



February 10, 1980

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the matter of )  
 )  
HOUSTON LIGHTING AND POWER COMPANY ) Docket No. 50-466  
 )  
(Allens Creek Nuclear Generating )  
Station, Unit 1) )  
\_\_\_\_\_ )

ROBERT ALEXANDER'S (PETITIONER)  
BRIEF IN RESPONSE TO APPLICANT AND STAFF

Upon receipt of both Staff's and Applicant's briefs in response to the Petitioner's appeal on February 6, 1980, the Petitioner was granted seven days in which to file and serve his reply to those briefs, as per his telephone conversation with Ms. Bishop on that day.

CANDID STATEMENTS

The petitioner regrets the paucity of information supplied by him heretofore and that some of which can not be intelligently addressed by Staff and/or Applicant. He intends to present here an improved and more suitable discourse in support of his case.

STATEMENT OF INTERESTS

At stake in the above-captioned proceeding lies an issue very dear to the Petitioner, if not to all individuals in similar circumstances: that of the well-being of himself and his family. He is concerned that his wife and children are healthy both physically and mentally. He would like to see his children grow to adulthood. This interest IS affected

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If Applicant is permitted to build ACNGS, Mr. Alexander and his family will live in their Houston residence under the constant shadow of uncertainty. They cannot be assured that this facility is safe. Were the plant operators trained properly? Is the plant structurally sound? Will seismic activity initiate an irreversible reaction that leads to a core meltdown? These and a host of other unanswered questions shall haunt the Alexander family as they reside in Houston.

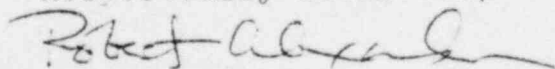
This doubt and uncertainty will not be without a price. The psychological toll exacted upon Mr. Alexander and his family cannot be stated in tangible terms. Will his productivity decline? Will he and his family be able to cope with the added burden of this nuclear menace? Will his children grow up neurotic, knowing no safe environment, but only a day-by-day prayerful existence?

The Applicant must remove these doubts before any construction permits are granted. And only the Petitioner's participation in this proceeding can insure that those doubts are thoroughly espoused.

#### CONCLUSION

The above discussion delineates the Petitioner's interest in the above-captioned proceeding. To safeguard the welfare of himself and of his family, the Petitioner implores the Appeal Board to grant him leave to intervene.

Respectfully submitted,

  
Robert Alexander

cc: Stephen M. Sohinki  
Greg Copeland  
Alan S. Rosenthal