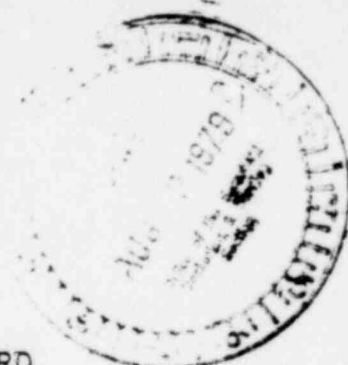


7909270351



NRC PUBLIC DOCUMENT ROOM

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)

§
§
§
§
§
§
§

Docket No. 50-466

APPLICANT'S RESPONSE TO PETITIONS
FOR LEAVE TO INTERVENE OF:

MARGARET BISHOP
MARJORIE GURASICH
J. MORGAN BISHOP

Applicant files this response to the subject petitions for leave to intervene. The three petitioners share a common element; all own property or reside in close proximity to the proposed ACNGS site; as such, they are within the "geographic zone of interest."

Each petition, however, shares a common infirmity: a failure to address the requirements of 10 CFR 2.714(a)(2). Although the petitions refer to a "radiation hazard", there is no specification of the nature of the harm they anticipate nor the particular mechanism (e.g., component failure) giving rise to their concern. In their present forms the petitions

25082204

7909270351

1046 262

do not set forth "the specific aspect or aspects of the subject matter of the proceeding as to which petitioner wishes to intervene." 10 CFR 2.714(a)(2).

One's best guess as to the hazard perceived by the petitioners may be a concern arising out of radioactive emissions in the course of normal plant operations. That matter is governed by 10 CFR 50.36 and Appendix I thereto, with which applicant must comply. The petitioners, do not assert that these limitations will not be met and, certainly, do not begin to set forth the grounds for a challenge to the rules pursuant to 10 CFR 2.758.

Accordingly, the subject petitions should be denied.

Respectfully submitted,

C. Thomas Biddle Jr.

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

CTB:01:J

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)

§
§
§
§
§
§

Docket No. 50-466

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to Petitions for Leave to Intervene of Margaret Bishop, Marjorie Gurasich and J. Morgan Bishop 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.

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

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

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

Richard Lowerre, Esq.
Assistant Attorney General
for the State of Texas
P. O. Box 12548
Capitol Station
Austin, Texas 78711

Hon. Charles J. Dusek
Mayor, City of Wallis
P. O. Box 312
Wallis, Texas 77485

Hon. Leroy H. Grebe
County Judge, Austin County
P. O. Box 99
Bellville, Texas 77418

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

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

Charles Perez
1014 Montrose Blvd.
Houston, Texas 77019

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

Gayle De Gregori
2327 Goldsmith
Houston, Texas 77030

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

Mrs. W. S. Cleaves
8141 Joplin Street
Houston, Texas 77017

Ms. Ann Wharton
1424 Kipling
Houston, Texas 77006

Vesta Eidman
1117 River Bend Drive
Houston, Texas 77063

Ms. Kathy Mohnke
1411 Lamonte
Houston, Texas 77018

Mr. James H. Robinson
1228 Bomar
Houston, Texas 77024

Dick Day
3603 Drummond
Houston, Texas 77025

Ms. Bonny Wallace
614 Meadowlawn
LaPorte, Texas 77571

Niami Hanson
6441 1/2 Mercer
Houston, Texas 77005

Elinore P. Cumings
926 Horace Mann
Rosenberg, Texas 77471

Mr. & Mrs. Bruce A. Palmiter
P. O. Box 183
302 South Missouri Street
Orchard, Texas 77464

Fern Barnes
2406 Morning Glory
Pasadena, Texas 77503

Jeanne Robertson
23 Nueces Street
Bay City, Texas 77417

Eugene E. Mueller
15602 Corsair Rd.
Houston, Texas 77053

J. Michael Ancarrow
4130 Bell
Houston, Texas 77023

John Beverage
Jeanette Beverage
13031 Harwin
Houston, Texas 77072

Barabara Blatt
4314 1/2 Bell
Houston, Texas 77023

Laura Brode
5422 Olana Dr.
Houston, Texas 77032

James D. Chilcoat
4310 Bell
Houston, Texas 77023

Gabriella Cosgriff
5203 Crystall Bay
Houston, Texas 77043

Abraham Davidson
704 Hyde Park
Houston, Texas 77006

J. Cl. De Bremaecker
2128 Addison
Houston, Texas 77030

Robert C. Kuehm
Rachel Kuehm
1155 Curtin
Houston, Texas 77018

William Schuessler
5810 Darnell
Houston, Texas 77074

Dana Erichson
Pat Erichson
327 Hedwig
Houston, Texas 77024

Stephen A. Doggett, Esq.
P. O. Box 592
Rosenberg, Texas 77471

Bryan L. Baker
1118 Montrose
Houston, Texas 77019

J. Morgan Bishop
Margaret Bishop
11418 Oak Spring
Houston, Texas 77043

Janice Blue
1708 Rosewood
Houston, Texas 77004

Stephanie M. Brown
3510 E. Broadway #612
Pearland, Texas 77518

Carolina Conn
1414 Scenic Ridge
Houston, Texas 77043

Fortes Johnston
1407 Scenic Ridge
Houston, Texas 77043

Gregory J. Kainer
11118 Wickwood
Houston, Texas 77024

Barbara Karkabi
1917 Wentworth
Houston, Texas 77004

T. E. Elder
2205 Hazard
Houston, Texas 77019

Helen Foley
3923 Law #16
Houston, Texas 77005

Mary L. Fuller
614 Bienville
Houston, Texas 77015

Barbara J. Ginn
4309 Bell
Houston, Texas 77023

Robin Griffith
1034 Sally Ann
Rosenberg, Texas 77471

Marjorie A. Gurasich
Rt. 1, Box 410
Wallis, Texas 77405

W. Matthew Perrenod
4070 Merrick
Houston, Texas 77025

Dorothy J. Ryan
4309 Bell
Houston, Texas 77023

Glen Van Slyke
1739 Marshall
Houston, Texas 77098

Marlene R. Warner
6026 Beaudry
Houston, Texas 77035

Jeffery R. West
10903 Sageberry
Houston, Texas 77039

Rosemary N. Lemmer
11423 Oak Spring
Houston, Texas 77043

Laura Lewis
1203 Bartlett #4
Houston, Texas 77006

Susan S. McGuire
8837 Larston
Houston, Texas 77055

Frances Pavlovic
111 Datonia
Bellaire, Texas 77401

Virginia Perrenod
2704 Beatty #112
Houston, Texas 77023

Connie Wilson
11427 Oak Spring
Houston, Texas 77043

James R. Piepmeier
618 West Drew
Houston, Texas 77006

Patricia L. Strelein
Route 2, Box 395-C
Richmond, Texas

D. B. Waller
1708 Kipling
Houston, Texas 77098

Ron Waters
3620 Washington Ave., No. 362
Houston, Texas 77007

Dorothy F. Carrick
Box 409 Wagon Rd. Rfd. #1
Wallis, Texas 77045

C. Thomas Biddle Jr.
C. Thomas Biddle, Jr.