

RELATED CORRESPONDENCE

Thursday, June 13, 1985

Charles Bechhoefer, Esquire
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U. S. N. R. C.
Washington, D.C. 20555

Frederick J. Shon
Administrative Judge
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USNRC

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

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Re: Houston Lighting and Power Co., et al.
South Texas Nuclear Project
Docket Nos. 50-498 OL, 50-499 OL

Dear Members of the Board:

Enclosed is CCANP's Identification of Witnesses for the Phase II hearings.

It is CCANP's position that the normal showing required to call NRC witnesses - 10 C.F.R. Section 2.720(h)(2)(i) - is not required in this instance because the NRC Staff failed to provide any information as to what the witnesses to be called by the NRC will be testifying about. Without knowing what topics will be addressed by the witnesses identified by the NRC and given the Board's prior rulings that cross examination is limited to the scope of direct testimony, CCANP has no choice but to call the NRC witnesses CCANP considers to have the information necessary for CCANP to make its direct case.

In addition, CCANP has specified topics for witnesses identified as to be called by Applicants which may already be a part of their direct testimony but, in order to preserve CCANP's rights to ask questions in areas which might not actually be presented in the Applicants' direct case, such specification was made.

CCANP assumes that subpoenas will not in all cases be necessary in that at least the Applicants will agree to produce some of the witnesses requested by CCANP.

Pursuant to other obligations, I will be out of town from June 14 through June 17.

For CCANP,
Lanny Sinkin
Lanny Sinkin

c.c. Service List

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