USNRC

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

TO: Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTENTION: Docketing and
Services Branch

SERVED JUL 19 1979

DOCKET NO. 50-466 CP

In the Matter of
HOUSTON LIGHTING AND
POWER COMPANY
(Allens Creek Nuclear
Generating Sta., Unit 1)

PETITION FOR LEAVE TO INTERVENE

I hereby petition for leave to intervene as a full party in this proceeding pursuant to the the Notice of 6/18/79 published at 44 F.R. 35062. I am entitled to intervene as a full party by virtue of the following facts and reasons:

- 1. I reside within fifty (50) miles of the site of the proposed plant, and my base of normal, everyday activities is within a fifty (50) mile radius of the site.
- 2. I have a direct and personal interest and concern in the health and safety of myself and my family, and in our use and enjoyment of the natural resources within a fifty mile radius of the plant.
- 3. I contend these interests will be injured by the construction and operation of the proposed plant and the increased radioactivity and physical harm to the environment caused by the construction of this plant if a construction permit is granted.
- 4. 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.

because of	the restrictions on permissible contentions
contained in	those notices. 847 156
DATED: <u>07</u> -	847 156 11-79 SIGNATURE: Stephanie M. Brown
	t the following)
NAME	Stephanie M. Brown 3510 E. Broadway #612
CITY	Pearland Texas
STATE & ZIP	Texas 77518 7908220353