

DEMA 1

U. S. NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

ONLY
COPY

In the Matter of:

Houston Lighting & Power Co.,
(Allens Creek Nuclear Gen. Station
Unit 1)

Docket #50-466

TEXPIRG'S REPLY TO THE NRC'S FIRST SET OF INTERROGATORIES

1. Mr. Greg Skie, who is handling much of this contention for us states that "household waste", "commercial waste", or "residential waste" defines solid waste. Municipal solid waste is reckoned to produce approximately 7,000 BTU per pound of waste. According to a study by Browning & Ferris, a large refuse gatherer, 6,000 tons equals two landfills. For the categories of items, he suggests use of Handbook of Solid Waste Disposal from the Van Nostrand Engineering Series.

2. The precise area would be slightly larger than the city of Houston, and would include separate but engulfed communities as West University, Bellaire, South Houston, and Galena Park. I am not certain if it would include Pasadena. The average waste produced per person is 4 pounds per day. The data on area would remain the same until 1985. At the moment we have no basis to consider if the per person weight of waste will increase or decrease in the next six years, nor any studies to that effect.

As Mr. Skie will be away for a month, we merely took these down very quickly on his last visit before he left. When he returns, he might be able to give more details. We regret the delay in this answer.

James Scott

James M. Scott
Texpirg Attorney.

Sent to the following this 14th day of May, 1979,:

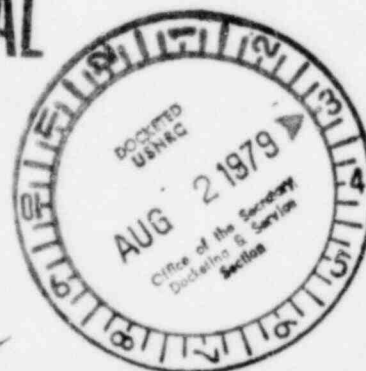
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STATE OF TEXAS X
 X
COUNTY OF HARRIS X

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared JAMES MORGAN SCOTT, JR., who upon his oath stated that he has answered the foregoing Tex PIRG's Response to NRC Staff's Interrogatories to Tex PIRG dated April 2, 1979 in his capacity as Attorney for Tex PIRG in this Construction Permit proceeding, and that all statements contained therein are true and correct to the best of his knowledge.

James Morgan Scott, Jr.
James Morgan Scott, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME by the said James Morgan Scott, Jr., on this 24th day of July, 1979.

Daxnette A. George
Notary Public in and for
Harris County, Texas

Commission expires 7-29-81

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