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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. (CCANP)
MOTION FOR ADDITIONAL DISCOVERY

On March 14, 1984, the Atomic Safety and Licensing Board in this proceeding issued its Partial Initial Decision. ASLBP No. 79-421-07 OL. As part of that decision, the Board directed the NRC Staff "(and the Applicants and other parties if they wish)" to provide a report on "safety related construction activities (including implementation of the QA/QC program) following the assumption of duties by Bechtel and Ebasco." Id. at 6; See also Id. at 56-57, 286.

In essence, the Board has extended into the second phase of the operating license proceeding the inquiry posed by Issue B, i.e. whether the remedial actions taken by HL&P provide a sufficient basis for concluding that HL&P has the necessary character and competence to receive an operating license for a nuclear power plant.

The Partial Initial Decision was the first notice CCANP had that the record on Issue B would be extended during Phase II.

This extension of the issue is in part recognition of arguments presented by Citizens Concerned About Nuclear Power, Inc. (CCANP) in its Findings of Fact and Conclusions of Law for

Phase I of this proceeding. Id. at 55-56.

In order to be adequately prepared to participate in the litigation of this issue, CCANP requires further discovery on the performance of HL&P, Bechtel, and Ebasco since the transition from Brown and Root to Bechtel and Ebasco.

For the above and foregoing reasons, CCANP moves the Board to provide ninety (90) days of discovery to CCANP regarding this performance.

Respectfully submitted,

15/
Lanny Sinkin
Representative for Intervenor
Citizens Concerned About
Nuclear Power, Inc.

114 W. 7th, Suite 220
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Dated: March 29, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

84 APR -2 A11:07

In the Matter of
HOUSTON LIGHTING AND
POWER COMPANY, ET AL.
(South Texas Project,
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(
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(
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Docket Nos. 50-498 DL
50-499 DL

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CERTIFICATE OF SERVICE

I hereby certify that copies of CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. (CCANP) MOTION FOR ADDITIONAL DISCOVERY were served by deposit in the U.S. Mail, first class postage paid to the following individuals and entities on the 29th day of March 1984.

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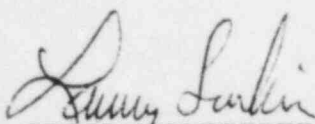
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