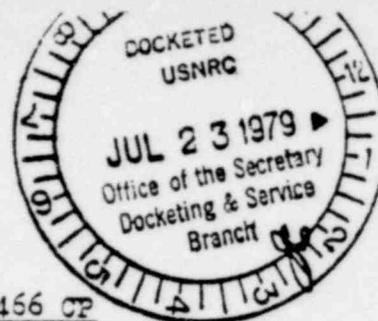


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

DOCKET NO. 50-466 CP
In the Matter of
Houston Lighting and Power
Company (Allen's Creek Nuclear
Generating Station, Unit 1)

PETITION FOR LEAVE TO INTERVENE

SERVED JUL 23 1979

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I, Bryan L. Baker, wish to intervene, as outlined in Sec. 2.714 of the NRC Rules of Practice for Domestic Licensing Proceedings, in Houston Lighting and Power's application for a permit to construct a nuclear power plant on Allen's Creek in Austin County, Texas. I did not seek to intervene in 1978 because of the restrictions on contentions which could be made at that time.

I submit the following personal information to help establish my right to intervene:

I live and work in Houston, Texas, within fifty miles of the proposed nuclear plant. I have lived in Houston since 1966, and plan to reside here indefinitely. I am an H.L.&P. ratepayer.

As for my technical qualifications to contribute to the proceedings, I should mention that I have a B.S. in biochemistry from Rice University, with a good background in physics and physical chemistry. While at Rice, and for some time after graduation, I worked as a research technician at M.D. Anderson Hospital, on a project which used radioisotopes as tracers. In addition, I worked for two summers for the U.S. Geological Survey in Jackson, Mississippi, spending most of that time on a study of flooding on small drainage areas.

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Since reading of my renewed right to intervene, in the Houston

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Post of June 26, 1979, I have devoted a considerable amount of spare time to a study of the documents filed in this case. However, I have not had time to develop fully detailed and specific contentions. I have learned enough, though, to consider the proposed Allen's Creek project a direct threat to my own health, safety, and personal well-being, that of my loved ones, and that of the entire locale. I come to this conclusion for the following reasons, among others:

1) I do not feel that the radioactivity to be routinely emitted, or that which could be released in any of a number of foreseeable and unforeseeable accidents, is safe for myself or the general environment.

2) I do not feel that the safety systems proposed are adequate to eliminate the possibility of serious accident, with consequent loss of life and economic destruction.

3) I do not feel that proposals for the short-term storage of wastes and spent fuel elements onsite, and for the transport of wastes (especially through Houston) adequately protect the public from radiation release either by accident or intentional disruption (sabotage). I am also disturbed that inadequate consideration has been given to the financial costs and continuing health hazards of long-term waste disposal and decommissioning of the plant itself.

4) The financing of the plant seems to me to be based on questionable assumptions:

- a) that enriched uranium fuel will remain in adequate supply at reasonable prices (i.e., competitive with solar, fossil, etc.),
- b) that public consumption of electricity will increase even while
- c) E.L.&P. will be freely granted continuing rate hikes to cover ever-escalating construction and operating costs, and
- d) that the plant will operate for thirty years at an average 80% capacity.

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If these and other optimistic projections of the applicant are not borne out, the applicant may have great difficulty in financing construction, safe operation, and eventual safe shutdown of the facility, and ratepayers will be saddled with tremendous costs and little benefit.

5) In this regard, I feel that alternative, and safer, energy sources will be available and economically competitive long before the proposed facility is paid for.

I hope that I will be granted sufficient time to develop specific contentions, and I hope the board will advise me which of the above general concerns are of most interest to it. It would aid me greatly to be sent copies of the Final Environmental Statement, the Safety Evaluation Report, the Rules of Practice of the NRC for Domestic Licensing Proceedings, and whatever other material the board might deem useful.

Thank you,

Bryan L. Baker

Bryan L. Baker
1118 Montrose
Houston, TX 77019

July 14, 1979

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