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JUL 24 1979



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attention: Docketing and Service Section

Concerning: Licensing hearings for the proposed construction
of the Allen's Creek nuclear facility by the
Houston Lighting and Power Company, Houston, TX.

I hereby petition for leave to intervene as a full party in the
hearings concerning the construction permit for the Allen's
Creek nuclear facility. I am entitled to intervene as a full
party by virtue of the following:

- 1) I live, work, and conduct my normal daily activities within
fifty miles of the proposed plant.
- 2) I failed to file for leave to intervene earlier because of
restrictions on permissible contentions contained in the
Board's notices of May 31 and September 11, 1978.
- 3) I have a direct and personal interest in the health and safety
of myself and my family, and in our use and enjoyment of the
natural resources within fifty miles of the plant.
- 4) I contend that these interests will be threatened by radiation
from the operation of the proposed plant.
- 5) Specifically, I contend that these hazards will arise due to t
the operator's inability to provide reasonable assurance that
it can obtain necessary funds to cover the estimated
costs of construction and related fuel cycle costs, as required
in Section 50.33 (f) and Appendix C to 10CFR Part 50, due to
increased estimates of costs of construction and operation,
increased costs of capital financing and reduced availability
of the same, and the inability of the operator to obtain ~~xxx~~
increases in price rates to electricity consumers necessary
for the adequate financing of construction and fuel cycle
implementation.

POOR
ORIGINAL

Yours truly,

W. Matthew Perrenod

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7-24-79

Acknowledged by card. *Perrenod*

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