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2301 Cedarlake Drive
Houston Texas 77055
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Cham Stephens,
Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington DC 20555



Re: The Permit Request by Houston Lighting and
Power to build a Nuclear Power Plant
near Wallis, Texas to be called the Allen Creek
Plant

I wish to speak, in opposition to the
construction of this power plant and of all
nuclear power plants, in this letter.

My qualifications are 1. I have a B.Sc.,
M.Sc. and Ph.D. in Zoology from Australian
and United States major university institutions.

2. I live on the north-west corner of
Houston close to the proposed site of the
Plant

3. I have served as a volunteer on the
Impaired Consent Committee of the Texas
Research Institute of Mental Science.

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My major points of opposition are there

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4. Moral Issues

The production of radioactive material, its transportation and its storage as waste is a moral issue.

It is too important an issue to be entrusted to majority opinion. The average lay person does not have sufficient understanding of the principles of nuclear fission, the processes of radioactive decay or the effects of radiation on living things, to make a truly informed judgement of the risks. They cannot give a truly informed consent to the location of a nuclear plant or the storage of nuclear waste in their vicinity. The proponents of nuclear power plants in Hanston are people of little education. They call the plants NUCLEAR POWER plants and are swayed by the catch words of "energy shortage" and by immediate short-term goals. The risks cannot be expected to be accurately presented by Hanston's Fighting and Power. They have a vested interest in the plant for economic gain.

We must look to a body of informed, intelligent, compassionate, unbiased national people to carefully appraise the facts which follow. We must not have a premature appraisal without examining all the facts.

B. Radiation Damage.

My experience has been that the more informed proponents of nuclear power are physicists. My experience shows that physicists are blatantly ignorant of biological facts. These are:

- a) All forms of radiation in all dosages will cause changes in the genes of living cells. This is now recognized as a change in the sequence of amino acids on the nucleic acid which codes for proteins.
- b) These changes are called mutations. They are permanent, they cannot be cured or treated. They are cumulative. If it is a reproductive cell in which the change occurs the effect is passed to the next generation.
- c) Most mutations are harmful, either directly, or indirectly (by interfering with the cell's ability to divide).
- d) An accelerated mutation rate produces an accelerated rate of evolution.

C. Storage of Nuclear Waste.

The by-product of the nuclear power plant is highly radio-active. Its half-life is in thousands of years. It cannot be made non-radioactive. It will remain ~~radio~~ radio-active for thousands of years. With every nuclear reactor that is built we increase the

amount of radiation in our environment and we increase its concentration - for thousands of years. A living creature cannot protect itself against nuclear radiation. It cannot see it, smell it ~~or~~ feel it, or hear it. By allowing nuclear power plants to be built, the Nuclear Regulatory Commission is placing itself in the position of either 1) guaranteeing that all nuclear waste will be safely shielded from living things for thousands of years or 2) showing a lack of concern for the ~~best~~ lives of individual fellow human beings and a contempt for life in general.

To say that they can guarantee the first is a bold-faced lie. There is no man-made or geological structure which will safely shield the waste for this length of time. Man cannot make a structure which will remain sound for 40 years let ~~along~~ alone, thousands. Even if a structure could be built, the ingenuity of man in the future will find a way to penetrate it and it is an irony to expect that our social system, structure, and warnings will endure for thousands of years in the future. History shows us that this generation will soon be forgotten. In geology, all structures move. The time-scale however is much greater and is measured in

thousands of years. There is no structure stable for the life-time of the nuclear waste.

Therefore we can only conclude that the NRC is in the position of the record. It does not care about the life on this planet and is no better than the Nazi war criminals. It is allowing nuclear power plants to produce waste which is simply hidden from view doing its underhanded work on unsuspecting organisms secretly by way of the ground water and the air we breathe. You talk about solutions, of putting the waste in ash glass or shooting it at the sun but you have not even done this. You either find it too expensive or you do not believe the method will work. But you continue to produce more waste and more waste. The NRC is promoting the work of the Devil!

D The Viable Alternatives to Nuclear Power

There are many, - solar energy, hydro power, geothermal energy, biochemical energy, wind power, gravity, muscle power. All work. All have a place in providing the energy we need.

Our answer in the immediate future is conservation with the accompanying development of all of the alternatives, replacing some

present wasteful system with many of the
inconveniences, as there are inconveniences. The reason
why they have not been done in the past has
been that it was not considered important
to waste waste so very profitable for the
supplies of energy. They actually encourage
it and we in turn have been improving

we can conserve some of our electrical
power without even looking at the regulations
that all lights are on, including the street lights,
after work hours; all signs, advertisements, houses
are out when the business is closed or the schools
are closing, signs are lit up day and night. In
lighting a house actually offer discounts to companies
to have their lights all night. Day, automatic
unconcerning, or half-regulating for, for example
houses, and the use of insulation and other
state devices on the domestic front, and
my encouraging use of the latest low-
energy consuming industrial process technology.
we conserve the use of electricity

Day regulating that all petroleum gas should
be extinguished and that the waste heat
be used in other ways. We have been
consuming our natural gas, the amount of gas
from oil wells, and the amount of gas that is
available, we can also conserve gas in a way
encouraging the use of power back to the

pleasure purposes and the driving of automobiles by teenagers to and from high schools.

We cannot afford to listen to the noise of Houston Lighting and Power with its plea for an increase in the production of electricity. They only see higher profits. We are not short of energy, we only need to use it wisely and efficiently. Conservation will come from a multiplicity of small local changes not a single large change such as nuclear power. Americans can change their life styles to an energy prudent one without loss of human comfort. The alternative technologies are here right now.

The Nuclear Regulatory Commission can only truthfully decide against any more nuclear-power plant construction. For the sake of life on this planet it MUST decide against HLP's application and all others. Power from nuclear fission is a DEAD DUCK. The NRC has the facts. It must exercise its responsibility in safeguarding this planet from nuclear damage now and in the future.

Gene, ...

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