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PROD. & UTIL. EAC. 50-466

September 12, 1979

Staff Council  
US Nuclear Regulatory Commission  
Washington, D. C. 20555

SERVED

SEP 13 1979

In the Matter of  
Houston Lighting & Power Company )  
(Allens Creek Nuclear Generating )  
Station, Unit 1 )

Docket No. 50-466

Gentlemen:

In compliance with your requests for an additional letter explaining specific contentions--I do hereby present same:

- 1) A coal plant would be a preferable choice of generating plants for the Allens Creek Site. The impact on the area would be less in that the general risk to the local citizen and the outer area citizen is greatly altered and reduced. Economically a coal plant would very nearly compare in costs--in 1975 money--"Electrical World", November 15, 1975 showed that electricity from nuclear plants actually averaged 18.2 mills per kilowatt-hour whereas electricity from coal plants cost only 13.5 mills per kilowatt-hour. In 1975, Investors' Responsibility Research Center's "News for Investors" pointed out the following liabilities of nuclear plants: increasing capital cost including huge overruns, the increasing price of uranium, the disappointing operating (capacity) experience of nuclear plants; uncertainties related to fuel enrichment, the lack of reprocessing plants, and the lack of a definite program for the disposal of high-level radioactive wastes. Researchers are beginning to come up with solutions to the environmental problems of coal: Dr. Ralph E. Peck and Dr. Ladd Pircon at the Illinois Institute of Technology have developed a "scrubbing" process that removes sulfur dioxide from coal combustion effluent and combines the residue with other chemicals to produce a high-grade fertilizer for agriculture. If the process proves effective in the field, experts say the outcome could be lower utility rates for consumers, a scrubbing system that pays for itself and a steady source of domestic materials for fertilizer for farmers. Another nice thing is this scrubber system costs about 33 million compared with others up to 140 million. This process was tested with both high sulfur coal and low sulfur coal; therefore it should be possible to use Texas lignite. The amount of sulfur dioxide leaving the smokestack was reduced by 95% with significant reductions in the particulate matter as well. (Story appeared in the Houston Post September 1, 1979.)

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