

SERVED
SEP 18 1979

Sept. 12, 1979



Secretary
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sirs:

Enclosed please find copies of my contentions in the matter of Allen's Creek.

Also my address will be changing from 926 HOrace Mann, Rosenberg to Rt. 1 Box 138 V, Rosenberg, Texas 77471.

I would like to respectfully request that you please give some further thought to holding the hearings at a site such as the Fort Bend County Fairgrounds. Parking and seating space is plentiful there. It is a convenient location for people in the area to get to. Actually I do not know how much citizen participation you would like but I sincerely believe that the fairground could handle comfortably any size group large or small.

Thank you for your attention and time.

Sincerely yours,

Elinore P. Cumings
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Contentions

1. The requirements of the Atomic Energy Act, as amended have not been met in that the applicants are not financially qualified to construct the proposed facility as noted in recent hearings requesting a rate increase.

2. The requirement of the National Environmental Policy Act and 10 CFR Part 51 have not been met in that the forecast of the need for power which the plant will supply, as contained in the applicants' Environmental Report and the Staff' Draft Environmental Report and Environmental Statement is inaccurate due to:

a. failure to take into account the impact of the large lignite plants being built north of Houston.

b. failure to account for the impact of energy conservation measures both the voluntary brought about through education and awareness and the involuntary brought about through legislation, pricing new standards etc.

c. failure to consider the effects of alternate price designs such as interconnecting lines and peak load pricing.

d. failure to provide for complete internalization of all significant external costs so that the total cost of electricity is charged to those using it.

3. In the Environmental Report-Supplement Vol I Sect. s-5-35 there was no environmental study of water for domestic water usage made for the Rosenberg. It does not delve into how many residents do in fact draw water from the Brazos either directly or indirectly through seepage into shallow wells especially those living right along the Brazos. Nor does it state how many children will in fact drink water from the Brazos while swimming; nor how many people will be affected through fishing in the Brazos. Nor does it take into account fully the amount of pollution that will find its way into the food chain via cattle, grain crops and home and truck vegetable gardens in the area and along the water shed.

4. The proposed nuclear plant should not be built at the Allen's Creek site because the Bay City site already has a cooling tank built and this would require less water than is proposed for useage at Allen's Creek.

a. Water supply and quality are already becoming major issues as noted in recent studies by Texas A&M.

b. Land subsistence from the falling water table is already a major problem in this area.

c. Projected population at the Bay City site far less than the projected population near Allen's Creek site.

5. The proposed nuclear plant at Allen's Creek is unnecessarily polluting. It is proposed to emit in the vicinity of 36,000 curies per year versus other plants being built that give of much less as in the neighborhood of 1500 curies per year.

6. There has not been sufficient attention given to the use of other less environmentally costly and polluting forms of generating energy such as:

a. burning of sour gas that is presently just burned off

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Contentions continued

at oil fields such as the Thompson Field to produce steam energy.

b. use of solid waste combustion already in use at over 21 plants and used successfully in Europe for more than 40 years.

c. use of solar energy which is becoming more practical each day as new technology surfaces in both passive and active forms for residential and industrial use. If as few as 20% of HPL customers were able to use solar passive methods for even 50% of peak load needs then Allen's Creek plant would be totally useless.

d. use of hydro and gyro power which are nonpolluting. Wind velocities do not have to be very great to generate power.

7. Conclusion in NEPA evaluations that nuclear power is more economical both financially and environmentally than other modes such as coal fired is inaccurate.

a. failure to correctly evaluate TOTAL costs versus total benefit.

b. studies show that if health, financial, security, legal, operating, and building costs considered then nuclear energy is very costly.

8. There are not adequate alternate storage sites for wastes. More may have to be stored on site than originally proposed due to factors such as leakage problems at present sites and concerns with storage tanks at storage sites. States surrounding Texas have emphatically declared they do not want the waste from Texas.

9. Further study needs to be made of all ramifications of low level radiation emission. The magnitude of effects not fully documented. Recent press releases that even such low levels as those emitted by microwave ovens may cause cataracts at an early age, and the possibility of hidden genetic damage that would not show up for perhaps a decade require that more long term study needs to be followed up.

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E. Louis Rupp