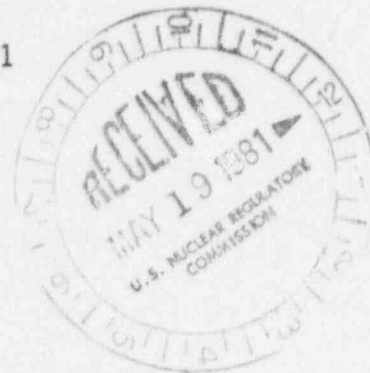




UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 18, 1981



Daniel Cosgrove, Esq.
Assistant General Counsel
Federal Emergency Management Agency
Office of General Counsel
1/25 I Street, N.W.
Washington, D.C. 20472

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

Dear Mr. Cosgrove:

Pursuant to our conversation today, enclosed is a copy of the emergency planning contention that has been admitted in the Allens Creek proceeding. As can be seen by looking at the contention, certain sections of the contention have not been admitted by the Licensing Board (Sections I, II, III(d), V (sentence dealing with possible radioactive contamination of Brazos River water), and VI). The Allens Creek site is located approximately 45 miles west of downtown Houston between the towns of Sealy and Wallis. A site location map is also enclosed.

Hearings on this contention have not been scheduled as of this date. The NRC Staff expects that this issue will be scheduled in early Fall 1981. I will keep you informed on this matter.

If you have any questions, I can be reached at 492-7417.

Sincerely,

Richard L. Black
Counsel for NRC Staff

Enclosures: As Stated

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

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Schuessler Consolidated Contention 1

I. Applicant's Environmental Report and PSAR, and NRC's FES and SER, in regard to emergency planning, fail to comply with provisions of 10 CFR Part 50, Appendix E, and 10 CFR Part 100 as (to be) amended.

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Order

II. Applicant fails to demonstrate any capability of safely evacuating the Houston area in the event of an ACNGS accident of any magnitude up to and including Class 9.

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in 9/11/80
Order

III. ACNGS fails to adequately meet requirements of 10 CFR Part 100, regarding siting, for reasons which include, but are not limited to, the following: (a) Applicant fails to adequately recognize that metropolitan Houston is the fastest-growing area in the U.S., steadily and rapidly expanding toward the site of ACNGS; (b) The proposed site of ACNGS is not presently sufficiently remote, and will become even less so during its operating life; (c) Traffic congestion at present and for the foreseeable future prevents any effective, timely emergency evacuation of the greater Houston area, or any substantial part thereof; [(d) The State of Texas has no tested and approved evacuation plan for nuclear emergencies;] and (e) The distance from ACNGS to population center should be much greater than $1 \frac{1}{3} \times \text{LPZ}$ because of special circumstances cited above.

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- IV. The PSAR fails to meet requirements of 10 CFR Part 50, Appendix E, IV, in that it fails to assure the compatibility of emergency plans with site location, access routes, population distribution and land use.
- V. The PSAR and the selection of the proposed site do not properly consider population density, land use, physical characteristics [possible radioactive contamination of Brazos River water], thereby failing to adequately insure low risk of public exposure as required by 10 CFR Part 100.10.
- VI. The Board should deny Applicant a construction permit until these requirements are met, and Intervenor's contend that these requirements cannot be met at this proposed site.

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Fig. S.2.1. Site location. Source: FES, Fig. 2.1 (modified).