

POOR ORIGINAL

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

Docket No. 50-466

ADDITIONS TO NEW CONTENTIONS I& II
SUBMITTED BY F. H. POPKOFF III



Contention I

In the PSAR, table 1.365 states the design requirements of Allens Creek will call for it to sustain wind-speeds of 110 mph tangential and 60mph translational. This appears to conform to the design basis tornado characteristics for Region II under the NRC Regulatory Guide 1.76. However, Region II covers the West coast and Arizona. For Region I, which covers Texas, the design basis for tornadoes call for maximum wind speed of 60 mph, rotational speeds of 290 mph, and a maximum translational speed of 70 mph. Allens Creek has been obviously designed below the required design basis for tornadoes.

I believe this apparent mistake is unfortunate, since numerous authorities state Texas has more tornadoes than any state of the Union. Dudley Lynch quoted figures that showed Texas had the most tornadoes from 1916 to 1966 (Tornado: Texas Demon in the Wind, Texian Press, 1970, Waco Texas, P. 240.) Barbara Puffy asserts Texas had the highest annual average of tornadoes (109) from 1953 to 1965 (1001 Questions answered About Storms, Dodd, Mead, & Company, 1970, New York, P. 79.) As I noted in my contentions, tornadoes were sighted in the Houston-Balveston Area recently.

This is disturbing when you look at the layout of Allens Creek and note the plans call for all electrical transmission

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to be built naked and with no protection. Conceivably a tornado could come in and wipe out all the transformers, thus affecting important safety equipment.

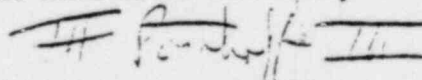
Also the damages at Gulf State Nuclear Project in Mississippi call into the question the ability of non-reactor buildings to resist perforation. I can think of a scenario in which a tornado sets down near the plant, curves around it ripping up all transformers, and sending missiles/ortearing into the control building and diesel generator building, wiping out all power sources to operate safety equipment. Based on the Gulf state experience, a tornado or tornado generated missiles could perforate the rawwaste building, and allow dangerous wastes to be sucked up and strewn about the countryside. Also if a tornado perforates and damages the turbine building, and destroys the turbines, a financial burden might be placed on the applicant because of this andHL&F might be forced into bankruptcy.

Therefore, I contend to counter this, all of the plant be placed underground or covered with a dirt mound.

Contention II

I contend unless ACKCS is buried as suggested in Contention I, it should have a backup system for the ECCS operated by air pressure, hydraulic means, or mechanically.

An American Citizen,



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11-2382 REGULATORY COMMISSION
DEPARTMENT OF SERVICE SECTION
WASHINGTON DC
20555



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Patricia L. ...

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