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PROD. & UTIL. FAC. 50-466

September 12, 1979

Staff Council
US Nuclear Regulatory Commission
Washington, D. C. 20555

In the Matter of)
Houston Lighting & Power Company) Docket No. 50-466
(Allens Creek Nuclear Generating)
Station, Unit 1))

Gentlemen:

In compliance with your requests for an additional letter explaining specific contentions--I do hereby present same:

1) A coal plant would be a preferable choice of generating plants for the Allens Creek Site. The impact on the area would be less in that the general risk to the local citizen and the outer area citizen is greatly altered and reduced. Economically a coal plant would very nearly compare in costs--in 1975 money--"Electrical World", November 15, 1975 showed that electricity from nuclear plants actually averaged 18.2 mills per kilowatt-hour whereas electricity from coal plants cost only 13.5 mills per kilowatt-hour. In 1975, Investors' Responsibility Research Center's "News for Investors" pointed out the following liabilities of nuclear plants: increasing capital cost including hughe overruns, the increasing price of uranium, the disappointing operating (capacity)experience of nuclear plants; uncertainties related to fuel enrichment, the lack of reprocessing plants, and the lack of a definite program for the disposal of high-level radioactive wastes. Researchers are beginning to come up with solutions to the environmental problems of coal: Dr. Ralph E. Peck and Dr. Ladd Pircon at the Illinois Institute of Technology have developed a "scrubbing" process that removes sulfur dioxide from coal combustion effluent and combines the residue with other chemicals to produce a high-grade fertilizer for agriculture. If the process proves effective in the field, experts say the outcome could be lower utility rates for consumers, a scrubbing system that pays for itself and a steady source of domestic materials for fertilizer for farmers. Another nice thing is this scrubber system costs about 33 million compared with others up to 140 million. This process was tested with both high sulfur coal and low sulfur coal; therefore it should be possible to use Texas lignite. The amount of sulfur dioxide leaving the smokestack was reduced by 95% with significant reductions in the particulate matter as well. (Story appeared in the Houston Post September 1, 1979.)

2) The location of the South Texas Nuclear Plant in Bay City is a more desirable choice of location than the Allens Creek site near Wallis. The city of Houston is rapidly encroaching on the western suburbs. Katy, Sugarland, Richmond and Rosenberg all had small populations back in 1970 of 2,923; 3,318; 5,777;12,098 respectively. In just ten years the area west of Houston has spread and spread to where its difficult to point to a rural boundry--perhaps Sealy. Its not hard to picture solid residential areas solid all the way out Interstate 10 to Katy in just a few years. By the time this nuclear plant will have worked 30 years about 2020 the area within 20 miles of the plant will be highly developed. It would seem extremely likely that HL&P's estimates are badly off particularly looking at Ft. Bend County. (Texas Department of Water Resources; Population Projections, Planning and Devlopment Division, December 1978 and The Rosenberg Chamber of Commerce) HL&P's projections in the Final Environmental Statement appear to be off about 100,000 in the year 2000 and much more so by the termination of the plant. This area is much more heavily populated than the Bay City area and totally unsuitable for a nuclear plant. The Bay City plant has facilities for the addition of a 1200MW plant. The existing lake is adequate--this would create essentially a water savings by not having to maintain the Allens Creek Lake. The water supply in Houston is getting to be a concern particulary with the subsidence with water well useage. Environmentally the placement of the plant in Bay City uses much less land, and the impact is greatly reduced because an entire section of the city remains free of a nuclear plant and its accompanying possible "accidents".

3) The transportation of radioactive material on Texas Highways will surely result in several accidents. I contend that the present plan to use Interstate10 is not acceptable because of the population density of the area. Harris(Greater) County estimates range from over 7 million people (Population Projections for Texas Counties: 1980-2020, University of Texas-Austin, Population Research Center, 1979) to HL&P's 4,530,000. Until such time as we have trucks that don't collide, the permit for the Allens Creek plant should be denied due to the possibility of accidents through Houston.

4) The present status of storage for radioactive materials is in limbo because noone knows where to store something for several thousand years (650 for reprocessed). Until such a challenging problem is solved--all permits for other nuclear plants should be denied.

Cordially yours,

Carolina Conn

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