



UNITED STATES OF AMERICA
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)

X
X
X
X
X
X
X

Docket Nos. 50-466
50-467

RESPONSE TO INTERROGATORIES
TO THE STATE OF TEXAS FROM TexPIRG

The State of Texas now files this response to the Interrogatories to the State of Texas from TexPIRG of April 2, 1979. While the State of Texas does not acknowledge a legal responsibility to respond to interrogatories since Texas is participating as an interested state only, the State of Texas will attempt to assist any party to this proceeding by answering reasonable interrogatories relevant to the contentions.

INTERROGATORY NO. 1. List and make available any documents that relate to the productivity of fisheries in water as hot as expected at Allens Creek Lake?

RESPONSE TO INTERROGATORY NO. 1. (a) List of documents related to the productivity of fisheries of lakes where the temperature is in range expected to be found at the Allens Creek Reservoir is attached to these interrogatories as Appendix "A". (b) See Appendix "A". (c) Response to this interrogatory was compiled by Robert Bounds of the Fisheries Division of the Parks and Wildlife Department, 4200 Smith School Road, Austin, Texas, Area Code 512/ 475-4931.

7908080072 502 240

INTERROGATORY NO. 2. Have any new parks been acquired by the State of Texas since 1974 that are within 150 miles of the Allens Creek site? What are their names? Where are they located? How many acres are in each? Are there water related facilities such as streams or lakes in each?

RESPONSE TO INTERROGATORY NO. 2. (a) Yes. Land for parks has been acquired at the following locations:

Hill Ranch in Fort Bend County near Rosenberg, Texas. Park will contain 1, 897 acres and a series of oxbow lakes suitable for fishing.

Palmetto Bend near Edna, Texas, in Jackson County. Five Hundred Seventy-Five acres of land adjacent to the Palmetto Bend Reservoir have been acquired for a state park.

Bryan Beach south of Freeport in Brazoria County. Five Hundred and Nine acres of land have been acquired adjacent to the Gulf of Mexico.

Bastrop State Park in Bastrop County, Texas. Additional land has and is being acquired as part of the Bastrop State park.

(b) None. (c) Mark Gosdin with the Parks Planning Division of the Parks and Wildlife Department, 4200 Smith School Road, Austin, Texas, Area Code 512, 475-4995.

INTERROGATORY NO. 3. What evidence does the State have since the Three Mile Island accident in Pennsylvania that it is wise, safe, prudent, economic and reasonable to build large nuclear reactors near large cities such as Houston?

RESPONSE TO INTERROGATORY NO. 3. Respondent is now aware of information that would be relevant to Interrogatory No. 3.

INTERROGATORY NO. 4. What fish do the state plan to stock in Allens Creek Lake that can live and produce under the conditions expected to be present in the Allens Creek Lake?

RESPONSE TO INTERROGATORY NO. 4. (a) The following fish may be stocked in the Allens Creek Reservoir:

Large mouth bass
Channel Catfish
Whitenead catfish
Blue catfish
Hybrid striped bass
Striped bass

The Hybrid striped bass and Striped bass are not likely to reproduce in the Allens Creek Lake. Reproduction by the large mouth bass and blue cat may be limited. (b) None. (c) List was compiled by Robert Bounds. See Response to Interrogatory No. 1. (c).

INTERROGATORY NO. 5. What documents or other evidence does the state have that indicates that the reactor vessel can be bought to the site without significant environmental impact?

RESPONSE TO INTERROGATORY NO. 5. (a) None. (b) None. (c) Mr. B. D. King of the Fisheries Division of the Texas Parks and Wildlife Department, 4200 Smith School Road, Austin, Texas, Area Code 512, 475-4831.

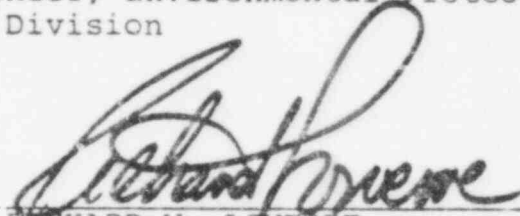
Respectfully submitted,

MARK WHITE
Attorney General of Texas

JOHN W. FAINTER, JR.
First Assistant Attorney General

TED L. HARTLEY
Executive Assistant Attorney General

DOUGLAS G. CAROOM
Assistant Attorney General
Chief, Environmental Protection
Division

A handwritten signature in dark ink, appearing to read "Richard W. Lowerre", is written over a horizontal line.

RICHARD W. LOWERRE
Assistant Attorney General

P. O. Box 12548, Capitol Station
Austin, Texas 78711
Ac 512/ 475-4143

52-13

APPENDIX A TO THE RESPONSE TO
INTERROGATORIES TO THE STATE OF TEXAS FROM TexPIRG

REPRODUCTION REPRESSION OF LARGE MOUTH BASS IN HEATED RESERVOIR
by W. J. Dean and W. H. Bailey of Texas Parks & Wildlife
Department, Inland Fisheries Department, Austin, Texas
71977

FINAL REPORT AS REQUIRED BY FEDERAL AID AND FISHERIES RESTORA-
TION ACT.

Objective XVI: Evaluation of Predator Fish Introduction,
Research Leader: Paul S. Crandell, Texas Parks & Wildlife
Department, Dec. 31, 1978.

FINAL REPORT AS REQUIRED BY FEDERAL AID AND FISHERIES RESTORA-
TION ACT:

Objective XXVIII: Evaluation of Multi-predator intro-
duction, Research Leader: Richard W. Luebke, Texas Parks
& Wildlife Department, Dec. 31, 1978.

COSTS - BENEFITS EVALUATION OF STOCKING HARVESTABLE-SIZE
CATFISH by

Eugene B. Henderson, Texas Parks & Wildlife Department,
Bastrop, Texas.

PERFORMANCE REPORT as REQUIRED BY FEDERAL AID & FISHERIES RES-
TORATION ACT:

Job A: Existing Reservoir and Stream Management Recommen-
dation, Texas Parks & Wildlife Department, Austin, Texas,
April 1, 1976 thru January 1, 1977.

502 244

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)

X
X
X
X
X
X

Docket No. 50-466

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Response to the State of Texas to Interrogatories from TEXPirg in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 27 day of June, 1979.

Sheldon J. Wolfe, Esq., Chairman
Atomic Safety and Licensing
Board Panel

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. E. Leonard Cheatum
Route 3, Box 350A
Watkinsville, Georgia 30677

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

R. Gordon Gooch, Esq.
Baker & Botts
1701 Pennsylvania Avenue, N.W.
Washington, D. C. 20006

J. Gregory Copeland, Esq.
Baker & Botts
One Shell Plaza
Houston, Texas 77002

Jack Newman, Esq.

Lowenstein, Reis, Newman &
Axelrad

1025 Connecticut Avenue N.W.
Washington, D. C. 20037

Steve Schinki, Esq.
Staff Counsel

U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Hon. John R. Mikeska
Austin County Judge
P. O. Box 310
Bellville, Texas 77418

Hon. Jerry Sliva, Major
City of Wallis, Texas 77485

Atomic Safety and Licensing
Appeal Board

U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

RELATED CORRESPONDENCE



502 245

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

Docketing and Service Section
Office of the Secretary
U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

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

Mr. and Mrs. Robert S. Framson
4822 Waynesboro Drive
Houston, Texas 77035

Mr. F. H. Potthoff, 111
1814 Pine Village
Houston, Texas 77080

D. Marrack
420 Mulberry Lane
Bellaire, Texas 77401

Mr. Jean-Claude De Bremaecker
2128 Addison
Houston, Texas 77030

Jonathan Kamras
1901 S. Voss Rd., #7
Houston, Texas, 77057

Carro Hinderstein
8739 Link Terrace
Houston, Texas 77025

Texas Public Interest
Research Group, Inc.
C/O James Scott, Jr., Esq.
8702 Albacore
Houston, Texas 77074

Brenda A. McCorkle
6140 Darnell
Houston, Texas 77074

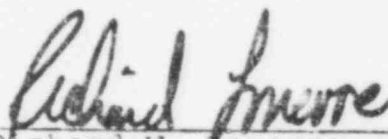
Mr. Wayne Rentfro
P. O. Box 1335
Rosenberg, Texas 77471

Ms. Kathryn Hooker
1424 Kipling
Houston, Texas 77006

National Lawyers Guild
Houston Chapter
4803 Montrose Blvd. Suite 11
Houston, Texas 77006

Mrs. Karen L. Stade
P. O. Box 395
Guy, Texas 77444

Jon D. Pittman, Sr.
2311 Bamore
Rosenberg, Texas 77471



Richard W. Lowerre
Attorney for the State of Texas