

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	\$	
	\$	
HOUSTON LIGHTING & POWER COMPANY	\$	Docket No. 50-466
	\$	
(Allens Creek Nuclear Generating	\$	
Station, Unit 1)	\$	

APPLICANT'S RESPONSE TO
"MORE CONTENTIONS SUBMITTED BY
F. H. POTTHOFF III"

Applicant files this response to a document received on June 8, 1979, from the Office of the Secretary and styled "More Contentions Submitted by F. H. Potthoff III." This document seeks admission of two additional contentions dealing respectively with conservation (V.) and a biomass production alternative (VI.).

Contention V. is quite clearly based on a document post dating the Appeal Board's decision affirming the Partial Initial Decision in this matter and, as such, could have been advanced in response to the Board's Order of September 11, 1978. It is thus outside the permissible scope of additional contentions as set forth in the Board's Order of April 11, 1979. Moreover, the contention alleges nothing with respect to the applicability on Applicant's system of a conservation

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program developed for a Pacific Northwest load center. Finally, Petitioner would have the Board believe that conservation was dismissed in one sentence in the FES. This is incorrect and misleading. Conservation of all types is discussed extensively in the SFES (pp. S.8-12 to S.8-15) and Petitioner fails to identify in what respect, if any, this analysis is incorrect. The contention should be dismissed.

Contention VI. relates to a biomass generating alternative. It is based on a document for which no date or specific citation is supplied. Beyond the very vague reference to what appears to be a general study of the subject, the contention boils down to the broadside assertion that "I contend building and operating a marine biomass farm, or other biomass production systems, would be environmentally preferable to ACNGS, and ask the Board to deny the permit under the NEPA." There is absolutely no description of a "biomass farm" nor any detail with respect to the meaning of "other biomass production systems." Further, there is no allegation that such biomass generating alternative could be available within the time frame needed for ACNGS. The contention is thus impermissibly vague. Moreover, it fails to controvert the detailed Staff review of biomass set out at page S.9-7 of the SFES. Accordingly, the contention should be denied.

Respectfully submitted,

J. Gregory Copeland

OF COUNSEL:

BAKER & BOTTS
3000 One Shell Plaza
Houston, Texas 77002

LOWENSTEIN, NEWMAN, REIS,
AXELRAD & TOLL
1025 Connecticut Ave., N.W.
Washington, D. C. 20036

J. Gregory Copeland
C. Thomas Biddle, Jr.
Charles G. Thrash, Jr.
3000 One Shell Plaza
Houston, Texas 77002

Jack R. Newman
Robert H. Culp
1025 Connecticut Ave., N.W.
Washington, D. C. 20036

ATTORNEYS FOR APPLICANT
HOUSTON LIGHTING & POWER COMPANY

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CERTIFICATE OF SERVICE

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Steve Sohinki, Esq.
Staff Counsel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

John F. Doherty
4438 1/2 Leeland
Houston, Texas 77023

Madeline Bass Framson
4822 Waynesboro Drive
Houston, Texas 77035

Robert S. Framson
4822 Waynesboro Drive
Houston, Texas 77035

Carro Hinderstein
8739 Link Terrace
Houston, Texas 77025

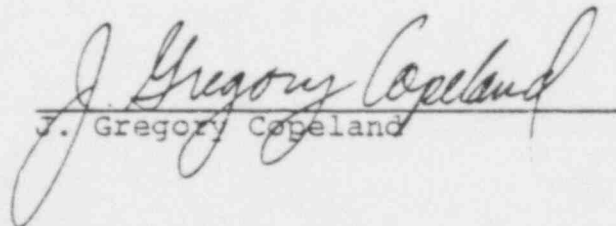
D. Marrack
420 Mulberry Lane
Bellaire, Texas 77401

Brenda McCorkle
6140 Darnell
Houston, Texas 77074

F. H. Potthoff, III
1814 Pine Village
Houston, Texas 77080

Wayne E. Rentfro
P. O. Box 1335
Rosenberg, Texas 77471

James M. Scott, Jr.
8302 Albacore
Houston, Texas 77074


J. Gregory Copeland

420 188