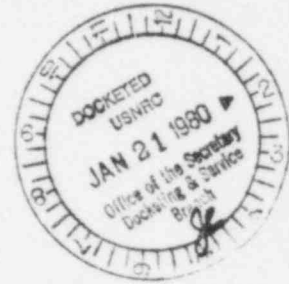


RELATED CORRESPONDENCE

January 16, 1980

Mr. Melbert Schwarz, Jr., Esquire  
Baker and Botts  
One Shell Plaza  
Houston, Texas 77002



Re: Docket Nos. 50-498  
50-499

Dear Mr. Schwarz:

Citizens Concerned About Nuclear Power, Inc. and Citizens for Equitable Utilities, Inc. would like to proceed with the examination and copying of documents at the South Texas Nuclear Project on January 24, 25, and 26, 1980. This three day period does include a Saturday (January 26). On behalf of Intervenor, I ask that you waive your previous objection to Saturday discovery so that there will be an opportunity to complete discovery without either requiring Intervenor to be away from their employment excessively or requiring Intervenor to make more than one trip to the project site - a round trip for Intervenor from San Antonio of seven hours.

On a related matter, Intervenor note your Supplement and Amendment to Applicants' Answers to First Set of Interrogatories and Motion for Inspection of Documents by Citizens for Equitable Utilities, et. al. dated January 11, 1980. In this reply to interrogatory number 49, it seems that both Applicants and Brown and Root, Inc. now find that they do have documents relating to the "alleged altercation" involving James Marshall. The Applicants' documents are at the project site, but the Brown and Root, Inc. documents are in Houston. Rather than make a special trip of four hundred (400) miles round trip for the Brown and Root, Inc. documents, which Intervenor assume are not extensive in nature, Intervenor respectfully request that Applicants provide a copy of documents held by Brown and Root, Inc. which relate to interrogatory number 49.

I look forward to hearing from you.

For Intervenor,

*Lanny Alan Sinkin*

Lanny Alan Sinkin  
116 Villita  
San Antonio, Texas 78205  
(512) 226-2959

c.c. Service list

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RELATED CORRESPONDENCE



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

HOUSTON LIGHTING AND POWER  
COMPANY, ET. AL.

(South Texas Project  
Units 1 and 2)

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Docket Nos. 50-498  
50-499

I hereby certify that copies of "MOTION TO COMPEL APPLICANTS TO BEAR EXPENSE OF COPYING PURSUANT TO INTERVENOR DISCOVERY" and "MOTION TO COMPEL APPLICANTS TO PROVIDE DISCOVERY ON SATURDAYS" in the above captioned proceeding have been served on the following by deposit in the United States mail, first class, this 16th day of January, 1980:

Charles Bechhoefer, Esq., Chairman  
Atomic Safety and Licensing Board  
Panel  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. James C. Lamb, III  
313 Woodhaven Road  
Chapel Hill, North Carolina 27514

Dr. Emmeth A. Luebke  
Atomic Safety and Licensing Board  
Panel  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

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

Docketing and Service Section (4)  
Office of the Secretary  
U. S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Lanny Alan Sinkin

Dated: January 16, 1980

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