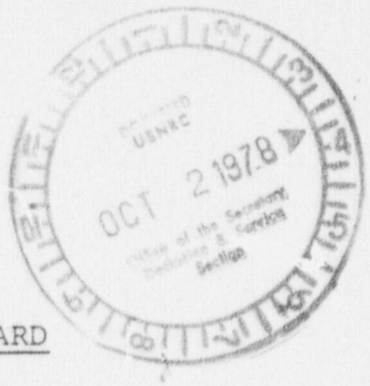

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
HOUSTON LIGHTING AND POWER COMPANY	)	DOCKET NO. 50-466
	)	
(Allens Creek Nuclear Generating Station, Unit 1)	)	

APPLICANT'S RESPONSE TO AMENDED PETITION FOR LEAVE TO INTERVENE FILED BY JOHN F. DOHERTY AS AN INDIVIDUAL AND IN BEHALF OF THE ARMADILLO COALITION OF TEXAS (ACT) HOUSTON CHAPTER, PURSUANT TO A.S.L.B. ORDER OF AUGUST 14, 1978

The Applicant opposes the above-referenced Amended Petition.

I. Interest

Even when considered in conjunction with earlier pleadings by the same petitioners, the Amended Petition does not meet the requirements of 10 C.F.R. § 2.714, as amended.[1/] The Amended Petition fails to cure the essential defect of Mr. Doherty's initial petition of June 26, 1978, in that it does not identify either the interest of the petitioners or the manner in which their specific interests may be affected by this proceeding. The consideration of the matter of interest requires separate analyses of the various petitioners: ACT, Mr. Doherty, and the three individual persons alleged to be members of the ACT.

1/ 43 Fed. Reg. 17798 (April 26, 1978).

As to ACT, the NRC staff pointed out in its response of July 17, 1978, to the initial petition that:

> No information has been provided regarding the organization or its members. There is no indication in the petition that Mr. Doherty has been authorized by members of the Coalition to represent them in this proceeding. The purpose of the organization is not specified. (p. 2)

Not one of these defects is remedied in the Amended Petition. The only light shed on ACT is that it is a "non-profit organization dedicated to the control of nuclear power and weapons . . . ." No other information is furnished to establish that ACT exists as a legal entity; that it has significant numbers of members who do, in fact, reside near the proposed plant; the size of its membership; the names and/or addresses of the persons who comprise the petitioning organization; or that Mr. Doherty is authorized to represent that organization. On the basis of similar pleadings, an organization has been denied status as party intervenor. Consumers Power Company (Midland Plant, Units 1 and 2) Memorandum and Order of the Licensing Board (August 14, 1978).

What remains to be evaluated is a petition based on the interest of Mr. Doherty and three other individuals.

First, as to Mr. Doherty, his home in Houston is 46 miles from the proposed plant site. Aside from an alleged interest as a ratepayer, which is not within the zone of interests to be protected by the Atomic Energy Act or the National Environmental Policy Act,[2/] no facts are alleged which differentiate Mr.

2/ Tennessee Valley Authority (Watts Bar Nuclear Plant, Units 1 and 2), ALAB-413, 5 NRC 1418, 1421 (1977); Portland General Electric Company, et al. (Pebble Springs Nuclear Plant, Units 1 and 2), ALAB-333, 3 NRC 804, 806 (1976).

Doherty's interest in the general health and safety effects set forth in the petition from those of the population at large. This factor is particularly important in view of the distance between Mr. Doherty's home and the plant site. The distance is beyond the range which the Appeal Board has indicated may be sufficient to show an interest to raise safety questions. Northern States Power Co. (Prairie Island Nuclear Generating Plant (Units 1 and 2)), ALAB-107, 6 AEC 188, 190 (1973). Although the Appeal Board has not established a hard-and-fast rule in this regard,[3/] clearly, a petitioner situated in Mr. Doherty's position (almost 50 miles from the site) must do something more than allege impacts totally undifferentiated from those imposed upon the general population. In this instance, there is simply no allegation in the petition of an interest different from that of the population at large. Accordingly, Mr. Doherty must be denied status as a party-intervenor.

It remains therefore to consider the position of the three named individuals Elaine Carpenter, Paul Rowe, and Wayne Collins. All are alleged to be ratepayers of Houston Lighting & Power, which even if true is insufficient to show interest and support intervention for the reasons discussed above. All reside in Houston, according to the petition, "within 37 miles of the proposed plant." None has come forward,

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3/ A footnote in a 1977 ALAB decision suggests that 50 miles might be appropriate. Tennessee Valley Authority, supra, 5 NRC at 1421 footnote 4.

however, to specify how his or her particular interests are affected by the proceedings. Ms. Carpenter and Mr. Collins allege no facts other than their addresses which might be said to associate them with the plant. It is alleged that Mr. Rowe has used a park in the vicinity of the plant and "intends to visit in the future." However, occasional visits of this type create, at best, connections which are tenuous and remote and do not meet the requirements of 10 C.F.R. § 2.714. 4/ It is also alleged that Mr. Rowe owns real property which might be affected by an accidental release of radioactivity but there is absolutely no description of the property or its location. In short, these three individuals' claim of a right to intervene is based upon the sole fact of residence at the outer reaches of the distance which the Appeal Board has acknowledged might be sufficient to support a claim of interest in safety issues. We submit that the mere recitation of one's address at a 37-mile distance, standing alone, cannot suffice. Simply put, residence at a distance 37 miles from the plant, without specification of a particular individual concern constitutes an interest so attenuated as to be insufficient to support standing.

Having failed to establish a congnizable interest, petitioners ACT, Doherty, Carpenter, Collins and Rowe should be denied admission as party-intervenors. Applicant would not oppose their required participation as limited participants under 10 C.F.R. § 2.715.

4/ Public Service Company of Oklahoma, Black Fox Station Units 1 and 2, LBP 77-17, 5 NRC 657, 666 (1977), aff'd in pertinent part ALAB-397, 5 NRC 1143, 1150-51.

II. Contentions

Introduction

Before discussing each contention, it is worth recalling that the Board's order of August 14 requires that contentions be based on changes in the plans for ACNGS or new evidence or information developed since the date of the Appeal Board decision in this proceeding (December 9, 1975).

With the exception of contention 2, not a single contention refers to specific changes in the plans for ACNGS. Of the remaining contentions, all are either vaguely or specifically related to one of three sources of "new information or evidence" */ as follows:

(1) Recent unidentified studies of the effects of low level radiation. (Contentions 2, 7 and 22).

(2) Testimony in February 1976 by three former General Electric engineers before a Congressional committee. (Contentions 12, 13, 16 and 25.)

(3) A document, NUREG-0460 issued by the NRC in April 1978, dealing with "Anticipated Transients Without Scram for Light Water Reactors" (ATWS) (Contentions 11, 14, 15, 17, 18, 19, 20, 24 and possibly others undiscernible because of the vagueness of the petition.)

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*/ "New evidence or new information" within the meaning of the Board's Order of August 14 means that the new information in fact was not previously available. It does not include information which was previously known or which could have been reasonably discovered.

None of the foregoing qualifies as new information or evidence.

(1) The somatic and genetic effects of low level radiation have been the subjects of continuing investigation over the past twenty-five or more years. A host of such studies existed prior to 1975 and could have been relied upon by the petitioners in framing contentions in 1974-75. The addition of one more study or opinion to the continuing body of scientific literature is not "new evidence or new information" within the meaning of the Board's order.

(2) The testimony of the former GE engineers, although given in February 1976, was almost wholly devoted to problems which had been identified in the open literature many years earlier and, specifically, matters which had been widely known to be under consideration and study by the NRC staff for many years. As noted in testimony by NRC Chairman Anders before the same Committee:

> The Commission directed the NRC technical staff to examine the specific technical points that have been raised to determine whether further regulatory actions might be needed. The resulting voluminous documentation, which responds in detail to the issues raised and which has been submitted for the record, indicates that the safety issues enumerated in the last two weeks of testimony heard by this Committee have been aired previously. They are largely generally applicable issues which have been raised before by the AEC, NRC, Advisory Committee on Reactor Safeguards or others, and are a matter of public record.

Investigation of Charges Relating to Nuclear Reactor Safety: Hearings before the Joint Congressional Committee on Atomic Energy, 94th Cong., 2d Sess. 285 (1976). The ATWS problem discussed immediately below is a good example. Other references to information long available and bearing on those allegations based on the testimony of the GE engineers are provided in the specific responses to individual contentions.

(3) The document, NUREG-0460 is apparently relied upon as the "new evidence or information" for a number of contentions. NUREG-0460 deals with ATWS and even the most cursory reading of the document shows that it is merely the latest in a continuing series of studies on the subject. As the opening paragraph of the study states:

> The staff position on . . . ATWS has been a subject of continuing controversy since its publication in the "Technical Report on Anticipated Transients Without Scram for Water-Cooled Reactors," WASH-1270 in 1973. The status of the implementation of this position, including the staff's review of each reactor manufacturer's analysis methods and results was published in 1975 in a series of reports. (p. i, emphasis added.)

Although ATWS has been, and continues to be investigated by the NRC, clearly the problem was not "discovered" after the Appeal Board decision in this proceeding. There was extensive information on the subject in the open literature which would have furnished the basis for contentions at an earlier date.

Finally, it should be noted that the subject matter of virtually every safety contention so advanced by ACT was the subject of specific consideration in the 1974 Safety Evaluation Report (SER) on ACNGS. A table correlating the contentions to sections of the SER is attached as Appendix A.

In summary, the statement of contentions is almost entirely "bootstrapped" by the utilization of the latest references in the literature to matters of long-standing consideration. In every such case, ample information existed for formulating contentions in the 1974-75 period.

Itemized Contentions

Contentions 1-6

In paragraphs 1-6, petitioners make certain statements relating to the routine low level radioactive releases from ACNGS. Petitioners apparently contend either that (1) the routine low level releases from the plant will not be "as low as practicable"*/ as required by Appendix I to 10 C.F.R. Part 50 or that (2) Applicant should be required to meet standards for routine releases more stringent than those required by Appendix I.

If the claim is that the routine releases from ACNGS will not meet the numerical requirements for releases set forth in Appendix I, petitioners fail to provide any basis for this allegation, and make no attempt to specify in what respect either the routine gaseous or liquid releases will fail to meet the numerical requirements of Appendix I. Therefore, such allegations do not satisfy the "specificity" requirements of 10 C.F.R. § 2.714(b).

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*/ The terminology in Appendix I is now "as low as reasonably achievable."

If petitioners are claiming that the routine releases from ACNGS must be lower than [illegible] ments of Appendix I, such a claim is a cha[illegible]mission's regulations and, absent some [illegible]s not permitted in this licensing proc[illegible].F.R. § 2.758.

Finally [illegible]tions in this grouping appear to rely on some un[illegible]d studies relating to the effects of low level radiatic[illegible] As discussed on page 6, such studies are performed continuously; the fact that one study was released "since December 1975" cannot be used as the prop to establish that these contentions are based on "new" information or evidence.

Contention 7

Petitioners allege in paragraph 7 that recreational use of the cooling lake by the public should be prohibited "because of the insidious danger of radio-active effluents being undetected in the cooling lake . . . ." This allegation is impermissibly vague. It is unclear whether petitioners are claiming that the radiation monitoring equipment at ACNGS will not function properly or that any radioactive releases to the cooling lake will cause the lake to become unfit for recreational use. Regardless of which interpretation is placed on the contention, petitioners have failed to specify what new evidence or new information has arisen with respect to this allegation since the Appeal Board's Memorandum and Order of December 9, 1975. As noted previously, reliance on one in a series of continuing studies on the effects of low level radiation is insufficient to establish that a contention is based on new information or evidence. Many other earlier studies are to the same

effect; the problem was not "discovered" following the Appeal Board decision in this proceeding.

Contentions 8-10

Petitioners allege in paragraphs 8-10 that "tests" show that fuel rods will "melt and crumble" at 147 cal./gm. and, therefore, that design safety limits for fuel rods which are above this figure are inadequate. The allegations in these paragraphs are based upon some unidentified "tests" and are therefore impermissibly vague. Petitioners do not identify the types of "tests" which were conducted nor give any specific reference to the report of these "tests." The vagueness of the assertion also defeats any attempt to discern whether it is based on truly new information or evidence. Finally, petitioners make no attempt to relate the results of these unidentified "tests" to the safe operation of the ACNGS and, therefore it is impossible to discern what safety contention petitioners seek to have litigated. Furthermore, the general subject matter recorded in Contention 10 has long been a matter of public record and was specifically addressed in a letter of October 21, 1975, from the NRC to the Joint Congressional Committee on Atomic Energy. 2 Hearings Before the Joint Committee, supra, pp. 1447, 1469.

Contentions 11, 17 and 20

In paragraph 11, the allegation is made that petitioners are not adequately protected against Anticipated Transients Without Scram (ATWS) events. In paragraphs 17 and 20, petitioners

seem to allege that certain ATWS events may occur which could lead to accidents including a core meltdown but the bases for these contentions (the initiating mechanisms) are unspecified. Moreover, there is no indication of why these transients without scram are likely to occur at ACNGS.

More important, however, as pointed out above, the contentions are not based on new information or evidence or changes in ACNGS plans. The ATWS problem was identified well before 1975. The NRC Staff and the ACRS have long had ATWS under active consideration since the Staff first published a report on ATWS in 1973 (WASH-1270).*/

Contentions 12 and 13

In paragraphs 12 and 13, petitioners allege that problems will arise as a result of vibration of the Local Power Range

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*/ In fact ATWS contentions were litigation in other licensing proceedings prior to 1975. See, Duke Power Co. (Catawba Nuclear Station, Units 1 and 2), LBP-75-34, 1 NRC 626, 638-42 (1975), aff'd, ALAB-355, 4 NRC 397 (1976). In the Catawba proceeding, the Licensing Board found that Applicant was committed to meeting the Staff's ATWS requirements and that straight-forward engineering solutions are available to meet any design modifications necessary to limit the probability or consequences of an ATWS. 1 NRC at 641. Similarly, in the case of ACNGS, Applicant will comply with applicable requirements imposed by the NRC relating to ATWS. (SER p. 7-3, Sec. 7.2.1).

Monitors (LPRM) and the steps taken to reduce that vibration. Petitioners cite the congressional testimony of the GE engineers in February 1976 and a 1977 book by Webb as support for the allegations that new information on these contentions has been discovered since December 1975. In fact, there is no indication in the former GE engineers' testimony before the Joint Committee that LPRM failure as a result of vibration was discovered after December 1975. Indeed the testimony itself indicates that in 11 BWR-4 plants the vibration problem had been met by plugging of spaces and some derating to ensure that postulated accident consequences would not be exceeded. Hearings before the Joint Committee on Atomic Energy, supra, at pp. 506-08; see also id., at p. 206. The derating of the BWR's occurred before December, 1975. See e.g., Iowa Electric Light & Power Co. et al. (Duane Arnold Energy Center) Order for the Modification of License, 40 Fed. Reg. 28679 (July 8, 1975). Thus, there is no "new" information or evidence on the subject matter sought to be litigated.*/

Contention 14

Petitioners' allegation in paragraph 14 that the ECCS has not been adequately tested to ensure that the core spray will reach all fuel rods is a direct challenge to the Commission's

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*/ The Applicant notes that a Licensing Board in another case recently rejected a contention based upon Dr. Webb's book and the testimony of the former GE engineers as "too nebulous to litigate." See, Ohio Edison Co. (Erie Nuclear Plant, Units 1 and 2) ASLB Order Subsequent to the First Prehearing Conference (August 18, 1977).

ECCS regulations set forth in 10 C.F.R. § 50.46 and Appendix K to Part 50 and, absent a special showing, is not a proper contention for this proceeding. 10 C.F.R. § 2.758. See Erie, supra, at p. 7 where the Board rejected a similar contention.

Contention 15

In paragraph 15, petitioners claim that the "design of obtaining core spray water from the suppression pool following exhaustion of the condensate storage tank is an unnecessarily high risk . . . ." There is no mention of the type of risk. Further, it is unclear whether petitioners are alleging that the ACNGS design will not meet the Commission's ECCS requirements or are attempting to challenge the ECCS criteria. Moreover, petitioners do not attempt to relate the assertions in subparagraphs (a) and (b) to the contention first stated in the paragraph. The allegations in this paragraph are unduly vague and Applicant is unable to discern the nature of petitioners' safety concern. For example, contrary to the assertion in paragraph 15a the ACNGS suppression pool water will contain no chromate compounds. Finally, beside some general reference to "NUREG-460" (presumably NUREG-0460) which actually deals with ATWS, petitioners fail to specifically identify what new evidence or new information has arisen since 1975 to support their contention as required by the Board's August 14 Order.

Contention 16

In paragraph 16, petitioners claim that personnel working on equipment in the containment building may be endangered by the design of the Mark III containment system. Petitioners

do not refer to any specific features of the design; they fail to identify what new evidence or new information has arisen since 1975 which forms the basis for this contention. Other than a general reference to testimony by former GE engineers, petitioners have made no attempt to comply with the Board's order of August 14.

If Petitioners are attempting to raise issues in this paragraph relating to the Mark III containment system, they have failed to cite new evidence or information arising since December 1975. In fact, the NRC Staff has been following GE's Mark III containment system test program relating to hydrodynamic loads on the pressure suppression pool since 1972. In April 1975, letters were sent to all applicants and licensees, including the Applicant, requesting a review of their designs against these loadings on the pressure suppression pool. Hearings before the Joint Committee on Atomic Energy, supra, at p. 1504. Therefore, problems relating to the dynamic loads on the pressure suppression pool were known long before December 1975.

Contentions 18 and 19

In paragraphs 18 and 19, petitioners allege that pressure from blowdown following a transient may cause cracks in the containment building permitting (1) a release of gaseous core contents and (2) a release of the reactor fission product inventory in the event of a vessel breach. Petitioners fail to identify specifically what new evidence or new information is relied upon as required by the Board's August 14 Order. Peti-

tioners' simple reference to NUREG-0460 without any identification of portions of that report which support these allegations or a clear statement that such phenomena were not known prior to 1975 fails to meet the requirements of the Board's Order.

To the extent the contention is postulated on a pressure vessel failure, it is inadmissible without the requisite showing of special circumstances. Consolidated Edison of New York (Indian Point Unit 2) CLI-72-29, 5 AEC 20 (Oct. 26, 1972). Even more importantly, it appears that these contentions relate to class 9 accidents which the Commission has previously determined to be inappropriate for litigation in individual licensing proceedings. See, Carolina Environmental Study Group v. U.S., 510 F.2d 796, 798-800 (D.C. Cir. 1975).

Contention 21

In paragraph 21, petitioners' allegations relate to fuel rods containing plutonium. These allegations are irrelevant and inappropriate to this proceeding since the Applicant does not seek any license from the NRC for use of new fuel rods containing plutonium.

Contentions 22 and 23

Petitioners allege in paragraph 22 that the dose estimates in Table 7.2 of the FES are low because the calculations assume that there will be no dose contamination after the first 24-hour period. Petitioners make no showing that this assertion is based on new evidence or new information developed since 1975. To the extent the second sentence of the contention seeks to remedy the defect, it utterly fails since the effects of low level radiation (as mentioned in the second sentence) bear no relationship to petitioners' contention.

In paragraph 23, petitioners allege that Table 7.2 of the FES is inaccurate because Applicant has not filed an "evacuation plan." Applicant has in fact filed an emergency plan consistent with the requirements of 10 CFR Part 50, Appendix E. (SER, Sec. 13.3). Similar to contenton 22, petitioners make no attempt to show that there is any new evidence or new information to support this allegation which was developed since 1975.

Contention 24

In paragraph 24, petitioners claim that recirculation pump overspeed during a LOCA will cause missiles in the containment which will endanger personnel and disable equipment. Petitioners again fail to show what new evidence or new information exists to support this allegation as required by the Board's Order of August 14. Petitioners' simple reference to "NUREG-0410" is not sufficient identification of new evidence or new information to support this allegation.

In fact, recirculation pump overspeed is a problem which the NRC long recognized and studied for many years prior to December 1975. This subject was discussed in the SER (p. 5-16), and the Applicant has committed to the generic resolution of this issue (PSAR p. 5.5-5). Likewise, in its March 12, 1975 letter to the ACRS, the NRC Staff noted that BWR recirculation pump overspeed during a LOCA was an item pending for resolution since December 1972. 1 Hearings Before the Joint Committee, supra, at pp. 635-36.

Contention 25

Petitioners claim in paragraph 25 that the rod control system "can be circumvented by applicant during reactor

operation creating the possibility of rod drop accident." Petitioners' claim is unduly vague.

This contention is copied from the testimony of the three former GE employees before the Joint Committee on Atomic Energy, supra, but it is out of context and, therefore, impossible to understand as a contention. The former GE engineers were talking about various electronic "patches" designed to procedurally control the pattern of rod withdrawal and block withdrawal of high worth rods out of sequence. Their argument was related to the efficacy of certain electronic "patches." Hearings, supra, at p. 513. At issue is whether certain systems - Rod Worth Minimizer (RWM), the Rod Pattern Control System (sometimes known as the Rod Sequence Control System, (RSCS) and the Rod Block Monitor (RBM) - are effective to prevent a Rod Drop Accident. As to the first system (RWM), the ACNGS does not have it. As to the second system (RSCS), its effectiveness has been the subject of long standing concern by the NRC staff and GE and is reflected in published studies. The subject was discussed in the November, 1974 SER on ACNGS, wherein the Staff excepted the Applicant's commitment (as expressed in a letter dated July 10, 1974), to meet any requirements mandated by the generic resolution of this matter. (SER, p. 7-12). The reference to the Rod Block Monitor (RBM) in the list of "patches" simply reflects a lack of understanding of the system, since the RBM has no relation to the rod drop accident. Hearing Before the Joint Committee, supra, at p. 762. The contention, insofar as it relates to prevention of rod drop accidents is not based on new information or new evidence.

Contention 26

Petitioners' allegation in paragraph 27 that Applicant should be required to purchase the shares of certain participants in the South Texas Project who are allegedly "abandoning" their interests in the Project is nothing more than speculation. The participants in the South Texas Project continue to own their shares in that Project and have not divested themselves of their shares. The contention is without foundation and should be dismissed.

Contentions 27 and 28

In paragraph 27, petitioners allege that the projected capital costs of ACNGS are too low and, therefore, it will not be less expensive than a coal-powered or lignite-powered plant. In paragraph 28, petitioners claim that a lignite plant will generate electricity more cheaply than ACNGS. The allegations are nothing more than bald assertions with no basis to support them. For example, petitioners make no attempt in paragraph 27 to relate the alleged increase in the capital costs of the Commanche Peak facility to the projected costs of ACNGS. Moreover, Petitioners have failed to identify specifically the new evidence or information relied upon. They cite only "recent discoveries and research" to support their contention on the costs of the lignite alternative. This is insufficient to meet the requirements of the Board's Order of August 14.

Even more importantly, these contentions take issue with the staff's analysis of the cost of generating electricity with a coal plant versus a nuclear plant, without mention of the

relative environmental effects of these alternatives. As a result, the contentions are virtually irrelevant in this proceeding and should not be allowed.

The Appeal Board has recently noted:

> The passage of the National Environmental Policy Act increased our concern with the economics of nuclear power plants, but only in a limited way. That Act requires us to consider whether there are environmentally preferable alternatives to the proposal before us. If there are, we must take the steps we can to see that they are implemented if that can be accomplished at a reasonable cost, i.e., one not out of proportion to the environmental advantages to be gained. But if there are no preferable environmental alternatives, such cost-benefit balancing does not take place. Manifestly, nothing in NEPA calls upon us to sift through environmentally inferior alternatives to find a cheaper (but dirtier) way of handling the matter at hand. In the scheme of things, we leave such matters to the business judgment of the utility companies and to the wisdom of the State regulatory agencies responsible for scrutinizing the purely economic aspects of proposals to build new generating facilities. In short, as far as NEPA is concerned, cost is important only to the extent it results in an environmentally superior alternative. If the "cure" is worse than the disease, that it is cheap is hardly impressive.

Consumers Power Co. (Midland Units 1 & 2), ALAB-458, 7 NRC 155, 162-63 (footnotes omitted). Without even an allegation of the environmental superiority of coal generation, the contention should be disallowed.

Contention 29

Petitioners allege in paragraph 29 that the health effects to personnel in coal fuel cycle contained in Table S-D15 of the Draft Supplement must be changed. Petitioners state that these figures "are predicated on authorities being unable to rectify illegal conduct by United States mine operators for the life of

the proposed plant." This contention is totally unsupported by any factual assertion, much less any new evidence or new information. Indeed, this contention borders on the frivolous.

Respectfully submitted,

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APPENDIX A

ACT Contention Numbers	Corresponding ACNGS Safety Evaluation Report Section(s)
1 thru 6	11.1, 11.2 and 11.3
7	11.5
8 thru 10	4.4
11	7.2.1
12 and 13	1.8
14	1.8
15	7.2.1
16	6.2
17	6.2.1.6 and Supp. 6.2.1.2
18 and 19	6.2.1, 6.2.1.1 and 6.2.1.2
20	7.2.1
23	13.3
24	5.4.1
25	15.3.1 and Supp. 15.2 and 15.3

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)	§	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Response in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 28th day of September, 1978.

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