

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
HOUSTON LIGHTING & POWER)
COMPANY, ET AL.)
)
(South Texas Project, Units)
1 and 2))

Docket Nos. 50-499 OL
50-499 OL

APPLICANTS' RESPONSE TO ATTORNEY GENERAL
OF TEXAS' MOTION FOR EXTENSION OF DISCOVERY DEADLINE

By motion dated April 21, 1983 (Motion), the Attorney General for the State of Texas has requested an extension of the discovery schedule in this proceeding for an additional ninety (90) days. The Attorney General's request for relief is premised upon "the unique circumstances" resulting from his recent election, and the many duties involved in making the transition to that post. Motion at 3.

Based upon the unique circumstances set forth in the Motion, Applicants do not object to the Board granting to the Attorney General a ninety (90) day extension of the original discovery deadline.^{*/} Applicants note, however, that none of the factors set forth by the Attorney General serve to justify an extension of

^{*/} The original discovery period expired on April 22, 1983. Thus, the extended discovery period would end on July 21, 1983.

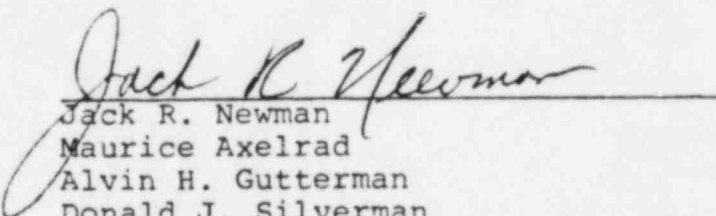
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the original deadline for any other party to this proceeding, and no such extension would be warranted.*/

For the reasons set forth above, Applicants request that the Board grant the Motion only to the extent that it seeks a ninety (90) day extension of the discovery period for the Attorney General.

Respectfully submitted,


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Dated: May 3, 1983

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ATTORNEYS FOR HOUSTON LIGHTING
& POWER COMPANY, Project Manager
of the South Texas Project acting
herein on behalf of itself and
the other Applicants, THE CITY OF
SAN ANTONIO, TEXAS, acting by and
through the City Public Service
Board of the City of San Antonio,
CENTRAL POWER AND LIGHT COMPANY,
and CITY OF AUSTIN, TEXAS

*/ In Applicants' Motion To Compel Answers To Its Sixth Set Of Interrogatories And For Leave To File Additional Interrogatories To CCANP, dated April 18, 1983, Applicants requested an opportunity to file one additional set of interrogatories on the basis of CCANP's failure to respond in a timely fashion. CCANP's delay effectively prevented Applicants from filing a set of follow-up questions within the schedule established by the Board. Applicants have not requested a general extension of the discovery period, and neither their motion nor the Attorney General's Motion justify such an extension. Similarly, CCANP has recently filed a Motion for Deferral of Rulings and Extension of Deadlines, dated April 20, 1983, seeking a number of extensions and postponements of Board decisions. Though Applicants will, of course, respond separately to that motion, nothing herein warrants the relief requested by CCANP.

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NUCLEAR REGULATORY COMMISSION

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In the Matter of)
)
HOUSTON LIGHTING AND POWER) Docket Nos. 50-498 OL
COMPANY, ET AL.) 50-499 OL
)
(South Texas Project, Units 1)
and 2))

CERTIFICATE OF SERVICE

I hereby certify that "Applicants' Response To Attorney General Of Texas' Motion For Extension Of Discovery Deadline" has been served on the following individuals and entities by deposit in the U. S. Mail, first class, postage prepaid on this 30 day of May, 1983.

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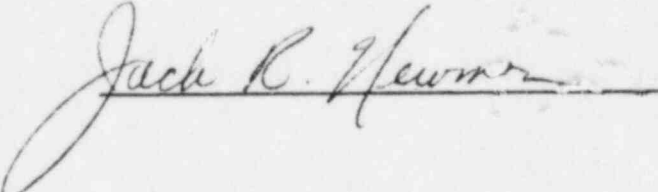
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A handwritten signature in cursive script, reading "Jack R. Hewman", is written over a horizontal line.