

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Atomic Safety & Licensing Bd.

In the Matter of
HOUSTON LIGHTING & POWER COMPANY
(Allens Creek Unit 1)

Docket 150-166
Sept. 12, 1979



TEX PIRG'S AMENDMENTS TO CONTENTIONS
DATED MAY 12, 1979

On May 12, 1979, TexPIRG submitted contentions pursuant to the Board Order of April 12, 1979. The Board has permitted amendments until September 14, 1979. This document amends certain of those contentions in the manner outlined herein.

I.

Intervenor amends contentions 2, 5, and 42 of the above-cited document and subsequent amendments to that document, such that the following consolidated contention replaces those three contentions:

AMEND NO. ADDITIONAL #1 (AA1).

Intervenor alleges that the Partial Initial Decision (PID) in this docket did not consider the alternative of new natural gas fueled generating facilities; and that such a facility is feasible and will result in less environmental damage than the action envisioned in the application sought here. Specifically, the above-noted PID and the FS-FES did not consider the following factors weighing in favor of constructing a new natural gas fueled generator, extending the lifetime of gas generators presently planned for early shutdowns, and/or increasing the capacity of presently operable natural gas fueled generator units; and these factors form the basis for alleging the inadequacies of those analyses:

A. The conclusion of the FS-FES and the PID's apparently implicit conclusion that supply of natural gas outstrips demand is not totally accurate, because--

- (1) A present "glut" of natural gas exists in the market, at least partially due to price deregulation and the fuel switches which have occurred.
- (2) The conclusions do not consider improved seismic and holographic techniques at 30,000 feet or more.

B. Supposed legal constraints upon the use of natural gas have been improperly used as a basis for dismissing the potential of natural gas, because:

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Additional contention #3 in the May 12, 1979 document is amended to read as follows:

AA5.

The PID did not examine the water temperatures of the ACNGS cooling lake and the effect upon game fish in depth or with adequacy. Both the PID and FS-FES failed to determine the vertical distribution of water temperatures in the cooling lake. The upper levels of water in the lake will provide the oxygen necessary for game fish life during the summer, but these levels will be too hot for normal metabolism by most game fish. Performance reports by the Texas Parks & Wildlife Department at Lake Livingston, Texas and Lake Conroe, Texas, as well as the NRC staff evaluation of the proposed Blue Hills Nuclear Power Plant in East Texas verify this conclusion for lakes in comparable climates. The Board should order a reduction in the effluent temperatures at the ACNGS lake.

IV.

Additional contention #16 of the May 12, 1979 pleading is amended as follows:

AA6.

The town of Wallis should be considered as the population center because of the rapid growth in the area. The addition of the nuclear power plant and the large inter-continental airport near the plant will cause the Wallis population to exceed 25,000 by the year 2027. Applicant concedes that use of the cooling lake will affect the Wallis area population, and the City of Houston has projected the need for two jet airports west of the city. Hou-West, Inc., is planning such an airport near Katy, which is in the vicinity of Wallis, and the developer has been quoted as stating that he would like to shift the site more to the west if possible, which would place it even closer to the power plant. It is a well-known geographic principle that the availability of major transportation facilities can shift the locus of residential development into the direction of the available transportation. Furthermore, major airports usually are accompanied by commercial strip development on routes to and from the airport.

V.

WHEREFORE PREMISES CONSIDERED, TexFIRG requests the board to

