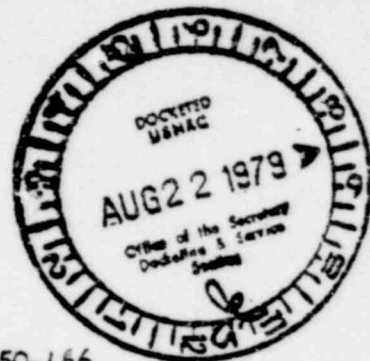


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of

HOUSTON LIGHTING AND POWER
COMPANY

(Allens Creek Nuclear Generating
Station, Unit 1)

Docket No. 50-466

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AMENDMENT TO PETITION FOR LEAVE TO INTERVENE
FILED BY WILLIAM J. SCHUESSLER

In reply to NRC Staff's response of July 25, 1979, I wish to amend my petition to include the following contentions and particulars:

My interest in this matter is clearly established by virtue of the following facts; I live with my wife and son in a residence located at 5810 Darnell, in southwest Houston, Texas. I am 55 years of age. My wife and I own this residence and presently expect to live in it up to my retirement at age 65, and probably thereafter. It is possible we may wish to sell this property at some future date, and move elsewhere.

This property is just thirty-five miles East (as the cloud flies) of the site of Allens Creek Nuclear Generating Station, Unit 1.

At present, I work at a printing plant about ten miles from my home. I also work evenings in a retail store about one-half mile from my home. I have three daughters, two sons-in-law and one grandchild, all living in southwest Houston, also.

Houston Lighting & Power Company supplies my electric power.

It is my contention that the licensing (and the presumed subsequent operation) of ACNCS will cause injury in fact to my financial, property, health and other interests because:

1. The mere proximity of ACNCS to my property, with all related hazards stated in this petition, and others, would provide obstacles to the sale or rental of this

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of this property for full value, if a prospective buyer or tenant were willing to buy or rent at all. I contend, therefore, that the licensing of ACNCS will probably cause injury in fact to my financial, property and other interests.

2. Since most weather activity approaches the Houston area from the West, and since ACNCS is just 35 miles due West of my home, it is most probable that any radioactive material which should escape from ACNCS will move in the direction of Houston and might arrive there in a matter of minutes. I contend, therefore, that the licensing of ACNCS will probably cause injury in fact to my financial, property, health and other interests.
3. While I have no evidence that operators of ACNCS intend not to comply with applicable NRC regulations governing construction and normal operation of nuclear generating stations, history and experience tell us that such violations do occur because of accidents, faulty workmanship, human error and bad judgement, corner-cutting by contractors, faulty equipment and materials, poor design, inadequate standards and regulations and for many other reasons. The probability exists, therefore, that, if licensed, at some time or another ACNCS will release radioactive material and the resulting radiation will probably cause injury in fact to my financial, property, health and other interests.
4. Should a serious accident occur at ACNCS, resulting in release of a large amount of radioactive material(s), my residence and property could be rendered unfit for occupancy or other use because of radiation contamination. This would require that I, and my wife and son, immediately move away to safety, if possible. Even warning of the likelihood of such an accident would require such action. Actual occurrence of such an accident would result in complete and total loss of all of our property, real and personal. Therefore, I contend that the licensing of ACNCS will probably cause injury in fact to my financial, property, health and other interests.
5. Should serious accident occur at ACNCS, resulting in the release of large amounts of radioactive material(s), it is probable that I, and my entire family would be exposed to high amounts of radiation. Since radiation exposure of any amount has been proven to cause essentially irreversible cell injury of the type known to cause cancer, leukemia and genetic defects, it is likely that I and my family will incur high costs for medical care related to these diseases. Resulting death is also likely. Therefore, I contend that the licensing (and presumed subsequent operation) of ACNCS imposes an unacceptable risk upon me and my family which will probably cause injury in fact to my financial, health and other interests.

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6. Should a serious accident occur at ACNGS, it would be impossible to execute an effective evacuation plan because of population density, population growth and traffic congestion. This fact drastically reduces chances of safe escape for my family and myself. Therefore, I contend that the licensing of ACNGS will probably cause injury in fact to my financial, property, health and other interests.
7. It is a fact that a satisfactory answer to the problem of radioactive waste disposal has not been found at this time. The existence of radioactive waste from this plant (ACNGS), if it is licensed and put into operation, will provide an additional possible source of radiation exposure for me and my family. This could occur as a result of leakage from containers stored on the ACNGS site, either on surface or buried, or from leakage or accident while waste is being transported to a waste storage site elsewhere. I contend that licensing and operation of ACNGS, with the related waste disposal problem will probably cause injury in fact to my financial, property, health and other interests.
8. Since it is possible that radioactive material(s) may be released from ACNGS in circumstances less serious than those advanced in contentions numbered 4, 5, 6, and 7, I contend that any such smaller amount of irradiation would still result in cell injury of the type known to cause cancer, leukemia and genetic defect. The effects of these injuries may take longer to become evident, but the fact remains that the injuries will have occurred. I contend, therefore, that licensing of ACNGS will probably cause injury in fact to my health, financial and other interests.
9. Considering the tremendous investment of capital required for the construction and operation of plants such as ACNGS, I contend that I, as an HL&P customer, will be unfairly required to partially capitalize the venture (with no return on investment), and will be required to pay unnecessarily high electric rates in order for HL&P to profit (and profit they will) from ACNGS. There are less costly alternatives. Therefore, I contend that licensing of ACNGS will probably cause injury in fact to my financial, and other interests.

As stated in my original petition for leave to intervene, I understood restrictions in the notice of Sept. 11, 1978 to mean that any attempt on my part to intervene would be useless. Accordingly, I can state that I failed to file a petition for leave to intervene pursuant to the Board's notices of May 31 and September 11, 1978, because of the restrictions on permissible contentions contained in those notices.

Sincerely



William J. Schuessler
5810 Darnell
Houston, Texas 77074

August 8, 1979