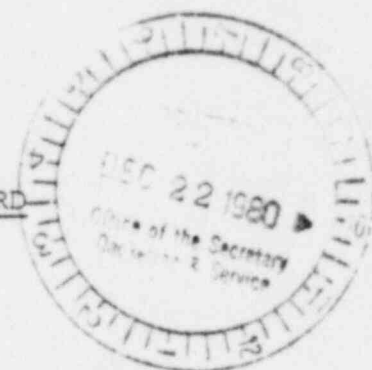


December 18, 1980

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of )  
 )  
HOUSTON LIGHTING & POWER COMPANY )  
 )  
(Allens Creek Nuclear Generating )  
Station, Unit No. 1) )  
\_\_\_\_\_ )

Docket No. 50-466

APPLICANT'S ANSWER IN SUPPORT OF NRC STAFF'S  
MOTION FOR SUMMARY DISPOSITION

Pursuant to 10 CFR §2.749(a), Applicant files this answer in support of the NRC Staff's Motion for Summary Disposition on the consolidated contention (Cumings 9, Griffith 1, Johnston 1 and Lemmer 5) regarding the health effects of low level radiation, as that contention was reworded by the Board and admitted pursuant to its Order of September 26, 1980.

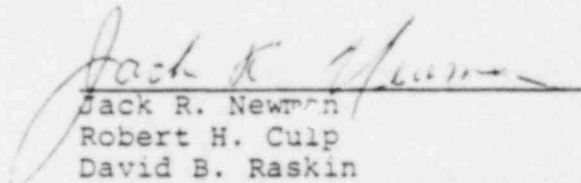
Applicant agrees with the Staff's discussion of the legal standards for summary disposition. It also concurs in the Staff's "statement of material facts as to which there is no genuine issue to be heard." The bases for Applicant's concurrence with the latter and support for the statement of the NRC Staff's affiant, Gotchy, is set forth in the attached affidavit of Dr. Leonard Hamilton.

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Wherefor, Applicant urges the Board to grant the subject Motion for Summary Disposition.

Respectfully submitted,



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