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September 12, 1979
Rt. 2 Box 395 - C
Richmond, Tx. 77469

Sheldon J. Wolfe, Esq., Chairman
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Gentlemen:

In response to your notification, dated August 7, which requires petitioners seeking intervention status in the Allen's Creek Nuclear Generating Station licensing proceedings to submit more specific contentions for your consideration, I present the following:

1. It is more ecologically logical to locate the proposed generating station at the same location as the existing South Texas Plant site because:

- a. Less land would be required if the proposed generating station is incorporated into plans for the South Texas Plant site.

It seems illogical to unnecessarily remove 5,720 acres of potential agricultural land, which is considered some of Texas' richest, from farm production.

- b. The Allen's Creek site lies directly in the migration path of millions of Snow Geese. Location of a commercial facility of this nature here could disrupt their natural migration pattern.
- c. The thermal rise in temperature of water discharged into the Brazos River during winter months would have an adverse effect on aquatic life and plant life.

The warmer water temperature would also encourage unnatural plant growth, and would, therefore, create plant pollution that clogs the water flow.

It must be noted by the NRC board that many residents in the vicinity of the Allen's Creek Plant site supplement their diets with aquatic life from the Brazos River, and from its smaller tributaries, such as Cyster Creek and Jones Creek.

Since the ecological fate in areas surrounding the South Texas Plant site has already been decided, it seems unreasonable to repeat the damage with an additional site at Allen's Creek.

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2. The location of a nuclear facility at the Allen's Creek Plant site would hinder and limit the current westward trend for development of the Greater-Houston area because:

- a. Statistics compiled by the Texas Employment Commission indicates that 12,000 new residents are being absorbed by Fort Bend County annually. Similar growth trends are being experienced in Austin County as development creeps out the Kathy Freeway.

The Metropolitan Transit Authority has predicted that eventually the center of Houston will be located at State Highway 6.

If the Allen's Creek Nuclear Project is given the go-ahead, it with either limit development to the west, or the plant site will end up being smack in the middle of residential communities.

- b. For safety reasons, the application submitted for licensing of the Hou-West Airport (Reference proposal number filed with the Federal Aviation Administration is: 79-ASW-160-WRA) will more than likely be rejected if a nuclear plant is located in the vicinity.

3. It is more economically logical to locate the proposed nuclear facility at the same location as the existing South Texas Nuclear Plant site because:

- a. Some initial construction costs would be cut, since two locations would mean needless duplication in construction, such as support services, the cooling lake, etc.

Therefore, also savings in construction could be realized. Putting construction costs that will be passed on to energy users is in the best public interest.

I allege that Houston Lighting and Power's Environmental Impact studies are insufficient because they did not consider the South Texas Plant site as an alternative to Allen's Creek in their documentation.

I, therefore, appeal to the board to weigh my contentions for considering the alternative plant site against those of the applicant, Houston Lighting and Power, who want the site at Allen's Creek.

I also appreciate the LRP's consideration of my petition to intervene, an appeal to them to grant me intervenor status.

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Sincerely,

Patricia A. Stulen