

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

NRC PUBLIC DOCUMENT ROOM

ADMENDMENT TO PETITION TO INTERVENE
SUBMITTED BY F.H. POTTHOFF III



I.

I respectfully request I be allowed to submit a new contention to my petition to intervene. I realize this is several days after the prehearing conference, but I shall list several reasons as to why my new contention should be accepted, re CFR 2.714(d).

As you may know, Nov. 7 was election day throughout the U.S.A. In Texas, the citizens of the state not only voted on state, local, and congressional offices, but were also asked to approve or deny several admendments to our constitution, the Texas Constitution of 1876. One of these admendments was Admendment 4, which stated the legislature would be allowed to exempt solar and wind equipment from taxes (Sales, property, wtc.) The people of Texas approved this admendment two to one (see The Houston Post, Nov. 8, 1978, page one.)

In the supplement to the PES (S.9), it is stated that coal is the only viable alternative to the Allens creek nuclear plant, mainly because current alternatives (wind and solar) are too expensive to be commercially feasible or are only in experimental stages (pp. S.9-6 to S.9-9, listings under heading Solar Power.) It is my contention that with passage of Admendment 4 on Nov.7, solar and wind technologies have the potential of economic feasibility and could be in use by 1985,

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the date ACNGP will come on line. For example, the supplement on page S.9-7, under heading Photovoltaic conversion, states the purchase price of silicon solar cells is about \$20000 per kilowatt. In the Nov. 3, 1977 issue of Rolling Stone, Joe Klein states that as of that date silicon solar cells cost between \$15 to \$25 per watt (\$1500 to \$2500 per kilowatt,) so apparently photovoltaic cells are becoming less expensive, and now with the possibility of their manufacture, sale, and use being tax exempt, photovoltaic could become a feasible alternative to nuclear power and Allens Creek. Also, the supplement states on page S.9-7, top, that wind power is not considered a viable alternative by the staff before the mid 1980s because of lack of " . . . commercial availability . . ." I submit that Admendment 4, making solar and wind equipment tax exempt, will encourage the development of wind power and make it feasible by the mid 1980s, when Allens Creek will come on line. I contend also this will be true for ocean thermal gradients and will make them feasible by the mid 1980s.

If Admendment 4 will make these alternatives economically viable by the mid 1980s, I contend they are more environmentally sound than nuclear plants and the ACNGP, and therefore are more desirable. The Atomic Licensing & Safety Board should deny the permit to construct ACNGP, Unit 1.

III

I ask the Staff and the ALSB to accept this admendment to my intentions, even though it is late. Under CFR 2.714(d), I believe I have good reasons to file this late, namely:

1. My original supplement to my petition to intervene had to

be in by Nov. 2. The people of Texas voted in Admendment 4 on Nov. 7.

2. It is the duty of the ~~ASLB~~ to investigat and rule on all developements concerning the ACNGP, even if these developements occur late.

3. If viable alternatives develope to the ACNGP, the ASLB has a duty to decide if they are preferrable to the plant.

For these reasons, I hope the ASLB would allow me to file this admendment to my contentions.

An American and a taxpayer,



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