

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

DOCKET NO. 50-466CP
In the Matter of
HOUSTON LIGHTING
and POWER Co.
(Allens Creek Nuclear
Generating
Sta., Unit 1)

PETITION FOR LEAVE TO INTERVENE

I Charles Andrew Pérez hereby petition for leave to intervene as a full party in this proceeding pursuant to 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 was born, grew up and now 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 the many members of my family, and in our use and enjoyment of the natural resources within a fifty (50) 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 have worked in the oil drilling industry of Texas and have seen the consequences of the short cuts taken by industry when dealing with construction and high pressure operation. I am justifiably alarmed when I studied Preliminary Safety Analysis Report Volume 18 and read Item No. Q2-3.39 "Your response to Item Q1-3.21 is unacceptable. It is the staff's position that a structural integrity test of the Drywell is required. Provide a definite commitment to comply with this requirement." Response: "Houston Lighting and Power disagrees with the staff position that a structural integrity test at 115 percent of design pressure is required. Various avenues of appeal are now being considered."

The Drywell contains the motor drive system for the critical control rods. I am alarmed that Houston Lighting and Power want to cut

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Acknowledged by card. 2/26/80

quality control and testing in such a critical area of the nuclear reactor facilities. The Nuclear Regulatory Commission staff has had some experience with nuclear reactor operation in contrast to Houston Lighting and Powers lack of experience and true concern. As a United States citizen, voter, and customer of this utility company I oppose construction of this plant.

5. I feel that a Spanish translation of the Final Environmental Statement must be made available for those citizens living within a (50) fifty mile radius of the proposed plant facilities. This small effort to inform those citizens of Mexican decent whom may not read English is the least that must be done to respect their rights to be informed of such potentially dire changes of their environment.

6. 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.

I would greatly appreciate any and all information the Commission can make available to me to ^{help} me stay informed and educated on the subject of Nuclear Energy.

Thank you,
Charles Andrew Pérez
Charles Andrew Pérez
1014 Montrose Blvd.
Houston, Texas 7701-

July 18, 1979

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