

## WORSHAM, FORSYTHE, SAMPels &amp; WOOLDRIDGE

THIRTY-TWO HUNDRED 2001 BRYAN TOWER

DALLAS, TEXAS 75201 USNRC

TELEPHONE (214) 979-3000

JOE A. WORSHAM  
1981-1976OF COUNSEL  
JOS. IRION WORSHAM  
EARL A. FORSYTHE

TELECOPIER: (214) 880-0011

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

'85 SEP 23 A10:56

September 17, 1985

DOCKET NUMBER  
PROD. & UTIL. FAC. 50-445/446  
OL-2

M. D. SAMPels  
ROBERT A. WOOLDRIDGE  
NEIL D. ANDERSON  
SPENCER C. RELYEA  
RONALD M. HANSON  
J. DAN BOHANNAN  
TRAVIS E. VANDERPOOL  
JUDITH K. JOHNSON  
RICHARD L. ADAMS  
DAVID C. LONERGAN  
JOHN W. McREYNOLDS  
THOMAS F. LILLARD  
ROBERT K. WISE  
TIMOTHY A. MACK  
WM. STEPHEN BOYD  
MARK R. WASEM  
CHRISTOPHER R. MILTENBERGER  
ROBERT P. OLIVER  
MARK SCHWARTZ  
RICHARD G. MOORE  
CECELIA J. BRUNER

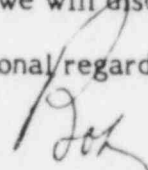
Ms. Billie Pirner Garde  
Trial Lawyers for Public Justice, P.C.  
2000 P Street, N.W., Suite 611  
Washington, D.C. 20036

Dear Billie:

Please excuse my delay in responding to your letter of September 4, 1985.  
We moved our offices this last weekend.

Your informal request for oral depositions indicates that the subject matter would coincide with the topics identified in your September 4, 1985 Request for Documents. We will be timely filing objections to a number of those requests. Such being the case, it doesn't seem appropriate to me for oral depositions to go forward until such time as we have had a ruling on those objections. Accordingly, I suggest that we defer consideration of date, place, etc., for oral depositions until such time as we can determine what topics are properly subject to discovery in this docket. If you disagree, please give me a call and we will discuss further.

Best personal regards,

  
Robert A. Wooldridge

RAW/klw  
cc: Service List

8509260365 850917  
PDR ADOCK 05000445  
G PDR

DS02