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January 8, 1978

1/8/78

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Re: Houston Lighting and Power Co., et al.  
(South Texas Project, Units No. 1 and 2),  
NRC Docket Nos. 50-498A and 50-499A)

Gentlemen:

On January 5, 1979, the Public Utilities Board of the City of Brownsville, Texas, sent you corrected initial interrogatories and a request for production of documents in the above-captioned proceeding.

This document was erroneously entitled "Corrected Initial Interrogatories to and First Request for Production of Documents by Houston Lighting & Power Company from the Public Utilities Board of the City of Brownsville, Texas." The Data Request was intended to be addressed to Central Power & Light Company and the title should so reflect. Please substitute the corrected pages one and nine enclosed for those pages in the interrogatories and request for documents sent you on January 5, 1979.

We regret any inconvenience this may have caused you.

Very truly yours,

*Marc Poirier*

Marc R. Poirier  
Attorney for the Public Utilities  
Board of the City of Brownsville,  
Texas

cc w/enlosure: All Parties

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UNITED STATES OF AMERICA  
BEFORE THE  
NUCLEAR REGULATORY COMMISSION

In the Matter of

Houston Lighting & Power Company	)	
The City of San Antonio	)	
The City of Austin	)	Docket Nos. 50-498A
Central Power & Light Company	)	and 50-499A
(South Texas Project, Units	)	
No. 1 & No. 2)	)	

CORRECTED INITIAL INTERROGATORIES TO AND FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS BY  
CENTRAL POWER & LIGHT COMPANY  
FROM THE PUBLIC UTILITIES BOARD OF THE  
CITY OF BROWNSVILLE, TEXAS

Pursuant to Sections 2.740, 2.740(b) and 2.741 of the Nuclear Regulatory Commission's Rules of Practice under the Atomic Energy Act, the Public Utilities Board of the City of Brownsville, Texas ("Brownsville") hereby files initial interrogatories to and requests the production of documents by Central Power & Light Company ("CP&L").

I. GENERAL INSTRUCTIONS

1. Each interrogatory should be answered separately and fully in writing under oath or affirmation by the person (or persons) making it.

2. Each document produced in response to this request should be referenced with the number(s) of the relevant request and subsection, if any. Should any of the documents requested pursuant to this set of interrogatories and requests for document production have already been made available for Brownsville's inspection, it will be sufficient to note this fact and to provide the following information: (1) document production number, if any; (2)

ties or assets of which have been acquired by CSW.

T. "Texas Utilities" or "TU" shall mean Texas Utilities Generating Company, its parent, affiliated, direct and indirect subsidiary and all predecessor companies, including, but not limited to, Texas Utilities Company, Dallas Power & Light Company, Texas Electric Service Company and Texas Power & Light Company.

U. "South Texas Units" shall be understood to refer to the nuclear generating units for which applicants in the above-captioned proceeding hold construction permits issued by the Nuclear Regulatory Commission.

### III. DOCUMENTS NO LONGER IN CP&L'S POSSESSION, CUSTODY, OR CONTROL:

If any document otherwise responsive to any request was, on or after December 19, 1970 (date of enactment of P. L. 91-560), but is no longer in CP&L's possession, or subject to CP&L's control, or in existence, state whether (1) it is missing or lost, (2) has been destroyed, (3) has been transferred voluntarily to others, or (4) has been otherwise disposed of. In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing its destruction or transfer, and the date(s) of such direction or authorization. Identify each such document by listing its author and addressee, type (e.g., letter, memorandum, telegram, chart, photograph, etc.), date, subject matter, whether the document (or copies) are still in existence, and if so, their present location(s)