UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

REJECTION OF AN INTERVENTION PETITION IN SUBSTANTIAL COMPLIANCE WITH NRC REGULATIONS: A REQUEST FOR APPELLATE REVIEW
by Kathryn Hooker

The Atomic Safety and Licensing Appeal Board is hereby requested to consider whether my petition to intervene in the Allens Creek hearings should have been wholly denied.

The attached brief is submitted to the Appeal Board, in support of my admission as a party.*

February 27, 1979

Respectfully,
Kathryn Hooker

Kathryn Hooker
1424 Kipling
Houston, Texas 77006

*Mr. Steve Sohinki, NRC staff counsel, informed me by phone on February 23 that February 27 is the deadline for filing appeals of the Atomic Safety and Licensing Board Panel's rejection of intervention petitions, marked with the service date of February 12, 1979. I understood that February 27 is the deadline pursuant to the Rules of Practice, 2.710, "Computation of Time"; five days would be added to the 10 days' time for appeal, because service of the rejection notice was by mail, and the date of service itself is not counted.

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The Atomic Safety and Licensing Appeal Board is hereby requested to consider whether my petition to intervene in the Allens Creek hearings should have been wholly denied by the Atomic Safety and Licensing Board Panel.

In support of my admission as a party permitted to argue two contentions, I submit this brief (with the cover notice of appeal) to the Appeal Board.

1. Background of the Appeal

In October 1978, I filed with the Licensing Board an initial intervention petition, setting forth my interest in Allens Creek and how that interest might be affected by results of the hearings. On October 25 an NRC employee phoned to tell me that a prehearing conference was scheduled for November 17. This meant that I had to file the required supplementary petition to intervene (setting forth my contentions with specificity) by November 2. (November 2 was the deadline because of the Rules of Practice's requirement that these contentions be filed "not later than fifteen days prior" to the prehearing.) I protested then to the employee that this was insufficient time to prepare adequate contentions, and asked that she convey my protest to Mr. Sheldon

Wolfe, the Board's Chairman. Then I, Ann Wharton and other petitioners sent mailgrams to Chairman Wolfe protesting the lack of preparation time. I wrote to Chairman Wolfe elaborating on my objections to his rushed schedule. Chairman Wolfe's mailgram to petitioners dated November 1 acknowledged a telephone call and "numerous letters and mailgrams from petitioners" protesting the lack of adequate time to prepare contentions; the mailgram stated that the schedule would nevertheless not be changed. (Chairman Wolfe pointed out that "10 C.F.R. 2.714 provides that additional time for filing the supplement of contentions may be granted" upon the balancing of various factors. But I, Ann Wharton and other petitioners of our acquaintance were hampered in our attempts to intervene not only by lack of time but by our unfamiliarity with NRC regulations. Thus I found Rules 2.714 small comfort, as requiring additional paperwork in correct form, numerous copies, much time and further expense-- with the possibility of rejection of the petition, eliminating me from consideration for admission as a party.

With great difficulty, I submitted my Supplementary Petition to Intervene on November 1. I wrote:

> In filing this supplementary petition to intervene, petitioner wishes to repeat her protest of the brief time allowed for doing so (five working days). (This protest, signed also by Ann Wharton, was sent to Mr. Wolfe by mailgram and letter within the five days the Board allows for protests of an order.) Petitioner notes that other parties to these proceedings (Mr. Jim Scott is one) were given 30 days from the time of receipt of the final environmental impact statement to submit supplemenaary petitions, by the Board Chairman Mr. Wolfe recently replaced. Thus a precedent has been set for a more reasonable time for petitioners to prepare contentions that meet the Board's requirements for specificity. Petitioner notes that Part 2 of the Regulatory Commission's Rules of Practice for

> Domestic Licensing Proceedings is being amended to provide petitioners with 30 days' notice or more of "initial hearings." Although petitioner received no answer to her protest* she has tried to submit adequate contentions in the very short time allotted. Under these circumstances, petitioner hopes that the Board will be lenient in judging the validity of her contentions (10 C.F.R. Appendix A, Section V.b.6: "Boards have considerable discretion in the manner in which they accomodate their conduct of the hearing to local public interest and the desires of local citizens to be heard.

The contentions cited some new evidence, and further new evidence was cited at the prehearing conference of November 17-18. (See below, "Request for the Admission of Two Contentions.")

I attended both sessions of the prehearing conference (taking November 17 off from work as a vacation day) to defend my contentions. Being one of several petitioners who did not have the NRC Staff's criticisms in hand at the prehearing, I was given permission to supplement in writing my oral defense. This I did on November 21 (Supplement to Oral Defense of Contentions), within the five days allotted me. In the Supplement I noted that Mr. Steve Sohinki, an NRC Staff lawyer, had remarked on November 18 at the prehearing (citing a Commission rule) that persons unfamiliar with regulatory proceedings should not be held to the same standards as those who are familiar with procedure.

On December 22, TexPIRG (since admitted as a party to these proceedings) asked the Atomic Safety and Licensing Board to certify several questions to the Appeal Board for its ruling. (TexPIRG's Motion for Certification of Questions to the Appeal Board.) I submitted a Statement in Support of

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*Chairman Wolfe's mailgram, sent in response to petitioners' protests, was not received until November 2— the deadline for filing supplementary petitions.

TexPIRG's Motion to Certify Questions to the Appeal Board (January 5, 1979). TexPIRG's questions challenged the Board's requirement that contentions submitted under the Board's Corrected Notice of Intervention Procedures (published Sept. 11, 1978) be based on evidence unavailable before December 1975. In urging immediate certification of the questions to the Appeal Board, I stated:

> 1. TexPIRG's questions raise the crucial issue of whether this narrowly circumscribed proceeding will meet the demands of 10 C.F.R. for a "public hearing" on the granting of construction licenses for commercial nuclear power plants. The issue arises because the Licensing Board placed stringent limits on evidence on the basis of an incomplete hearing held several years ago, in which no issues of health or safety were considered, other than those pertaining to site selection. This incomplete initial hearing had only one intervenor— the Texas Attorney General— and even he withdrew. The initial hearing was never concluded because Houston Lighting & Power then withdrew, and proceedings were suspended. The Licensing Board would now credit that incomplete and inadequate proceeding with the scope and authority that would justify severe restrictions on evidence. An Appeal Board ruling now on TexPIRG's questions would benefit all parties; should the ruling be delayed, and should the Appeal Board ultimately rule in TexPIRG's favor, new hearings might be required.
>
> 2. TexPIRG's questions raise the issue of whether these narrowly circumscribed proceedings will provide an adequate public record, particularly on health and safety issues, as required by 10 C.F.R. This issue is also crucial because the partial initial decision, issued following the incomplete hearings which were suspended, did not deal with health and safety issues other than those related to site selection; yet on the basis of that partial decision, the Licensing Board would sharply limit the range of permitted evidence. A delayed Appeal Board ruling on the adequacy of the public record might require new hearings.
>
> 3. Without thorough consideration of the full range of health and safety issues, unhampered by severe restrictions on evidence, grave errors may occur.

On January 11, 1979, the NRC Staff filed its Response to TexPIRG

Motion for Certification, in opposition.

In January, The Nuclear Regulatory Commission announced that studies of alternate sites for the nuclear power plant were required. A public meeting was held on the issue, in addition to the non-public meeting between NRC staff and representatives of Houston Lighting & Power. Results of these studies are not yet available, although the discovery period preceding the hearing has already begun and several contentions involve alternate sites.

On January 19, the NRC withdrew its endorsement of the Reactor Safety Study (WASH-1400), until then the primary source of risk data used by the Commission in its deliberations. The Commission announced its intention of making a thorough study of its regulations to determine which of them are "tainted" by reliance on the rejected report. On January 30, I filed a Petition for Suspension of the Proceedings. The petition argued that "(c)ontinuation of the Allens Creek proceedings would be unwise under these circumstances [subsequent to rejection of the Reactor Safety Study]; decisions reached in haste might subsequently be overturned, resulting in costly repetition of the proceedings." The petition also raised these issues:

> 2. The NRC's rejection of the Reactor Safety Study calls into question the validity of portions of Houston Lighting & Power's safety and environmental studies. The Commission must determine to what extent these are fatally based on the rejected study. For example, HL&P's Final Supplement to the Final Environmental Statement lists "Class 9" accidents (which would include core melts) as "not considered" (p. S.7-1). The Commission should determine whether this statement is based on the flawed risk assessments of the Reactor Safety Study; if so, additional safety data might be required (through Class 9 accidents).
>
> 3. The Commission will doubtless be reviewing the original

> proceedings on the Allens Creek plant, to ascertain whether those proceedings and the Partial Initial Decision on Allens Creek remain valid despite rejection of the Commission's primary risk assessment study. Suspension of the proceedings would be prudent pending these and other reconsiderations made necessary by rejection of the Reactor Safety Study.

Finally, the petition stated that should the Atomic Safety & Licensing Board fail to answer the issues raised within 30 days, I would request immediate certification of the question to the Appeal Board, deeming my petition denied.

On February 2, TexPIRG filed a motion "for admission of two contentions previously abandoned due to Class 9 accident prohibition based on Rasmussen Report (RSS)." TexPIRG stated that NRC staff had persuaded it to drop the two contentions in September 1978, informing TexPIRG that the Rasmussen Report (WASH-1400) showed that the likelihood of Class 9 accidents was so remote that they did not have to be considered.

In its Order of February 16, the Board stated that since it had determined on February 9 that I was not to be a party, it did not "entertain this Petition by a non-party and it is herewith denied." The Board added:

> It should be noted that, in our Order Ruling Upon Intervention Petitions, we rejected Texas PIRG's Additional Contention 5, the thrust of which was similar to Ms. Hooker's Petition. Therein, however, we did pose the following questions to be addressed by the Staff at the forthcoming hearing: (1) Did the Staff use WASH-1400 in arriving at its conclusions regarding environmental risks, as stated in S.7 of the Supplement to the Final Environmental Statement?, (2) If so, do these conclusions need to be modified as to the result of recent criticisms (Lewis Report) of WASH-1400 and NRC's recent policy statement regarding same?

The Board's Order Ruling Upon Intervention Petitions (with service date February 12) granted that I had standing and "an interest which may be affected by the proceeding." However, the Board rejected each of my five contentions, for various reasons. The remainder of this petition supports

2. Appeal for Admission as a Party

The Board has granted that I have "an interest which may be affected by the proceeding." 42 USCA 2239 would seem to support my admission as a party on this ground alone: "In any proceeding under this chapter for the granting of a construction permit the Commission shall grant a hearing upon the request of any person whose interest may be affected by the proceeding and shall admit any such person as a party to such proceeding (emphasis added)."

The preceding "Background of the Appeal" shows that I did undergo strain, inconvenience and some financial loss in striving in good faith to meet the Board's requirements for admission as a party. I filed all papers on time, when there was very little time; I sought to understand— and did follow— unfamiliar rules on short notice. And the "Appeal for the Admission of Two Contentions," below, shows that I did cite "new evidence" in the contentions in question, pursuant to the Board's Corrected Notice of Intervention Procedures published September 11, 1978.

In the preceding "Background of the Appeal," I noted that the NRC's stated policy is not to hold those unfamiliar with NRC regulations to the same standards as those familiar with them. Similarly, in his Order Ruling Upon Intervention Proceedings, Chairman Wolfe wrote of another petitioner (p. 20): ". . . while the Petitioner's supplementary petition does not meet the strict requirements of §2.714(a)(2), we do not hold a pro se petitioner to those standards of clarity and precision to which a lawyer might reasonably be expected to adhere." And as noted above, the Board has "considerable discretion" in the manner in which it accommodates its conduct of the hearing to "local public interest

and the desires of local public citizens to be heard."

The "more lenient standards for those unfamiliar with Commission regulations were surely not formulated for citizens who are only to appear at the hearings to make "limited statements." Indeed, there are no regulations for such statements. One has only to come and speak. The leniency toward non-experts must have been adopted as policy to permit greater public input in the Licensing Board's decision-making. Yet in Exxon Nuclear Company, Inc. (Nuclear Fuel Recovery and Recycling Center), Sept. 30, 1977, Chairman Wolfe stated that a petitioner was "an intelligent person who takes a commendable interest in civic matters," she was "not a lawyer nor possessed of scientific or technical training." Nor did she "have available to her some type of professional assistance in connection with the evidentiary presentation. . . ."

I urge the Appeal Board to state whether one must be a lawyer, a technical expert, or rich enough to hire counsel to be admitted as a party. If this is so, then I and many other petitioners have been wasting our time and money in this process. If these indeed are the standards, I urge that they be incorporated in the Rules immediately. I note that party status in these hearings has been limited to four attorneys.

Portland General Electric Company, et al. (Pebble Springs Nuclear Plant, Units 1 and 2), December 23, 1976, could provide a basis for the admission of "ordinary citizens" as parties. Quoting a previous decision, the Board stated:

> . . . we wish to underscore the fundamental importance of meaningful public participation in our adjudicatory process. Such participation, performed in the public interest, is a vital ingredient to the open and full consideration of licensing issues and in establishing public confidence in the sound discharge of the important duties which have been entrusted to us. (Northern States Power Company (Prairie Island Nuclear Generating Plant, Units 1 and 2), CLI-75-1, 1 NRC 1, 2 (1975).

Portland also states:

> Permission to intervene should prove more readily available where petitioners show significant ability to contribute to substantial issues of law or fact which will not otherwise be properly raised or presented, set forth these matters with suitable specificity to allow evaluation, and demonstrate their importance and immediacy, justifying the time necessary to consider them.
>
> In permitting adjudicatory boards to exercise discretion in ruling on questions of participation, we recognize that judicial criteria for intervention as a matter of right may, in a particular case, exclude petitioners who would have a valuable contribution to make to our decision-making process.

3. Appeal for the Admission of Two Contentions

I urge the Appeal Board to consider the admission to the proceedings of my contentions numbered 2 and 5, as making some contribution to a public record on health and safety issues related to the Allens Creek project. There are indeed very few health and safety issues in contention-- nor were any litigated prior to the Partial Initial Decision. I beg the Appeal Board to consider, in weighing its decision, the background of the appeal as described above as well as the cases cited in this petition. Contentions 2 and 5, attached, do present "new evidence" to support their acceptance. (Contention 4 is also attached, as it lists some source material for Contention 5.)

CONTENTION 2. This contention raises the issue of problems in assuring the integrity of the applicant's proposed new Emergency Core Cooling System. Assuming the burden of proof to be on the applicant (10 C.F.R. citation supra), I ask whether HL&P can prove that the ECCS in the proposed new plant is virtually failure-proof. Because of the unimaginably terrible consequences of a core melt-- the unavoidable outcome of failure of the ECCS -- no expert in power plant operations has publicly stated that anything less than near-perfection is required of the ECCS. The proposed site's proximity to Houston, one of the five fastest-growing and most densely populated cities in the United States, renders this issue of crucial importance. I therefore beg the Board to admit this issue for full consideration in the hearing, under the Board's mandate to consider the health and safety of the public (10 C.F.R.2.104.b.1.iv) and

pursuant to its broad discretionary powers in the conduct of hearings (10 C.F.R. Appendix A, Section V.b.6).

Under this contention, my major argument will be that HL&P has not complied with NRC criteria with respect to proven safety and quality assurances of a major component. For example, the Commission's criterion 10 C.F.R.50.46.a.1 is not adhered to. That regulation states: "ECCS cooling performance shall be calculated in accordance with an acceptable evaluation model, and shall be calculated for a number of postulated loss-of-coolant accidents of different sizes, locations, and other properties sufficient to provide assurance that the entire spectrum of loss-of-coolant accidents is covered." (Emphasis added.) Yet HL&P, seeking to demonstrate its qualifications for operating a nuclear power plant through the production of endless reams of material at ratepayers' expense, gives this thoughtful answer to the issue of core melt (included under the NRC's "class 9" accident description): "Not considered." (Final Supplement to the Final Environmental Statement, S.7-1.)

The implications of HL&P's response of "Not considered" to postulated accidents that the NRC rates "class 9" (most serious) become fully apparent when one considers the concern with which Congress viewed such possibilities. It passed the Price-Anderson Act to insure nuclear power plant operators against liability for property damage, loss of life and injury in the event of a major power plant accident, to a maximum of hundreds of millions of dollars. The Act was passed because private insurance companies, considering the risks of such accidents too great, refused to provide insurance against them. The NRC has incorporated the Price-Anderson Act into its regulations (10 C.F.R. Part 40).

Nor does the mere volume of data provided by HL&P provide assurance of compliance with the NRC's regulation calling for testing of components. Many of the core cooling system components appear to be tested by the prime contractor for those components— General Electric. (See for example the Preliminary Safety Analysis Report, I.5.1.2.5.) Testing of safety components by the prime contractor for those components is prima facie a gross conflict of interest casting doubt both on the validity of test results themselves and the qualifications of HL&P to operate a nuclear power plant. HL&P's delegation of tests involving pressure-suppression containments to the manufacturer, GE (PSAR I.5.1.2.5) casts the gravest doubt on the integrity of the system when considered in conjunction with controversy within the AEC as to its safety. (See the memo of September 20, 1972, from Dr. Stephen Hanauer, a senior member of the AEC regulatory staff, to other staff members. He stated his belief that the disadvantages of pressure-suppression containments over other containments were "preponderant" and recommended discouraging their use. Joseph Hendrie, another staff member, wrote in response that to ban such containments "could well be the end of nuclear power" and "would create more turmoil than I can stand thinking about." The Union of Concerned Scientists' press release of 9/18/78.) I might add that although this particular controversy originated well before 1975, pressure-suppression containment problems have still not been satisfactorily resolved. New evidence in this regard has been published in the NRC's Annual Report 1977pp. 19-20 citing changes made and tests to be done on GE pressure-suppression containments. The Report notes that no Mark III containment (Allens Creek type) is yet operational,

and seeks to assuage doubts as to its safety with the vague and short comment: "Changes will be made in all containments-- whether of the Mark I, II or III type-- if tests and analyses indicate their structural capability is deficient." It is quite late in the day to make such an unspecific, unsubstantiated assertion with regard to the Allens Creek Project. The lack of safety assurance for the containment system of the new model plant implied in the above quotation indicates the requested license should be denied, pursuant to the Board's mandate to consider issues of public safety and health (10 C.F.R. citation supra).

I would like also to argue that HL&P has not met the NRC's criteria for quality control, as set forth in 10 C.F.R. Part 50, Appendix B: "As used in this appendix, 'quality assurance' comprises all those planned and systemic actions necessary to provide adequate confidence that a structure, system or component will perform satisfactorily in service." This argument would be made in conjunction with evidence cited supra that HL&P, in its components testing program, used as the tester to manufacturer of the parts tested, a prima facie conflict of interest casting doubt on test results. For this reason also the license request should be denied.

Nor does HL&P comply with the NRC's requirement that it present adequate plans to cope with emergencies. 10 C.F.R. Part 50, Appendix E, states: "The Preliminary Safety Analysis Report shall contain sufficient information to assure the compatibility of proposed emergency plans with facility design features, site layout, and site location with respect to such considerations as access route, surrounding population distributions and land use." The section cites these and other items to be de-

scribed was a minimum": the organization for coping with emergencies; arrangements with local, state and Federal governmental agencies; and measures to be taken within and outside the site boundary." I was unable to locate a discussion of such plans for dealing with the most serious postulated emergencies in HL&P's PSAR. Therefore, the license should be denied.

CONTENTION 4* raises the issue of transportation of radioactive wastes to another site for disposal. My concerns are that the particularly stringent record of safety required for transporting such wastes from the proposed site area could not be achieved.

Under this contention, I would challenge the applicant to meet the burden-of-proof requirement of 10 CFR Section V.c in the area of safe transport of radioactive wastes; the requirement should be met in conjunction with new information, nonexistent before 1976, regarding additional highways to be built in the site area, unexpected and accelerating population density in the area with accompanying increased vehicular traffic, and increased projections for air traffic in the area. Petitioner is not required to show how these might pose hazards in applicant's transportation of radioactive wastes. Rather, the applicant, under burden-of-proof requirements, must demonstrate that the additional hazards (in common sense) these new conditions pose will not hamper safe transportation along our Texas highways. Although lack of time precludes discussion of these arguments in greater detail here, I will cite some

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*This contention was originally misnumbered 5.

of the source materials that would be used to substantiate this contentions These sources all contain new information, unavailable prior to 1976, of vital relevance to the new plant proposal:

1. Growth Options, Charles Sevino et al., Rice Center for Community Design, Houston, Texas, 1978. A study of growth patterns in Houston and its surrounding area. The study shows, among other things, the following: the highest rate of population growth in the region studied was southwest of Houston, in the area of the proposed plant; population increases in the region as a whole are accelerating; the rate of increase of vehicular traffic in the region as a whole is accelerating.

2. Twenty Year Program, published by the Houston-Galveston Regional 1978. Shows new highways, many in planning only after 1975, to be built in the vicinity of the proposed site. The impetus for the upsurge in highway construction plans was a large grant of money by the Texas State Legislature to the State Department of Highways in 1977.

3. Houston-Galveston Regional Transportation Study, July 1978. The study presents new information in showing accelerating vehicular traffic over the last three years, unanticipated before 1976. A startling finding of the study is that the increased vehicular mileage is fairly evenly divided between urban and rural areas— and there were nearly 72.2 billion vehicle trips in the area studied during 1977. Common sense indicates that this would pose an unanticipated burden on applicant in the transport of wastes; unanticipated because original population projections published by applicant both before and after 1975 are sharply at variance with these projections and those of the Houston Chamber of Commerce (published yearly

in bulletin form), as well as those of the aforementioned Twenty Year Program.

4. Population projections of the Houston Chamber of Commerce, 1978 issuance, for the Houston/Galveston Standard Consolidated Statistical Area (projections for this area to 1990), at variance with population projections used by applicant. I regret that I am unable to give a detailed analysis of HL&P's original projections and how they are at fault, but the extremely rushed schedule of these hearings precludes anything other than a statement made with reasonable specificity.* Further argument would come at the full hearing. I would wish, however, to cite as an example of HL&P's faulty anticipation of growth in population density in the zone of concern Table 2.2 in the Final Environmental Statement submitted by HL&P in support of approval of this particular site in 1974. The table projects "cumulative populations" within 50 miles of the proposed site as being 2,710,000 by 1990. Sales and Marketing Management Magazine, in a story printed in the Chronicle October 31, 1978, quoted a survey predicting growth of Houston alone to a population of 2,887,000 by 1982. The Houston Chamber of Commerce's current projection of population for Harris County alone for 1985 is 2,932,000. (Chamber of Commerce Research Division, RES 140307, 1978.) Obviously, when Fort Bend County, Austin County, Wharton, and other counties within the 50-mile zone of concern are added to the Chamber of Commerce projections, the original demographic projections used in support of original site approval are grossly inaccurate.

CONTENTION 5* reopens the issue of the suitability of the Allens Creek site. A reopening of this issue is countenanced by the NRC itself. The Partial Initial Decision (43 F.R. 40328) states that the findings have

*Misnumbered Contention 6 in original submission.

demonstrated no reason why the site is not suitable but that "the Appeal Board's memorandum and order of December 9, 1975, in affirming the Licensing Board in its partial initial decision, stated that these findings by the Licensing Board in its partial initial decision are subject to later revision should further developments or new information warrant." Thus even the Allens Creek site is not a res judicata.

Although I wish to retain site suitability as an issue separate from my other contentions, so that possible rejection of other contentions will not foreclose my raising this issue, I will use sources cited above and others to show that population, transportation, distance from major population center, and other factors calculated in support of the initial site approval were inaccurate. The license should therefore be denied.

February 27, 1979

Respectfully Submitted,
Kathryn Hooker
Kathryn Hooker
1424 Kipling
Houston, Texas 77006

CERTIFICATE OF SERVICE

I hereby certify that copies of this Request for Appellate Review have been served on the following agencies and individuals on the Docket No. 50-466 Service List by deposit in the U.S. mail, first class, this 27th day of February, 1979:

Sheldon J. Wolfe, Esq.
Richard Lowerre, Esq.
Docketing & Service Section, U.S. Nuclear Regulatory Commission
Atomic Safety & Licensing Appeal Board
Jack Newman, Esq. (Lowenstein, Newman, Reis & Axelrad
J. Gregory Vopeland, Esq. (Baker & Botts)
Jim Scott, Esq.
Carro Hinderstein, Esq.
Brenda McCorkle, Esq.
John Schreffler, Esq.

Kathryn Hooker
Kathryn Hooker