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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

HOUSTON LIGHTING & POWER COMPANY

(Allens Creek Nuclear Generating  
Station, Unit No. 1)

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Docket No. 50-466

APPLICANT'S RESPONSE  
TO TEXPIRG'S THIRD SET OF  
INTERROGATORIES TO HOUSTON  
LIGHTING & POWER COMPANY

In response to the interrogatories propounded by  
Texas Public Interest Research Group, Inc., Houston Lighting &  
Power (Applicant) answers as follows:

INTERROGATORY NO. 1: Is HL&P presently planning to construct  
a two-unit lignite combustion electrical generating plant in  
Limestone County, Texas? Provide information on the megawatt-  
(electrical) rating for each of those units.

ANSWER:

A. Yes. The nominal megawatt rating for the  
two-unit Limestone Electrical Generating Station is 750 MW  
per unit.

B. None.

C. None.

D. W. F. McGuire, Principal Engineer.

E. Not applicable.

1044 062

7909270 095

INTERROGATORY NO. 2: Table S.8.13 of the Final Supplement to the Final Environmental Statement, which cites as its source App. SH, p. SH-100 of the Environmental Report, lists all planned and proposed capacity additions of 100 MW or more for the 1978 to 1984 period. Why aren't the lignite facilities listed in response to Question #1 included in that table?

ANSWER:

A. Table S.8.13 of the Final Supplement to the FES was prepared by the NRC staff; however, the applicant surmises that the Limestone units were not included in the table because no plans to construct Limestone existed at the time the FES Supplement was prepared.

B. None.

C. None.

D. W. F. McGuire, Principal Engineer.

E. Not applicable.

INTERROGATORY NO. 3: Table S.8.14 of the Final Supplement to the FES (citing as its source ER Supp. Table S1.1-3) lists installed capacity for the Applicant, 1963 to 1987. Does this table include the installed capacity represented by the addition of the two lignite units mentioned in Question #1?

ANSWER:

A. No. See the response to 2A.

B-E. See response to 2B-E.

INTERROGATORY NO. 4: Assuming an affirmative response to #1, on what date did HL&P decide to build lignite units in Limestone County? When is physical construction on those units expected to begin and what is the expected start-up date for each unit?

ANSWER:

A. Initially in 1977 the plans of HL&P included a lignite facility to be constructed in Freestone County and

to be jointly owned by the Dow Chemical Company. Each company was to receive 50% of the output of the two-unit facility scheduled for commercial operation in 1982 and 1983. However, when Dow announced its withdrawal from the project in May 1978, HL&P began plans to develop a wholly owned lignite facility in the same general area. A letter of intent to purchase fuel was signed in June, 1979, and a public announcement of the project was made in July, 1979. Construction is expected to begin in October, 1981, with commercial operation scheduled for April, 1985 (Unit 1) and April, 1986 (Unit 2).

B. - Letter dated June 6, 1979, W. P. Schmechel, President, Northwestern Resources, to G. W. Oprea, Jr., Executive Vice President, HL&P.

C. None.

D. W. F. McGuire, Principal Engineer.

E. Not applicable.

INTERROGATORY NO. 5: What is the "need for power" basis of constructing both ACNGS and two lignite units in Limestone County?

ANSWER:

A. Applicant objects to this interrogatory on the grounds that the question is vague. The term "'need for power' basis" is not defined, is out of context and is without relevance to any admitted contention in this proceeding.

INTERROGATORY NO. 6: Why wasn't Limestone County considered as an alternative site for ACNGS? (Include an explanation of the reason such a site is considered for construction of another power plant in the Applicant's grid, if the site is not suitable for ACNGS.)

ANSWER:

A. The basis for alternate candidate site selection is presented in Chapter 9 of the ACNGS Environmental Report - Construction Permit Stage.

B. None.

C. Applicant's Response to TEXPIRG's First Set of Interrogatories to Houston Lighting & Power Company, March 26, 1979.

D. W. F. McGuire, Principal Engineer.

E. Not applicable.

INTERROGATORY NO. 7: During the 66th session of the Texas Legislature (Spring, 1979), what was the position, if any, taken by lobbyists registered on behalf of HL&P, with regard to H.B. 1501/S.B. 794 (Omnibus Solar Energy Act) and H.B. 1935/S.B. 804 (Solid Waste Energy Act)? What were the names of the lobbyists advocating those positions on behalf of HL&P?

ANSWER:

A. Applicant objects to this interrogatory on the grounds that it is not relevant to an admitted contention. Applicant's position on any legislation is not an issue in this proceeding and has absolutely no relevance to the factual merits of the accepted contentions.

INTERROGATORY NO. 8: Does HL&P have any written correspondence with an industrial energy consortium called CAM? In what officer's custody is that correspondence? State where TEXPIRG may inspect or copy that information.

ANSWER:

A. Applicant objects to this interrogatory on the grounds that it is overly broad and burdensome. Applicant's correspondence ranges over multiple issues and is dispersed in a number of files in various departments. Without some reasonable limitation on the scope and purpose of the inquiry, Applicant respectfully declines to oblige.

INTERROGATORY NO. 9: For what reasons did HL&P terminate a proposed joint electrical generation venture with Dow Chemical Company? Does HL&P have any correspondence on this matter, and how may TEXPIRG inspect that information?

1044 065

ANSWER:

A. Applicant objects to this interrogatory on the grounds that it is not relevant to any admitted contention. Applicant's negotiations with Dow Chemical Company were not concerned with self-generation nor co-generation techniques. Since this project has no relevance to the self-generation issue in TEXPIRG Contention 7 nor upon any other issue in an admitted contention, the subject matter is not within the scope of permissible discovery; the request further relates to matters which are confidential.

INTERROGATORY NO. 10: What was the projected impact of the venture mentioned in #9 above (at the time it was proposed) upon HL&P's total demand, installed capacity, and reserve margin?

ANSWER:

A. See response to Interrogatory No. 9.

INTERROGATORY NO. 11: In calculating increased electrical demand within the service area, list by company name and location the industrial users which are expected to comprise 15% or more of the increased industrial demand during the period of the calculation. State the percentage of total increased electrical demand each of these industrial users is expected to be responsible for.

ANSWER:

A. Applicant objects to this interrogatory on the grounds that it is vague, and Applicant cannot determine whether the question relates to individual companies or customer groups. The interrogatory is also objectionable in that it is without reference to a specific time.

INTERROGATORY NO. 12: With respect to the transportation of the reactor vessel, state the location and mode of placing the reactor vessel onto the barge that will enter the San Bernard River. By what means will the reactor vessel be transported to this loading location? Will the loaded barge enter the mouth of the San Bernard River?



ANSWER:

A. The reactor pressure vessel will be fabricated at the Chicago Bridge and Iron Nuclear facility, located on the Mississippi River in Memphis, Tennessee. The vessel will be loaded onto the barge at the CBIN facility and will be ultimately transported up the San Bernard River to the off-loading point.

B. None.

C. Applicant's Answers to Hinderstein's Second Set of Interrogatories and Requests for Production of Documents, April 17, 1979.

D. Jim Heidt, Project Engineer, General Electric.

E. The Applicant has retained Dames & Moore to prepare an environmental impact assessment of transporting the reactor pressure vessel to the Allens Creek site. This assessment will be presented through the testimony of an employee of Dames & Moore; however, the specific witness has not been identified at this time. It is conceivable that this testimony could address matters specific to this interrogatory.

INTERROGATORY NO. 13: Has HL&P received any communication, oral or written, from the NRC staff indicating that the Applicant should obtain a certificate of necessity and convenience from the Public Utility Commission prior to proceeding with construction permit application processes? If so, what was the date of that communication?

ANSWER:

A. Applicant objects to this interrogatory on the grounds that the certificate of convenience and necessity for ACNGS issued by the Public Utility Commission of Texas is not an issue relevant to any admitted contention in this proceeding.

INTERROGATORY NO. 14: HL&P recently obtained a Section 404 permit from the U.S. Army Corps of Engineers for the creation of certain culverts on the Allens Creek site. When does the Applicant plan to begin this work authorized under that permit?

ANSWER:

A. The Applicant intends to begin work authorized by U.S. Army Corps of Engineers Permit No. 13551 as soon as practical after receipt of a Construction Permit for Allens Creek Nuclear Generating Station Unit No. 1, to be issued by the NRC in the future.

B. None.

C. None.

D. P. A. Horn, Project Manager.

E. None.

INTERROGATORY NO. 15: List and describe any documents, reports, or internal memoranda on the advisability or feasibility of continuing the lifetime or extended use of natural gas plants through application of exemptions for areas with deteriorated air quality conditions in the Power Plant and Industrial Fuel Use Act of 1978.

ANSWER:

A. See answer to 16A.

B. None.

C. None.

D. W. F. McGuire, Principal Engineer.

E. None.

INTERROGATORY NO. 16: Does HL&P intend to seek any exemptions under the Power Plant and Industrial Fuel Use Act of 1978 in the near future in order to extend the use of presently operable natural gas power plants?

ANSWER:

A. Applicant is not able to answer this question because the Economic Regulatory Agency has not issued final regulations under the Industrial Fuel Use Act of 1978. The Applicant will continue to evaluate proposed and final regulations as they are issued, and will seek any exemptions

permitted by the regulations if such exemption is determined to be in the best interest of its customers and stockholders.

- B. None.
- C. None.
- D. W. F. McGuire, Principal Engineer.
- E. None.

INTERROGATORY NO. 17: With respect to the dredging required for providing docks on the San Bernard River to unload the reactor vessel, state the number of cubic yards of land or river bottom which will be removed and state the location where such spoil will be disposed of. Describe the nature of the area used for disposal (e.g., elevation, biota, type of soil, etc.).

ANSWER:

A. Response to this question was provided as an attachment to the letter dated May 17, 1979, Mr. W. F. McGuire (HL&P) to Mr. R. W. Froelich (NRC). TEXPIRG's counsel, James Scott, Jr., is listed as having received a copy of this letter and the attachments.

- B. None.
- C. W. F. McGuire, Principal Engineer.
- E. See response to 12E.

INTERROGATORY NO. 18: State the name and title of the highest-level (in terms of organizational hierarchy) company official who has read or is substantially familiar with the report on solid waste combustion completed on behalf of HL&P for the purpose of the NRC licensing.

ANSWER:

A. The Applicant has no knowledge of any report on solid waste combustion completed on behalf of HL&P for the purpose of NRC licensing.



B. None.

C. None.

D. W. F. McGuire, Principal Engineer.

E. The Applicant has retained Dr. Herb Woodson to testify on the subject of alternate energy sources, but Dr. Woodson has not completed any study on this subject.

INTERROGATORY NO. 19: Was the report mentioned in #18 prepared and completed prior to or after the company made the decision to build a nuclear power plant at Allens Creek? (include a statement of the relevant dates in the response.)

ANSWER:

A-E. See response to 18A-E.

INTERROGATORY NO. 20: In what month and year did HL&P reach agreement with General Electric Corporation to utilize a boiling water reactor designed by GE?

ANSWER:

A. HL&P signed a letter of intent to purchase a boiling water reactor designed by General Electric in March, 1973.

B. Letter of March 5, 1973, from A. R. Beavers to the General Electric Company (AC-HL-GE-209).

C. None.

D. P. A. Horn, Project Manager.

E. None.

INTERROGATORY NO. 21: At 9.2.1.3.4 of the Environmental Report, HL&P states that a coastal site near the Gulf of Mexico is too costly in order to deal with three factors mentioned in that sub-part. Provide the relevant cost estimates which provide a basis for that statement, the source of those estimates, and the proximate date on which the cost estimates were calculated.

ANSWER:

A. ACNGS ER Section 9.2.1.3.4 states: "A coastal site using sea water for cooling purposes is considered to be a viable alternative by HL&P. However, the disadvantages of such a site include:"

(a) Costs of providing adequate protection against flooding and hurricanes.

(b) Additional cost of mitigation of environmental impacts related to:

1. Diffuser
2. Intake pipes
3. Dredging
4. Siltation
5. Ecological Monitoring

Although the Applicant is not certain as to which three factors intervenor is requesting additional information, the cost estimates presented in Section 9.2.1.3.4 were prepared by Ebasco Services, Inc. in mid-1973.

B. ACNGS ER Section 9.2.1.3.4.

C. See response to 12c.

D. R. E. Fellman, Environmental Project Leader, Envirosphere, Inc.

E. Applicant has retained Teknekron Energy Resource Analysts (TERA) to prepare testimony related to Hinderstein Contention 5, and could develop information arguably related to this interrogatory.

In addition, Applicant does intend to present testimony by Donald R. Betterton which could address in some manner, as yet undetermined, the matters addressed in this response. Mr. Betterton is Manager of the Environmental Protection Department of Houston Lighting & Power Company. In this capacity, Mr. Betterton is ultimately responsible for all environmental studies and analyses conducted by the company or its consultants.

INTERROGATORY NO. 22: At 9.2.2.1.3 of the Environmental Report, an evaluation of W. A. Parish site, HL&P states:

"The present cooling pond, while generally considered unproductive, has been found to support catfish, gar, and alligator." (emphasis added) Both the NRC staff and HL&P conclude that ACNGS' cooling will be productive for recreational game-fish. What factors are responsible for the ACNGS pond being more productive than the Parish pond?

ANSWER:

A. Smithers Lake, the W. A. Parish cooling pond, has never been stocked or managed as a fishery, nor have any fishery habitat improvements been made in the pond. Therefore, it is expected that the lake would be dominated by catfish, gar and alligator; hence, the classification "unproductive." The Allens Creek lake is designed to provide fish habitat and will have a fishery management program.

B. None.

C. None.

D. Dr. F. G. Schlicht, Principal Scientist.

E. HL&P has no plans to present testimony concerning the productivity of Smithers Lake. However, Dr. Frank G. Schlicht and Dr. Lial Tischler are expected to present testimony concerning the productive capability and expected water quality parameters of the Allens Creek 5000-acre cooling lake.

INTERROGATORY NO. 23: Describe the present state of recreational usage of the cooling pond at W. A. Parish. Will the level of recreational usage be similar or different at ACNGS' pond? Please explain any basis for your statement.

ANSWER:

A. The Smithers Lake has never been used as a recreational water body. There are no plans to open the pond for recreation use in the future.

B. None.

C. None.

D. Dr. F. G. Schlicht, Principal Scientist.

E. Dr. Schlicht is expected to present testimony concerning the recreational use of the Allens Creek reservoir. It is not expected that any testimony will be presented concerning recreational use of Smithers Lake.

INTERROGATORY NO. 24: Was the airport proposal by Hou-West, Inc., and the predecessor developer, City of Katy, considered in HL&P's Environmental Report or alternative site comparisons? If so, where?

ANSWER:

A. No.

B. None.

C. None.

D. J. G. White, Supervising Engineer, HL&P.

E. The Applicant has no plans to present testimony specifically related to matters addressed in this interrogatory. However, the Applicant has retained Mr. Keith Woodard of Pickard, Lowe and Garrick, Inc., to prepare testimony related to probability of airplane crashes. It is conceivable that portions of Mr. Woodard's testimony could be related to this interrogatory.

INTERROGATORY NO. 25: Was underground siting considered as an alternative plant design? If not, why not?

ANSWER:

A. Applicant objects to this interrogatory on the grounds that TEXPIRG'S Acting Executive Director, John F. Doherty, represented to Applicant's counsel in his deposition under oath that TEXPIRG had dropped the underground siting portion of its Contention 6. Deposition of John F. Doherty, at 129, March 26, 1979. Hence, this interrogatory is not relevant to any persisting contention.

INTERROGATORY NO. 26: On page 9.3-2 of the Environmental Report, relative weightings are assumed in the comparisons of various environmental impacts. What is the basis and rationale underlying these ratings? For example, why is

"ecological sensitivity" half as important as "land use" in this system? And, why is "water use" half as important as "land use?"

ANSWER:

A. The "ratings" referenced in the Environmental Report were arrived at on the basis of the judgments of experts retained by Applicant who had expertise in determining the relative importance of the factors used in the weighting process. Applicant presumes differences in weighting given to ecological sensitivity, land use, and water use were based on the judgment of these experts.

B. "Coastal Sites Study for HL&P Company," dated January, 1973, prepared by Ebasco Services, Inc.

C. None.

D. W. F. McGuire, Principal Engineer.

E. See response to 6E.

INTERROGATORY NO. 27: Would the alternative site comparison have resulted in the same results if all the environmental impacts had been equally weighted?

ANSWER:

A. Applicant objects to answering a hypothetical question based on the unsupported conjecture that all environmental factors should be equally weighed. Applicant has not done such an analysis and does not believe it could be done on a rational basis because there is absolutely no rationale for giving equal weight to all ranking factors.

INTERROGATORY NO. 28: The Environmental Report clearly delineates that alternative sites were first "narrowed down" by considering water and likely watersheds. However, what methods and factors were used to determine which specific sites within a watershed would be compared as alternative sites?

ANSWER:

A. The sites described in Section 9.2.2 of the Environmental Report were determined to be sites that were



worthy of further considerations and evaluation under siting criteria established by the Nuclear Regulatory Commission, and these sites were so evaluated. The initial identification of these sites was derived from prior siting studies which have been produced to TEXPIRG for its inspection and copying.

- B. See response to 30A.  
ACNGS ER Section 9.2.2.
- C. None.
- D. W. F. McGuire, Principal Engineer.
- E. See response to 21E.

INTERROGATORY NO. 29: Explain the nature of "potential operating and reliability problems" associated with over-developing generating capacity on one side of the system, as mentioned at 9.2.1.2 of the ER.

ANSWER:

A. The potential operating and reliability problems mentioned in ER Section 9.2.1.2 are those which develop as a result of a large increase in generation facilities in a particular area without a corresponding increase in transmission capacities. In a situation where there is little excess transmission capacity and limited room for expansion, connection of additional generation would possibly require generation reductions during transmission interruptions or other abnormal operating periods.

- B. None.
- C. None.
- D. R. M. Delgado, Principal Engineer, HL&P.
- E. Applicant does intend to present testimony by Donald R. Betterton which could address in some manner, as yet undetermined, the matters addressed in this response.

INTERROGATORY NO. 30: During what month and year did HL&P first decide to locate a nuclear generating facility at Allens Creek? During what month and year were analyses completed for Section 9.2 of the Environmental Report?

ANSWER:

A. Ebasco Services, Inc. conducted two initial site studies for the Allen Creek site, titled:

1. "Preliminary Evaluation of the W. A. Parish Site, the Lower Mill Creek Site, the Scanlon Site and the Allens Creek Site for the Installation of Nuclear Fueled Generating Capacity", dated March, 1972.
2. "Nuclear Plant Site Comparison for Ranking Purposes for Houston Lighting & Power Company", dated July, 1972.

In addition, Dames & Moore prepared two reports concerning alternative sites analysis, titled:

1. "Preliminary Evaluation of the W. A. Parish, Lower Mill Creek, and Scanlon Sites for the Installation of Nuclear Fueled Generating Capacity, dated December 1971.
2. Report  
Preliminary Site Evaluations  
Lower Mill Creek  
Allens Creek  
Scanlon  
Proposed Nuclear Generating Station for  
Houston Lighting & Power Company, dated  
September, 1972.

On June 14, 1972 the Board of Directors authorized initiation of land acquisition. HL&P reached an agreement with General Electric to purchase a boiling water reactor in March, 1973. The construction permit application was submitted and accepted for docketing in August 1973. The analyses for ACNGS ER Section 9.2 were completed in mid-1973.

B. See response to 30A.

C. None.

D. D. R. Betterton, Manager, Environmental  
Protection Department

R. E. Fellman, Environmental Project Leader,  
Envirosphere, Inc.

E. See response to 6F.

INTERROGATORY NO. 31: At 10.5.3.2, of the ER, HL&P states:  
"Unfortunately, no ozonation plants exist of the type and  
scale required for the Allens Creek site, and thus, attendant  
safety and environmental features of such a system are  
questionable." Does this statement remain accurate at this  
point in time?

A. The Application has not made inquiries as to  
the size and type of ozonation plants presently available.  
However, during preparation of the ACNGS Environmental  
Report Supplement it was determined that the conclusions  
drawn in the ACNGS ER with respect to ozonation remain  
valid, i.e., that such a system will not be viable at the  
ACNGS.

B. ACNGS ER Supp., Section S10.5.1.

C. None.

D. R. E. Fellman, Environmental Project Leader,  
Envirosphere, Inc.

E. None.

INTERROGATORY NO. 32: Did HL&P communicate with manufacturers  
of various ozonation equipment prior to making the statement  
referred to in #31 above? If so, provide the names of the  
manufacturer, the means of communication, and the year it  
occurred. If not, what basis is provided for that statement?

A. Ebasco Services, Inc. contacted Unox Corporation  
by telephone in 1973 on behalf of the Applicant.

B. None.

C. None.

D. R. E. Fellman, Environmental Project Leader,  
Envirosphere, Inc.

E. None.

INTERROGATORY NO. 33: Will HL&P's proposed chlorine minimization study consider the possibility of ozonation?

A. The Applicant has no plans to evaluate alternatives to chlorine in the chlorine minimization study.

B. None.

C. None.

D. W. F. McGuire, Principal Engineer.

E. Dr. Frank G. Schlicht and Dr. Lial Tischler are expected to present testimony concerning the productive capability and expected water quality parameters of the Allens Creek 5000-acre cooling lake.

INTERROGATORY NO. 34: If copper sulfate treatment were used as an alternative to chlorination of the pond, what is the estimated concentration (in ppm) required within the pond?

A. The Applicant has not estimated concentrations in the cooling reservoir resulting from use of copper sulfate. Due to the toxicity problems discussed in ER Section 10.5.3.3, copper sulfate was excluded from consideration as a biocide.

B. ACNGS ER-CP, Section 10.5.3.3.

C. None.

D. R. E. Fellman, Envirosphere, Inc.

E. Not Applicable.

Respectfully submitted,

*C. Thomas Biddle Jr.*

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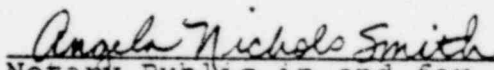
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HOUSTON LIGHTING & POWER COMPANY

STATE OF TEXAS       §  
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COUNTY OF HARRIS   §

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared W. F. McGuire, who upon his oath stated that he has answered the foregoing Houston Lighting & Power Company's Response to TEXPIRG'S Third Set of Interrogatories to Houston Lighting & Power Company in his capacity as Principal Engineer of the Environmental Protection Department for Houston Lighting & Power Company, and all statements contained therein are true and correct.

  
\_\_\_\_\_  
W. F. McGuire

SUBSCRIBED AND SWORN TO BEFORE ME by the said  
W. F. McGuire, on this 27th day of August, 1979.

  
\_\_\_\_\_  
Notary Public in and for  
Harris County, Texas

TB:03:A

ANGELA NICHOLS SMITH  
Notary Public in Harris County, Texas  
My Commission Expires October 13, 1980



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

HOUSTON LIGHTING & POWER COMPANY

(Allens Creek Nuclear Generating  
Station, Unit 1)

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Docket No. 50-466

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing  
Applicant's Response to TEXPIRG'S Third Set of Interrogatories  
in the above-captioned proceeding were served on the following  
by deposit in the United States mail, postage prepaid, or by  
hand-delivery this 27th day of August, 1979.

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C. Thomas Biddle, Jr.

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