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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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 PETITION  
FOR LEAVE TO INTERVENE BY  
ROBIN GRIFFITH

Applicant opposes the petition for leave to intervene in this proceeding by Robin Griffith.

Petitioner's sole statement of "interest" is:

"We are greatly concerned about the long term effects of low-level radiation, the incomplete nuclear waste sites and the chance that because of human error, a catastrophe could occur."

Aside from the reference to the "long term effects of low level radiation," the balance of petitioner's concerns are impermissibly vague. Even as to the effects of low-level radiation, petitioner does not appear to take issue with Applicant's and Staff's Appendix I calculations which show that ACNGS will-- as it must--meet NRC regulations. It is equally obvious that petitioner has not begun to lay the necessary foundation for a challenge to 10 CFR 50.36 and Appendix I thereto pursuant to 10 CFR 2.758.

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Finally, the petition appears to be in response to the "Supplementary Notice of Intervention Procedures" issued on June 18, 1979, but fails to address the central requirement of that notice that a petitioner shall state:

"...that he failed to file a petition for leave to intervene pursuant to the Board's notices of May 31 and September 11, 1979, because of restrictions on permissible contentions contained in those notices."

Absent the necessary representation, the petition is merely a nontimely document which fails to address the criteria of 10 CFR 2.714(a)(i)-(v). Accordingly, the petition should be denied.

Respectfully submitted,

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NUCLEAR REGULATORY COMMISSION

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HOUSTON LIGHTING & POWER COMPANY

(Allens Creek Nuclear Generating  
Station, Unit 1)

§  
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§  
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Docket No. 50-466

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to Petition for Leave to Intervene by Robin Griffith in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 27th day of July, 1979.

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