

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

The Atomic Safety and Licensing Board

In the Matter of

HOUSTON LIGHTING AND POWER COMPANY

(ALLENS CREEK NUCLEAR GENERATING  
STATION)

DOCKET # 50-466 CP

THIRD SET OF INTERROGATORIES AND REQUESTS FOR INFORMATION  
TO THE STATE OF TEXAS BY TEXAS P.I.R.G.

TexPIRG, an intervenor in the above-styled proceeding, requests that the State of Texas, an interested state participating in this matter, produce the following information:

1. Has the Department of Highways and Mass Transportation surveyed or studied the transportation of flammable or hazardous substances on inter-state or state highways? If so, what are the reference titles for any reports or documents produced in those studies, and what is the name of the state employee having knowledge of those studies? Does that agency have any means of comparatively measuring the intensity or degree of vehicular traffic related to transporting flammable/hazardous substances on various highway routes? If so, what is the unit of measurement? What are the comparative statistics on the transportation of hazardous/flammable substances on highways in the vicinity of Allens Creek, compared to such traffic in the vicinity of Bay City?
2. Has the Railroad Commission published any studies or surveys with regard to the amount of flammable or hazardous substances transported by various rail routes? If so, what are the titles of such studies or surveys, and who is the state employee most knowledgeable of such studies? Compare the relative frequency or quantity of hazardous substances transported on the rail lines adjacent to Wallis, Texas, compared to rail lines in Bay City.
3. Please provide the documents containing long-range population projections for Fort Bend and Austin Counties utilized by the State Department of Highways and Mass Transportation in planning transportation facilities for those areas.
4. Does the Department of Highways and Mass Transportation project an increase in population in Brazoria County due to construction of the South Freeway from Houston to Freeport? What is the range of population increase projected?
5. What is the maximum capacity of IH-10 at (a.) junction of I-10 with Loop 610 in the northwest section of the Houston freeway system; (b.) the Katy exit or near there; and (c.) the Sealy exit or near there. What is the peak utilization of IH-10 at the above-mentioned points for (d.) five years ago; (e.) present time; (f.) 1990 (predicted) and (g.) 2000 (predicted)?

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6. Of the arterial routes for vehicular traffic joining or adjacent to IH-10 in Fort Bend and Austin Counties, which are experiencing the highest traffic utilization? What are those levels? Are any of those routes considered to be "congested" by the Department of Highways and Mass Transit?

7. What routes or streets in Katy, Texas carry the heaviest traffic flow at peak hours? What is the average speed of traffic on the heaviest used such roads during peak traffic hours? What is maximum speed of vehicular traffic permitted on each of those roads?

RESPECTFULLY SUBMITTED,

Clarence Johnson  
Executive Director, TexPIRG  
Box 237 UC, Univ. of Houston  
Houston, TX 77004

I, Clarence Johnson, herein certify that this request for information has been served on the individuals listed below by deposit in the U.S. mail system on Aug.\_\_\_\_, 1979.

Sheldon Wolfe  
E.L. Cheatum  
Gustave Linenberger  
Richard Lowerre  
J.G. Copeland  
R. Gordon Gooch  
Steve Sohinki  
John Doherty  
Carro Hinderstein  
Brenda McCorkle  
Wayne Rentfro  
Docketing and Service (20)

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1058 071

6. Of the arterial routes for vehicular traffic joining or adjacent to IH-10 in Fort Bend and Austin Counties, which are experiencing the highest traffic utilization? What are those levels? Are any of those routes considered to be "congested" by the Department of Highways and Mass Transit?

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