 Regarding Discovery and Hearing Schedule" in the above captioned matters dated July 9, 1979, were served upon the following persons by deposit in the United States mail, first class, postage prepaid this 10 day of July, 1979:

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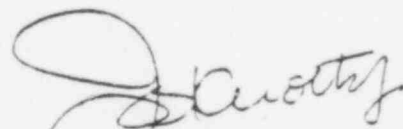
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