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August 7, 1979

Marshall E. Miller, Esquire
Michael L. Glaser, Esquire
Sheldon J. Wolfe, Esquire
Atomic Safety and Licensing Board Panel
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 July 1979 discovery report of Houston Lighting & Power Company.

During the month of July, counsel for Houston and/or the Texas Utilities Companies deposed each of the individuals whose names are listed below: 1/

Robert M. Gross	Southern Engineering Company
Maynard Human (individually and as Keeper of the Records)	Western Farmers Electric Cooperative
Keeper of the Records	C.H. Guernsey, Inc.
N.C. Lerner	Transcomm, Inc.
William F. Scott	U.S. Department of Energy
Carl Stover	C.H. Guernsey, Inc.
E. Eldridge Stridel (individually and as Keeper of the Records)	Sam Houston Electric Cooperative, Inc.

The depositions of both Caroline Smith of J.W. Wilson & Associates and Milton T. Potts of the Sam Houston Electric Cooperative

1/ In several instances, the depositions have been recessed and therefore may be resumed at some time in the future.

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were indefinitely postponed. Mr. Potts was initially identified as a potential fact witness by the Staff, and Ms. Smith was initially identified as a potential fact witness by the Staff and the Department. However, neither the Staff nor the Department now intends to call Mr. Potts or Ms. Smith, and they are not presently included on the potential witness lists of any other party. Houston therefore agreed to indefinitely postpone their respective depositions on the condition that Houston retains the right to depose these people if they are again added to a party's potential witness list.

Houston voluntarily exchanged with the Staff and the Department documents pertaining to the backgrounds of the parties' respective expert witnesses. The exchange involved lists and/or copies of the experts' prior testimonies and/or publications. 2/

On July 2, 1979, Brownsville produced documents responsive to Houston's interrogatories 23 and 44. Brownsville also furnished Houston with copies of those documents that Brownsville has provided to the Department and the Staff.

Houston had provided the Department with an updated privilege list on May 24, 1979. Since that time, counsel for the Department and Houston have conducted negotiations with regard to the status of certain documents. As a result of the negotiations, on July 3, 1979, Houston furnished to the Department copies of sixteen documents. The parties did not reach agreement as to all documents, however. Therefore, on July 11, 1979, the Department filed a motion to compel production by Houston of certain documents which Houston contends are privileged. Houston obtained an extension of time to respond until August 6, 1979, and on that day, Houston filed its answer in opposition to the Department's motion.

On July 12, 1979, Houston received from the Staff copies of documents consisting of communications between Staff counsel and its testifying expert witnesses. These documents were forwarded pursuant to the Board's order at the June 1, 1979 Prehearing Conference.

2/ Houston has still not received copies of the prior testimonies and publications of the Staff's engineering and power supply expert Robert Hartley. However, Staff counsel has assured Houston that these copies will be forwarded shortly.

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The Department filed its first supplemental response to Houston's second set of interrogatories and requests for production of documents on July 13, 1979.

Finally, on July 16, 1979, Houston received from the Staff a supplemental request for the production of documents.

Respectfully submitted,

Peter G. Flynn

Peter G. Flynn
Attorney for Houston Lighting &
Power Company

PGF/ar

cc: Service List