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U.S. NUCLEAR REGULATORY COMMISSION

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

In the Matter of Houston Lighting
and Power Company:
(Allens Creek Nuclear Generating
Station, Unit 1)

}
} Docket #50-466 CL
}

JOHN F. DOHERTY'S CONTENTION #40

John F. Doherty, Intervenor in the above proceeding, files this contention pursuant to 10 CFR 2.714 (a) (1) as a contention based on information not available previously.*

TEXT OF CONTENTION #40

Intervenor contends the Allens Creek site is unsuitable for the proposed nuclear plant, because the assumed fission product release from any accident considered credible will exceed the limitations of radioactivity dose to the low population zone stated in 10 CFR100.11, (a) (1), (2), and (3).

This Intervenor contends this because the actual release of radio-activity from the Three Mile Island accident exceeded calculated release for any accident considered credible by a factor of 22, using the calculation suggestions of Regulatory Guide 1.4.* The proposed ACNCS and Three Mile Island are sufficiently similar in design such that the miscalculation in the ill-fated reactor's case is the same for the subject of these proceedings, in regard to source terms, and other factors.

This contention is particularly relevant to ACNCS construction license proceeding because the Applicant's proposed NPSS will use the largest BWR core attempted, with the highest power core density, and greater minimum critical heat flux ratio than any functioning BWR plant. Construction of the plant at the proposed site will injure Intervenor's health and safety interest by exposing him to radiation in excess of the guidelines of 10 CFR 100.11.

* This information was available by a "Board Notification - TMI Releases (BN-79-23)," received Friday, July 13, 1979.

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