

RELATED CORRESPONDENCE

September 22, 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)

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§

Docket No. 50-466

APPLICANT'S RESPONSE TO POTTHOFF'S THIRD  
SET OF INTERROGATORIES TO HOUSTON LIGHTING &  
POWER COMPANY

In response to the interrogatories propounded by  
Intervenor F. H. Potthoff, III, Houston Lighting & Power  
(Applicant) answers as follows:

INTERROGATORY NO. 1:

In the FES, S.10.4.1.g [sic], it states ACNGS will  
produce  $7.9 \times 10^9$  kwh/year (at 80% average capacity). Does  
Applicant contest this figure? If so, why?

ANSWER:

The cited figures from the FES are consistent with  
figures reported in the ER Supplement at S11.1.1.

INTERROGATORY NO. 2:

In Applicant's Motion for Summary Disposition on  
my Contention 6, Dr. Buck of the Appeals Board is quoted as  
saying ACNGS is designed to produce  $107 \times 10^{12}$  BTUs/year.  
Does Applicant know how Dr. Buck arrived at this figure? If  
so, please give a full explanation. If Applicant does not  
know, how does it know this figure is correct?

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ANSWER:

Applicant objects to this question. Dr. Buck is an officer of the Atomic Safety and Licensing Appeal Board of the Nuclear Regulatory Commission. Applicant has no legal obligation to explain or defend his factual analysis or to do independent analyses to satisfy itself of the accuracy of his work.

INTERROGATORY NO. 3:

In the Motion for Summary Disposition on my Contention 6, Dr. Herbert Woodson says on page 4 of his affidavit [sic] that ACNGS will have a heat rate of "10,000 BTU/KWH." [a] Does Dr. Woodson understand this is due to the fact nuclear fission generates higher temperatures than burning coal or natural gas? [b] Does Applicant understand this?

ANSWER:

[a] Applicant objects to this question. It is not proper to inquire about the opinions of experts through interrogatories to Applicant. If Intervenor had wished to explore Dr. Woodson's reasoning, he should have deposed Dr. Woodson.

[b] The controlling factors for cycle efficiency are the temperature and pressure of the steam. The temperature and pressure of steam in coal or natural gas-fired boilers are typically higher than in nuclear steam generators.

INTERROGATORY NO. 4:

[a] Because of the above, does Dr. Woodson understand that his statement on page 4 of his affidavit [sic] that ACNGS must be replaced by a "yearly thermal input of about  $70 \times 10^{12}$  BTU" isn't necessarily true? [b] Does Applicant understand this?

ANSWER:

[a] See answer 3[a] above.

[b] Applicant has no disagreement with Dr. Woodson's conclusion.

INTERROGATORY NO. 5:

In his affidavit [sic], Dr. Woodson states that there is no evidence that a "biomass farm would be environmentally preferable to a nuclear power plant." Did Dr. Woodson consider the environmental effects of stripmining for uranium when comparing a biomass farm to ACNGS?

ANSWER:

See answer 3[a] above.

INTERROGATORY NO. 6:

In answer to my first set of interrogatories, Applicant states that it has contracted for uranium with Atlas Minerals Corporation. What is their mailing address?

ANSWER:

Applicant objects to this question. It is not relevant to Potthoff Contention 6. Nevertheless, Applicant answers that the mailing address of Atlas Minerals Corporation is 353 Nassau Street, Princeton, New Jersey 08540.

INTERROGATORY NO. 7:

In an answer to my first set of interrogatories, Applicant states that the uranium from Atlas Minerals has already been mined. [a] Does this mean Atlas Minerals only deals in mined uranium? [b] Can Applicant find out where Atlas Minerals gets its uranium? [c] If so, please tell me.

ANSWER:

Applicant objects to this question. It is not relevant to Potthoff Contention 6. Nevertheless, Applicant answers as follows:

[a] Applicant reported previously that "the Atlas Minerals Corporation's uranium has already been mined." This statement means exactly what it says and nothing more.

[b] No.

[c] Not applicable.

INTERROGATORY NO. 8:

[a] Does Applicant intend to buy any and all uranium it can to fuel ACNGS? [b] Does Applicant plan to buy uranium that was strip-mined? [c] Does Applicant plan to buy uranium that was strip-mined?

ANSWER:

Applicant objects to this question. It is not relevant to Potthoff Contention 6. Nevertheless, Applicant answers as follows:

[a] Applicant intends to obtain all the fuel necessary to operate ACNGS for its normal operational life.

[b] - [c] Applicant intends to obtain this nuclear fuel on the open market.

INTERROGATORY NO. 9:

Does Applicant contest the findings of the table on p. S.5-33, FES?

ANSWER:

Applicant objects to this question. It is not relevant to Potthoff Contention 6. Furthermore, the FES is a product of the Staff, and Applicant is not required to explain, defend, agree with, or disagree with it. Nevertheless, Applicant answers that it has no present disagreement with the cited table.

Respectfully submitted,

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COMPANY

DH:4:F



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION


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In the Matter of §  
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HOUSTON LIGHTING & POWER §  
COMPANY § Docket No. 50-466  
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(Allens Creek Nuclear §  
Generating Station, §  
Unit No. 1) §


AFFIDAVIT

THE STATE OF TEXAS §  
§  
COUNTY OF HARRIS §

I, PAUL A. HORN, first being sworn, depose and state that I have answered Interrogatories 6, 7 and 8 of the foregoing Applicant's Response to Potthoff's Third Set of Interrogatories to Houston Lighting & Power Company in my capacity as Project Manager for Houston Lighting & Power Company, and that all statements contained therein are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Paul A. Horn

SUBSCRIBED AND SWORN TO before me on this the  
22 day of September, 1980.

  
\_\_\_\_\_  
Notary Public in and for  
Harris County, Texas

My Commission Expires  
3-7-84

UNITED STATES OF AMERICA  
 NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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 HOUSTON LIGHTING & POWER  
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 (Allens Creek Nuclear  
 Generating Station,  
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Docket No. 50-466

AFFIDAVIT

THE STATE OF TEXAS §  
 §  
 COUNTY OF HARRIS §

I, W. F. McGUIRE, first being sworn, depose and state that I have answered Interrogatories No. 1, 4[b] and 9 of the foregoing Applicant's Response to Potthoff's Third Set of Interrogatories to Houston Lighting & Power Company in my capacity as Manager of the Environmental Protection Department of Houston Lighting & Power Company, and that all statements contained therein are true and correct to the best of my knowledge and belief.

W. F. McGuire

SUBSCRIBED and SWORN TO before me on this the  
22 day of September, 1980

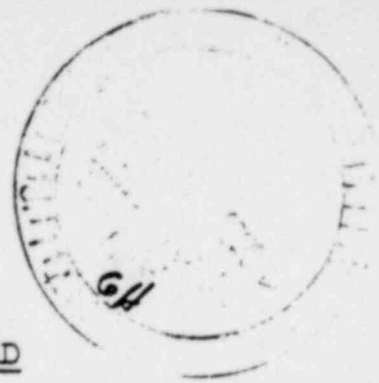
Debra P. Blackburn  
 Notary Public in and for  
 Harris County, Texas

My Commission Expires

3-7-84



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NUCLEAR REGULATORY COMMISSION



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to Potthoff's Third Set of Interrogatories to Houston Lighting & Power Company in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 22nd day of September, 1980.

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County Judge, Austin County  
P. O. Box 99  
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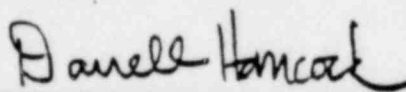
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DH-03-L