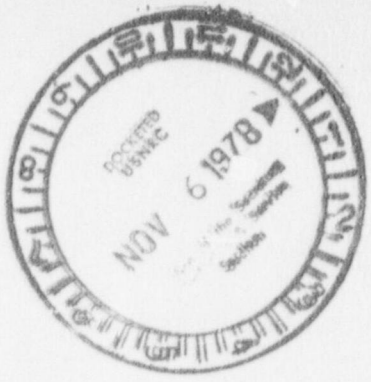

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	x	Docket No. 50-466
	x	November 1, 1978
HOUSTON LIGHTING AND POWER COMPANY	x	
	x	
(Allen's Creek, Unit 1)	x	

BRENDA A. McCORKLE'S AMENDED PETITION
FOR LEAVE TO INTERVENE

I.

This amended petition is filed under protest because of the limited time allowed for its preparation and because of the location of the special prehearing. I feel that the time allotted for the preparation of this petition is tantamount to duress and object accordingly.

II.

My family and I will be personally affected by the pollution and radiation emitted from this facility. On October 30, 1978, the pollution level for southwest Houston (where I live) was declared to be beyond the safe level for people. This already-present pollution in combination with that to be generated by this nuclear plant will be dangerous to my family, especially to my children as they may be more susceptible to radiation-induced cancer and genetic problems generated by exposure to radiation.

The population of southwest Houston, Sugarland, Missouri City, and points west is increasing at a tremendous rate which creates a corresponding increase in pollutants in the area. The auxiliary boiler alone will account for 45 tons of pollutants per year. This, plus pollution

from increased population density, plus radioactive pollution will be a genuine hazard to the health and well-being of all residents of this area.

III.

The cooling lake is of questionable or little value as a recreational facility because it may be subject to restricted use during spring and summer months (a time when most people would want to use it). Also, the concentrations of algae, chlorine, human fecal matter, and possibly heavy metals may kill or render inedible any fish that may be caught. The elevated temperature of the lake will increase algae growth, increase populations of rough fish, and inhibit the development of game fish. Aquatic birds may suffer disease and population declines from eating fish and plant life in the cooling lake.

IV.

The cost of the facility may be excessive. If construction personnel is up 14.3%, how much does it cost? How much will it cost me?

V.

It is insufficient to say that radioactive waste will be stored at some future time at an undesignated federal depository. Since nuclear waste is so extremely dangerous to human life, there should be absolute certainty as to its disposition.

VI.

The Allens Creek plant should not use the Boiling Water Reactor because it emits over twenty times more radiation into the air than a Pressurized Water Reactor of the same power output. The BWR is being

by HL & P because of a dispute with Westinghouse over uranium prices. Also, this type of BWR has never been tested in actual operation even though many new designs are used in it. New information by former General Electric engineers and former NRC engineers indicate that the new General Electric BWR's have many unresolved and perhaps unsolveable problems.

VII.

The Allens Creek plant should be required to continue the use of the 100 meter stack (its removal is new information) so as to disperse the radioactive gases. It should also add more charcoal absorbers and other air pollution equipment so that the emissions of radioactivity into the air is no more than that of a PWR. Without doing the above, the applicant will fail to meet the "as low as practicable" requirement of 10 CFR part 50.

VIII.

The Allens Creek plant does not have a sufficiently sensitive system for the detection of loose parts inside the reactor vessel. This failure could lead to a core meltdown because of insufficient cooling of the very sensitive core. Since it is rather difficult to actually go inside the reactor after operation has begun, there must be some method for detecting these loose parts before thaey block the water flow.

IX.

The applicant does not have sufficient control of the exclusion area because it has no control over the owners of oil and gas leases within the exclusion area. Drilling with this area could lead to contamination of the ground water near the site.

X.

No plan has been developed to protect the plant operators from the danger of poisoning from gases such as chlorine which could come into the control room in sufficient quantities to force evacuation before the plant was brought down to low power status. Railroad accidents and on-site storage of gases such as chlorine could be sources for such gases.

XI.

Petitioner contends that the Allens Creek plant containment concrete shield should be built to withstand the impact of a 747 airplane. The Houston area has recently been allowed many more routes to places such as Los Angeles, which cause more planes to pass near the reactor site. Last week a plane actually fell on a car which is much smaller than the containment shell. The recent attempts to steal a nuclear submarine and the successful attempt to rob a nuclear tender indicate that unstable or fanitical people could crash a plane into the containment deliberately.

XII.

Because the planned releases of radioactivity into the air and into the water will both largely fall into the cooling lake, and because of the concentrating effect of radioactivity in the higher chains of wildlife and fish, the public should not be allowed to eat any fish caught from the lake.

XIII.

The effect of groundwater subsidence has not been sufficiently considered in the EIS or safety analysis because with the increased

pumpage fromthe plant and the new industries and homes near the plant, the plant will sit on the "lip of the subsidence bowl" such that faulting could crack the containment causing the release of excessive amounts of radiation.

XIV.

The radwaste building has not been planned to withstand eqrthquake, tornado, and turbine missiles to a sufficient degree. A tornado recently caused much damage at a nuclear plant in Mississippi which has the same protection planned for this site.

XV.

Since the drywell and containment and shield are all very large, and the state of the art of concrete and steel work is such that a uniform and homogenous structure is not possible, the applicant's calculations of strength are based upon average valuse of strenght which does not determine the important "weak link" in the structures. For this reason, the drywell, containment and shield all must be actually tested at the estimated maximum pressures expected to be generated within the respective structures during a core melt accident. This test must be done before even low power operation of the plant starts.

XVI.

The Allens Creek plant plans to use a new fuel arrangement and containment system even though it has not been proven safe in actual operation. The storage of fission gases in each fuel rod will cause the emission of a massive does of radiation during a core melt accident.

XVII.

The fuel rods to be used are not safe because of clad failures and

off gas activity caused by hydriding and the effects of fuel densification which increases the power spikes and heat generation rate.

XVIII.

The reactor coolant pressure boundary does not have sufficient safety protection after years of operation. Even if safe when installed, the stresses and strains and corrosion caused by operation will cause the pipes to crack and break before the life of the plant has expired. The safety/relief valves will not even provide enough protection once a crack defelops. Also, no certain metod exists to detect microcracks until it is too late to prevent the pipe break.

XIX.

The Residual Heat Removal System is defective in that it is not single failure proof (criterion 34). The failure to open of one isolation valve leading to a recirculation loop could lead to failure to achieve a cold shutdown soon enough.

XX.

The containment as designed will allow excessive leakage to bypass the filtration systems. The power company admits that 20% of the leakage would not even be filtered. Also, the filter absorber may start a fire by auto-ignition, yet there is no water spray to prevent such auto-ignition as required by NRC regualtion Guide 1.52.

Respectfully submitted,

Brenda A. McCorkle

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	x	
HOUSTON LIGHTING & POWER COMPANY	x	Docket No. 50-466
(Allens Creek Nuclear Generating Station, Unit 1)	x	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Amended Petition for Leave to Intervene in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, this 2nd day of November, 1978.

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U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

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