

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



IN THE MATTER OF

HOUSTON LIGHTING AND
POWER COMPANY, ET AL.

(SOUTH TEXAS PROJECT,
UNITS 1 AND 2)

DOCKET NOS. 50-498
50-499

SUPPLEMENT TO CITIZENS FOR EQUITABLE UTILITIES
ORIGINAL PETITION

PURSUANT TO THE PREHEARING CONFERENCE ORDER RULING UPON INTERVENTION PETITIONS¹ CITIZENS FOR EQUITABLE UTILITIES, INC. (CEU) FILES THIS ITS SUPPLEMENT TO CEU'S ORIGINAL PETITION TO INTERVENE IN THE ABOVE CAPTIONED PROCEEDING.

CONTENTION 1.

THE SOUTH TEXAS PROJECT (STP) CATEGORY 1 STRUCTURES AND EQUIPMENT ARE INADEQUATELY DESIGNED ² AND CONSTRUCTED WITH RESPECT TO WIND LOADINGS AS DEMONSTRATED BY THE FACT THAT ACTUAL WIND VELOCITIES ASSOCIATED WITH HURRICANES WHICH HAVE OCCURRED ALONG THE TEXAS GULF COAST ³ HAVE EXCEEDED

1/ Order April 3, 1979 p.53

2/ 10 CFR Part 50, Appendix A, Criterion 2

3/ Texas Coastal and Marine Council, Pictorial Atlas of Texas Coastal Hazards, Appendix A, January 1977

Henry, Walter K., Dennis M. Driscoll, J. Patrick McCormack
Hurricanes on The Texas Coast, Texas A. & M. University,
Center for Applied Geosciences, College of Geosciences,
July 1975, TAMU SG 75 504

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WIND LOADINGS FOR WHICH STP STRUCTURES HAVE BEEN DESIGNED AND EVALUATED. FURTHER THERE ARE NON-CATEGORY 1 STRUCTURES CONTAINING EQUIPMENT WHICH IF DESTROYED OR DAMAGED WOULD JEOPARDIZE THE SAFE OPERATION OF STP. THESE NON-CATEGORY 1 BUILDINGS ARE NOT DESIGNED TO WITHSTAND WINDS GENERATED BY HURRICANES AND IF DAMAGED WOULD PROVIDE MISSILE TYPE PROJECTILES WHICH COULD PENETRATE CATEGORY 1 STRUCTURES WHICH ARE INADEQUATELY PROTECTED.

CONTENTIONS 2 & 3.

INFORMATION⁴ WHICH IS AVAILABLE DEMONSTRATES THAT THE EFFECTS OF DISCHARGES OF PLANT EFFLUENTS INTO LITTLE ROBBINS SLOUGH AND THE COOLING LAKE WILL ADVERSELY AFFECT AQUATIC ORGANISMS IN THE FOOD CHAIN.

CONTENTION 4 WITHDRAWN

CONTENTION 5.

STAFF AND APPLICANT CALCULATIONS OF RADIONUCLIDE DEPOSITION RATES DO NOT TAKE INTO ACCOUNT THE RELATIVELY HIGH AND CONTINUAL HUMIDITY IN THE AREA OF STP TO DETERMINE COMPLIANCE WITH 10 CFR PART 50, APPENDIX I.⁵

CONTENTION 6.

MILK PRODUCING ANIMALS WILL BE RESTRICTED WITHIN A 5 MILE RADIUS OF STP, AND AS A RESULT, APPLICANT WILL NOT BE ABLE TO COMPLY WITH 10 CFR 50, APPENDIX I.

4/ Chapman, Rice and Price, Uptake and Accumulation of Radioactive Zinc by Marine Plankton, Fish and Shellfish, U. S. Fish and Wildlife Service Bulletin 135, Vol. 58, p.279-92.

Chapman, Rice and Baptist, Ecological Aspects of Radioactivity in the Marine Environment, Environmental Radiation Symposium, Johns Hopkins University, p. 107 - 80

J. Martin Brown, Health, Safety and Social Issues of Nuclear Power, in W. C. Reynolds, ed. The California Nuclear Initiative; Analysis and Discussion of the Issues, (Institute for Energy Studies, Stanford University, 1976.)

John Goffman, Arthur Templin, Poisoned Power, (p. 139, Cesium 137 in aquatic organisms that make up the food chain).

5/ Agreement of May 9, 1979, meeting with Applicant and M.R.C. Staff.

CONTENTION 7.

DUE TO SOIL CONDITIONS PECULIAR TO THIS AREA,⁶ INADEQUATE WATER FLOW IN THE COLORADO RIVER AND DIMINISHING GROUNDWATER SUPPLY, APPLICANT WILL NOT BE ABLE TO MAINTAIN THE 7,900 ACRE COOLING POND AT A SUFFICIENT LEVEL TO ALLOW CONTINUED SAFE OPERATION OF STP.

CONTENTION 8.

PROPOSED AMENDMENTS OF 10 CFR 50, APPENDIX E, 43 FED. REG. 37473, AUGUST 23, 1978, ARE TO BE USED AS INTERIM GUIDANCE EVALUATING, INTER ALIA, APPLICATIONS FOR OPERATING LICENSES. SUCH AMENDMENTS REQUIRE THAT EMERGENCY PLANS MUST, IN DEFINED CIRCUMSTANCES, EXTEND, AS APPROPRIATE, TO AREAS BEYOND THE LPZ. SUCH REQUIREMENTS ARE APPLICABLE IN THE CASE OF STP BECAUSE OF THE FOLLOWING:

(A) MATAGORDA ELEMENTARY SCHOOL WITH AN ENROLLMENT OF MORE THAN 80 STUDENTS, WHICH IS APPROXIMATELY 8 MILES FROM STP IN A SOUTH-SOUTHEASTERLY DIRECTION, WOULD HAVE TO TRAVEL TOWARDS STP IN ORDER TO EVACUATE SINCE THE ONLY EVACUATION, STATE HIGHWAY 60, ENDS IN MATAGORDA.

(B) AT THE END OF STATE HIGHWAY 60 IN MATAGORDA THERE BEGINS A SECONDARY ROAD, 2031, WHICH CROSSES THE INTRACOASTAL CANAL AND CONTINUES 6.6 MILES DOWN THE PENINSULA, ENDING ON THE GULF. THERE ARE NUMEROUS RESIDENTS IN THESE AREAS WHO HAVE NO OTHER ROUTE THAN HIGHWAY 60 FOR EVACUATION.

6/ Soil Surveys, Texas Agricultural Extension Service,
Texas A. & M. University.

McGowan, J. H. and J. L. Brewton, Historical Changes and
Related Coastal Processes, Gulf and Mainland Shorelines,
Matagorda Bay Area, Texas, University of Texas at Austin,
Bureau of Economic Geology.

University of Texas Report of Investigations - 85,
Lineations and Faults in The Texas Coastal Zone T-31-RI-85

Report on the Colorado River System, Texas Department
of Water Resources.

(C) THE EVACUATION PLAN FORMULATED BY THE TEXAS DEPARTMENT OF PUBLIC SAFETY IS ONLY "IN CASE OF NUCLEAR WAR." AN UNCOMPLETED PLAN BY THE TEXAS HEALTH DEPARTMENT WOULD NOT APPLY TO MATAGORDA AS IT ONLY COVERS A 5-MILE L.P.Z.

ACCORDINGLY, THE STP EMERGENCY PLAN DOES NOT CONFORM TO THE REQUIREMENTS OF THE ABOVE REFERENCED PROPOSED AMENDMENTS TO 10 CFR 50, APPENDIX E WHICH ARE CURRENTLY EFFECTIVE AS INTERIM GUIDELINES.

CONTENTION 9.

EXAMPLES OF CONSTRUCTION DEFICIENCIES WHICH MAY OR MAY NOT BE CORRECTABLE AND VIOLATIONS OF 10 CFR PART 50 WHICH HAVE A DIRECT BEARING ON THE HEALTH AND SAFETY OF CEU MEMBERS ARE AS FOLLOWS:

(A). FALSIFICATION OF DOCUMENTS, INSPECTION AND ENFORCEMENT ACTIVITY REPORT (I. & E.) 77-03 OF FEBRUARY, 1977 (2/77) -- I. & E. #77-03 OF 4/77 --AND I. & E. # 78-08 OF 5/78. VIOLATION OF 10 CFR 50, APPENDIX B, XIV.

(B). USE OF UNQUALIFIED PERSONNEL, I. & E. 77-01, 77-04 AND 77-08. VIOLATION OF 10 CFR 50, APPENDIX B, CRITERION II, V AND VII..

(C). NO AUDIT OF DESIGN REVIEW, I. & E. 77-08 AND 77-13. VIOLATION OF 10 CFR 50 CRITERION XVIII.

(D). CONTAINMENT LINER INFRACTIONS, I. & E. 77-01 AND 78-07. VIOLATION OF 10 CFR 50, APPENDIX B, CRITERION VI AND IX

(E) FAILURE TO FOLLOW APPROVED PROCEDURES, I. & E. 78-15 AND 78-17. VIOLATION OF 10 CFR 50, APPENDIX B, CRITERION V.

(F). FAILURE TO PROVIDE ACCEPTANCE CRITERIA, I. & E. 78-15 AND 78-17. VIOLATION OF 10 CFR 50 APPENDIX B, CRITERION V.

(G). NONCOMPLIANCE RELATING TO CADWELD ACTIVITIES, WELD DEFECTS AND INADEQUATE WELDING TECHNIQUES, AND FAILURE TO FOLLOW CADWELD PROCEDURES, I. & E. 77-05, 77-06, 77-13 AND 78-16. VIOLATION OF 10 CFR 50, APPENDIX B, CRITERION V, VIII, XIII AND 10 CFR Part 50.55 (e).

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(H). FAILURE TO PROVIDE REVISED DRAWINGS, I. & E. 78-08. VIOLATION OF 10 CFR 50, APPENDIX B, CRITERION VI.

(I). FAILURE TO PROVIDE IN-PROCESS INSPECTION, I. & E. 78-15 AND 78-16. VIOLATION OF 10 CFR 50, APPENDIX B, CRITERION X, AND 10 CFR PART 50.55 (e).

(J). EXAMPLES OF OTHER VIOLATIONS OF 10 CFR 50.55(e) ARE AS FOLLOWS:

1. STEEL LEFT OUT OF CONTAINMENT.
2. VOIDS IN CONCRETE OF CONTAINMENT BUILDING.
3. WATERPROOF MEMBRANE RUPTURE BELOW GROUND LEVEL.
4. 4. NON-COMPLIANCE OF STEEL PLATES IN CONTAINMENT LINER.

C.E.U. WOULD LIKE TO EXPRESS OUR APPRECIATION OF THE SPIRIT OF COOPERATION DISPLAYED BY THE N. R. C. STAFF AND THE APPLICANT DURING THE MEETING THAT WAS HELD ON MAY 9, 1979.

THE FOREGOING CONTENTIONS ARE RESPECTFULLY SUBMITTED FOR YOUR REVIEW AND COMMENTS.

Mrs Peggy Buchorn
MRS. PEGGY BUCHORN, EXECUTIVE DIRECTOR
CITIZENS FOR EQUITABLE UTILITIES, INC.
ROUTE 1 BOX 432
BRAZORIA, TEXAS 77422

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF

HOUSTON LIGHTING AND
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SOUTH TEXAS PROJECT
(UNITS 1 & 2)

DOCKET NOS. 50-498
50-499

SUPPLEMENT TO CITIZENS FOR EQUITABLE UTILITIES, INC. ORIGINAL
PETITION IN COMPLIANCE WITH BOARD ORDER, APRIL 3, 1979

PURSUANT TO THE REQUEST OF THE BOARD IN THE PREHEARING CONFERENCE
ORDER RULING ON INTERVENTION PETITIONS¹ (ORDER), CITIZENS FOR EQUITABLE
UTILITIES, INC. (CEU) RESPECTFULLY SUBMITS THE FOLLOWING.

PART 1

CONTENTION 1

THE SOUTH TEXAS PROJECT (STP) CATEGORY 1 STRUCTURES AND EQUIPMENT
ARE INADEQUATELY DESIGNED² AND CONSTRUCTED WITH RESPECT TO WIND LOADINGS
AS DEMONSTRATED BY THE FACT THAT ACTUAL WIND VELOCITIES ASSOCIATED WITH
HURRICANES WHICH HAVE OCCURRED ALONG THE TEXAS GULF COAST³ HAVE EXCEEDED

1/ Order pp. 53-65

2/ 10 CFR Part 50, Appendix A, Criterion 2

3/ Texas Coastal and Marine Council, Pictorial Atlas of
Texas Coastal Hazards, Appendix A, January 1977.

Henry, Walter K., Dennis M. Driscoll, J. Patrick McCormack,
Hurricanes on The Texas Coast, Texas A. & M. University,
Center for Applied Geosciences, College of Geosciences,
July 1975, TAMU SG 504

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WIND LOADINGS FOR WHICH STP STRUCTURES HAVE BEEN DESIGNED AND EVALUATED.⁴
FURTHER, THERE ARE NON-CATEGORY 1 STRUCTURES CONTAINING EQUIPMENT WHICH
IF DAMAGED OR DESTROYED WOULD JEOPARDIZE THE SAFE OPERATION OF STP.
THESE NON-CATEGORY 1 STRUCTURES ARE NOT DESIGNED TO WITHSTAND WINDS GENERATED
BY HURRICANES AND, IF DAMAGED, WOULD PROVIDE MISSILE TYPE PROJECTILES WHICH
COULD PENETRATE CATEGORY 1 STRUCTURES WHICH ARE INADEQUATELY PROTECTED.
CONTENTION 5.

STAFF AND APPLICANT CALCULATIONS OF RADIONUCLIDE DEPOSITION RATES DO
NOT TAKE INTO ACCOUNT THE RELATIVELY HIGH AND CONTINUAL HUMIDITY IN THE
AREA OF STP TO DETERMINE COMPLIANCE WITH 10 CFR PART 50, APPENDIX I.⁵

PART 2

IN ORDER TO SIMPLIFY THE ISSUES AT HAND AND EFFECTUATE NO UNDUE
BURDEN ON THE RECORD IN THESE PROCEEDINGS, CEU PROPOSES TO COMBINE
CONTENTIONS 2 AND 3, AND WISHES TO WITHDRAW CONTENTION 4. ADDITIONALLY,
CEU WILL ATTEMPT IN THIS SECTION TO FURTHER CLARIFY THE REMAINING CONTENTIONS.
CONTENTION 2-3.

INFORMATION⁶ WHICH IS AVAILABLE DEMONSTRATES THAT THE EFFECTS OF
DISCHARGES OF PLANT EFFLUENTS INTO LITTLE ROBBINS SLOUGH AND THE COOLING
LAKE WILL ADVERSELY AFFECT AQUATIC ORGANISMS IN THE FOOD CHAIN.

⁴/ Sec. 2.3 - PSAR and Sec. 2.3.2 - SER

⁵/ Agreement of May 9, 1979, meeting with Applicant and
N.R.C. Staff.

⁶/ Toombs, George L. and Culter, Peter B., Lower Columbia River
Environmental Radiological Survey in Oregon, contracted by the
U. S. Public Health Service and Oregon State Board of Health.

Bryeitung, _____, The Nuclear Dilemma, Ballentine Press.

Eicholtz, Geoffrey, Environmental Aspects of Nuclear Power,
published by Ann Arbor Sciences. 1976

continued next page

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DISCUSSION

THE MOST SIGNIFICANT EFFECTS OF RADIOACTIVE DISCHARGES TO THE AQUATIC ENVIRONMENT COME NOT FROM DIRECT DISCHARGES BUT FROM BIOLOGICAL CONCENTRATIONS OF RADIOACTIVE MATERIALS BY AQUATIC ORGANISMS. TO GIVE SOME EXAMPLES, THE OREGON STATE BOARD OF HEALTH IN A SURVEY OF THE LOWER COLUMBIA RIVER FOUND CONCENTRATIONS OF ZINC-65 IN OYSTERS, CLAMS, CRABS AND SEAWEED, TO BE 7,000 TIMES THAT OF RIVER WATER. THE REPORT NOTES "READILY APPARENT CONCENTRATIONS OF ZINC-65, MANGANESE-54 AND COBALT-60 WERE OBSERVED IN ALGAE EVEN WHEN THE PRESENCE OF THESE RADIONUCLIDES IN THE AMBIENT WATER WAS BELOW DETECTABLE LEVEL."

SEVERAL MORE EXAMPLES OF THIS KIND OF RADIONUCLIDE DEPOSITION ARE AVAILABLE IN LITERATURE. BRYEITONG IN "NUCLEAR DILEMMA", PAGE 48, GIVES VALUES OF PLANKTON CONCENTRATIONS OF RADIONUCLIDES 2,000 TIMES THAT OF RIVER WATER, FISH FEEDING ON THESE PLANKTON WITH 15,000 TIMES THAT OF RIVER WATER, SWALLOWS FEEDING ON INSECTS FROM THE RIVER 500,000 TIMES GREATER THAN RIVER WATER AND WATER FOWL HAVING A MILLION TIMES GREATER CONCENTRATION OF RADIOACTIVE NUCLIDES THAN THAT FOUND IN THE WATER. A MORE EXTENSIVE LIST OF BIO - ACCUMULATIONS THAT EXIST ARE FOUND IN TABLE 96 IN "ENVIRONMENTAL ASPECTS OF NUCLEAR POWER" BY GEOFFREY EICHOLTZ, WHO WAS PHYSICS PROFESSOR OF NUCLEAR ENGINEERING AT GEORGIA INSTITUTE OF TECHNOLOGY.

6/ Continued

Chapman, Rice and Price, Uptake and Accumulation of Radioactive Zinc by Marine Plankton, Fish and Shellfish, U. S. Fish and Wildlife Service Bulletin 135, Vol. 58, pp 279-92.

Chapman, Rice and Baptist, Ecological Aspects of Radioactivity in The Marine Environment, Environmental Radiation Symposium, Johns Hopkins University. pp. 107-80

Brown, J. Martin, Health, Safety and Social Issues of Nuclear Power, in W. C. Reynolds, ed. The California Nuclear Initiative: Analysis and Discussion of the Issues, (Institute for Energy Studies, Stanford University, 1976.)

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DR. EICHOLTZ REPORTS "A LARGE PROPORTION OF RADIOACTIVE LIQUIDS HAS BEEN RECONCENTRATED IN SEABED SILT AND SEDIMENT RESULTING IN SOME SIGNIFICANTLY HIGHER DOSE RATES TO BENTHIC AND DEMERSAL ORGANISMS, SUCH AS BOTTOM FEEDING FLAT FISH, THAN THE NATURAL BACKGROUND."

"IN VIEW OF THE IMPORTANCE OF SEAFOOD IN THE HUMAN DIET, A CAREFULL ASSESSMENT MUST BE MADE OF THE CONTRIBUTION OF AQUATIC PATHWAY TO THE POPULATION DOSE. BECAUSE SHELLFISH HAVE THE ABILITY TO SELECTIVELY CONCENTRATE A NUMBER OF RADIONUCLIDES NORMALLY FOUND IN THE REACTORS LIQUID EFFLUENTS, THEY ARE VERY SENSITIVE INDICATORS OF THE CONCENTRATION OF THESE RADIONUCLIDES IN WATER AND SHOULD BE SAMPLED AND ANALYZED TO DETERMINE IF THEY EXCEED PERMISSABLE CONCENTRATION GUIDELINES. IN SOME CASES THEY ARE THE CRITICAL VECTOR FOR TRANSPORTING THE RADIOACTIVITY FROM THE LIQUID EFFLUENTS VIA THE FOOD CHAIN TO MAN."

CONTENTION 6.

MILK PRODUCING ANIMALS WILL BE PASTURED WITHIN A 5 MILE RADIUS OF STP AND AS A RESULT, APPLICANT WILL NOT BE ABLE TO COMPLY WITH 10 CFR 50 APPENDIX I.

DISCUSSION

IT IS A COMMON PRACTICE AMONG FARMERS AND RANCHERS IN THIS AREA TO KEEP DAIRY COWS SUCH AS JERSEYS, BROWN SWISS AND GUERNSEYS FOR UTILIZATION AS NURSE COWS. SOME OF THESE ARE MILKED FROM TIME TO TIME AND THE MILK IS CONSUMED IN THE HOMES. THESE NURSE COWS ARE USED TO RAISE ORPHANED OR BOUGHT BABY CALVES WHICH USUALLY ARE SLAUGHTERED PRIOR TO WEANING, THE MEAT BEING CONSUMED BY THE OWNERS. IT WOULD INDEED BE UNUSUAL IF THE APPLICANT HAD BEEN ABLE TO LOCATE THESE COWS AS THEY ARE GENERALLY NOT CONSIDERED WHEN CALCULATING THE COW-MILK PATHWAY FOR RADIATION EXPOSURE LEVEL. THE FARMERS AND RANCHERS DO NOT CONSIDER THESE AS PRIMARILY DAIRY COWS AND CONSEQUENTLY ARE DISREGARDED.

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CONTENTION 7

DUE TO SOIL CONDITIONS PECULIAR TO THIS AREA, INADEQUATE WATER FLOW IN THE COLORADO RIVER AND DIMINISHING GROUNDWATER SUPPLY,² APPLICANT WILL NOT BE ABLE TO MAINTAIN THE 7,000 ACRE COOLING POND AT A SUFFICIENT LEVEL TO ALLOW CONTINUED SAFE OPERATION OF STP.

DISCUSSION

DUE TO THE EXTREME UNCERTAINTY OF THE SOIL STRATA IN AN AREA AS LARGE AS THAT WHICH THE COOLING POND COVERS, AND THE PROBABILITY THAT THERE ARE NUMEROUS POCKETS OF SAND, SUCH AS QUICKSAND, IT IS CLEAR THAT THERE IS A PROBABILITY, ALMOST A CERTAINTY, THAT THE WATER IN THE COOLING LAKE WILL NOT BE CONTAINED BUT WILL BE DRAWN DOWN INTO THE LOWER STRATAS FASTER THAN CAN BE MADE UP BY PUMPING FROM THE COLORADO RIVER, GIVEN THE PRESENTLY CALCULATED FLOW AS PERMITTED BY APPLICANTS PERMIT.

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PROPOSED AMENDMENTS OF 10 CFR 50, APPENDIX E, 43 FED. REG. 37473, AUGUST 23, 1978, ARE TO BE USED AS INTERIM GUIDANCE EVALUATED BY THE AEC. LIA, APPLICATIONS FOR OPERATING LICENSES. SUCH AMENDMENTS REQUIRE THAT EMERGENCY PLANS MUST, IN DEFINED CIRCUMSTANCES, EXTEND, AS APPROPRIATE, TO AREAS BEYOND

²/ Texas Coastal Management Program, Report on The Colorado River System, Department of Water Resources

Soil Surveys, Texas Agricultural Extension Service, Texas A. & M. University.

McGowan, J. H. and J. L. Brewton, Historical Changes and Related Coastal Processes, Gulf and Mainland Shorelines, Matagorda Bay Area, Texas, University of Texas at Austin, Bureau of Economic Geology.

University of Texas Report of Investigations - 85, Lineations and Faults in the Texas Coastal Zone T-31-RI-85

Department of Water Resources, Water Development Board Reports 91-163

332 092

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(A) MATAGORDA ELEMENTARY SCHOOL WITH AN ENROLLMENT OF MORE THAN 80 STUDENTS, WHICH IS APPROXIMATELY 8 MILES FROM STP IN A SOUTH-SOUTHEASTERLY DIRECTION, WOULD HAVE TO TRAVEL TOWARDS STP IN ORDER TO EVACUATE SINCE THE ONLY EVACUATION, STATE HIGHWAY 60, ENDS IN MATAGORDA.

(B) AT THE END OF STATE HIGHWAY 60 IN MATAGORDA THERE BEGINS A SECONDARY ROAD 2031, WHICH CROSSES THE INTRACOASTAL CANAL AND CONTINUES 6.6 MILES DOWN THE PENINSULA, ENDING ON THE GULF. THERE ARE NUMEROUS RESIDENTS IN THESE AREAS WHO HAVE NO OTHER ROUTE THAN HIGHWAY 60 FOR EVACUATION.

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Mrs Peggy Buckorn
MRS. PEGGY BUCKORN, EXECUTIVE DIRECTOR
CITIZENS FOR EQUITABLE UTILITIES, INC.
ROUTE 1 BOX 432
BRAZORIA, TEXAS 77422

UNITED STATES OF AMERICA
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IN THE MATTER OF

HOUSTON LIGHTING AND POWER
COMPANY, ET AL.

(SOUTH TEXAS PROJECT, UNITS 1 & 2)

DOCKET NOS. 50-498
50-499

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT COPIES OF THE ATTACHED DOCUMENT BY CITIZENS FOR
EQUITABLE UTILITIES, INC. WERE SERVED ON THE FOLLOWING BY DEPOSIT IN THE
UNITED STATES MAIL THIS THE 29^d DAY OF May, 1979.

CHARLES BECHHOEFER, ESQ., CHAIRMAN
ATOMIC SAFETY AND LICENSING BOARD
U. S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DR. JAMES C. LAMB, III
313 WOODHAVEN ROAD
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332 100

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ATOMIC SAFETY AND LICENSING APPEAL BOARD
U. S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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DOCKETING AND SERVICE SECTION
OFFICE OF THE SECRETARY OF THE COMMISSION
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WASHINGTON, D. C. 20555

Mrs Peggy Buckhorn