

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)



September 12, 1979

Docket No. 50-466

ADDITIONAL CONTENTIONS OF WILLIAM J. SCHUESSLER

In addition to the nine contentions filed in my amendment to petition for leave to intervene dated August 8, 1979, I wish to submit the following:

10. Applicant is the largest power company in the U.S. which does not inter-connect interstate with other power companies. Such inter-connecting power grids provide a capability of diverting electric power from one generating and distributing system to another to meet peak demands. ACNGS, operating at a projected 50% capacity factor would supply only 6% of HL&P's maximum peak load in 1979. NRC's own data show that large EWRs average less than 50% of their rated capacity due to down time. By inter-connecting with other utilities who have facilities outside Texas all of this power could be supplied without ACNGS being built. Gulf States Utilities, Arkansas Power & Light, El Paso Electric Co. and other utilities are nearby—companies that have power to sell to HL&P.

There are now hearings before the Federal Energy Regulatory Commission that will very likely require this inter-connection, thus avoiding any need to build ACNGS.

This alternative has not been sufficiently considered by either the applicant or the NRC Staff in their final Environmental Statements. I submit that inter-connection is environmentally preferable to building a large nuclear plant, and economically preferable for the customers.

11. Neither Applicant nor NRC Staff has given adequate consideration to coal or lignite as alternate energy sources. For example, Dr. Ralph E. Peck, Professor Emeritus of Chemical Engineering, Illinois Institute of Technology and Dr. Ladd Pircon, chemical engineer, have developed a practical scrubbing process that removes sulfur dioxide from coal combustion effluent and combines residue with other chemicals to produce high-grade fertilizer for agricultural use. In this process the sulfur dioxide is drawn through a newly invented "heterogeneous reactor" which combines the gas with water and calcium phosphate, releasing phosphorus, which combined with anhydrous ammonia and coal ash residue, forms fertilizer. The process has been tested for more than two years at Illinois Institute of Technology. During that test period amounts of sulfur dioxide leaving the stack were reduced by over 95%. Also, significant reductions in particulate matter leaving the stack were established. During

the tests, both high and low sulfur coals were used.

The system uses only a fraction of the energy needed for current methods. Cost of the system may run less than 30% of the cost of the best scrubber systems now used. Fertilizer produced in this process returns a profit resulting in lower rates for utility customers.

Utilities and major chemical companies are already taking an active interest in this process.

Another environmentally safe method of using coal or lignite (which is very plentiful in Texas) is to burn the lignite underground, where it is found. This eliminates strip mining and transportation problems, and greatly reduces emissions; making it environmentally preferable to nuclear power. Such underground burning is presently being done in Texas.

Recent revelations in regard to radiation hazards found in uranium mining, harmful effects of low level radiation generally, experience from TMI, all prove the obvious advantages of coal or lignite as an energy source, as opposed to nuclear energy.

12. HL&P has contracted to buy Austin's excess electricity in the amount of 500 MW per year. Also, HL&P has announced that it plans to build a 1500 MW capacity lignite plant north of Houston which will be in operation by 1986. Also, due to recently announced \$400 million overruns at the South Texas Plant, the cities of Austin and San Antonio have begun consideration of selling their project shares to HL&P.

The sale of Austin's 16% share and San Antonio's 28% share of power would make available almost 1200 MW to HL&P.

Also, the city of Houston is considering the burning of its municipal waste to generate steam in co-generation facilities that could generate 500 MW.

These alternate, already planned sources of power total 3700 MW, which would exceed by almost 300% the full rated capacity of 1200 MW of ACNGS. This much power available to HL&P clearly eliminates any need for ACNGS.

13. Because of:

- a) Recently announced cost overruns totalling over \$1.4 billion (140% overrun) on the South Texas Plant;
- b) Similar cost overruns may be reasonably expected at ACNGS;
- c) The expected financial losses related to pullout of STP by cities of Austin and San Antonio because of cost overruns;
- d) Expected increased costs of new safety requirements resulting from TMI disaster;
- e) Ever increasing cost of borrowing money (prime rate now 13%) along with the reduction of the bond rating of HL&P;
- f) Reasonable expectation that the Texas Public Utilities Commission will not allow HL&P's total 1979 rate increase request;

I contend that HL&P is, and will be unable to give reasonable assurance that

these conditions will not compromise the applicant's clear self-interest in safety, and meet the requirements of the construction permit.

14. Applicant has not adequately met requirements of 10 CFR 50, Appendix E, which reads in part;

The Preliminary Safety Analysis Report shall contain sufficient information to assure the compatibility of proposed emergency plans with . . . such considerations as access routes, surrounding population distributions, and land use.

I contend that any such information presently appearing in the PSAR must be regarded as false and misleading, rather than assuring. The State of Texas has legal responsibility for evacuation and other protective measures in event of an accident at ACNGS. If the State of Texas does in fact have such plans, they are totally unknown to the general public. The same is true of county and city governments, including those which would be affected by possible ACNGS accidents. Absent such plans, PSAR cannot contain information which would satisfy minimums required in paragraphs A through G of cited regulation. If such plans exist, it is extremely doubtful that they come close to incorporating all of the essential elements included in the "Guide and Checklist published by NRC.

In the event of a serious accident at ACNGS it would be most likely that immediate evacuation of densely populated Houston and Harris County would be necessary. Effective and timely removal of 2 to 3 million people to safety is simply not possible. To quote Civil Defense officials on the subject;

We try to evacuate this city each morning and evening. We call it rush hour. You know how effective that is.

Six days might provide enough time to evacuate the area, but not 72 hours deemed sufficient by federal planners.

Houston/Harris County being the fastest-growing metropolitan area in the country clearly indicates that building ACNGS will almost certainly place it in the very midst of the population which will have grown around it.

I contend the recently announced plans to require that low population zone will be extended to 10 miles, combined with the expected announcement of stronger requirements for evacuation planning in the wake of TMI investigations, will assure that it will be impossible for the Applicant to comply with 10 CFR 50, Appendix E.

15. Neither applicant nor NRC Staff has sufficiently considered the aesthetic impact of the huge, bloated energy station rising almost two hundred feet above the sightly, unspoiled grass-covered plains of southern Austin County. This massive unnatural, forbidding hulk will surely be an offensive intruder to the eyes of those many Texans who have enjoyed this scenic area for decades. This abominable structure will be visible for perhaps twenty miles, and will stand as a lamentable symbol of man's folly, totally out of place in this unique grassland area. Therefore, I contend that ACNGS should be built at a less aesthetically critical site, or be

constructed in a manner which will permit the area to remain unblemished by the plant. This could well be possible if a substantial part of the facility were to be built below ground level.

Respectfully submitted,

William J. Schuessler

William J. Schuessler
5810 Darnell
Houston, Texas 77074

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