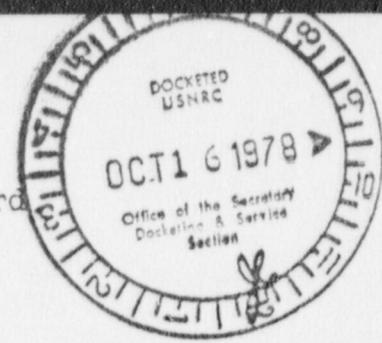


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U.S. Nuclear Regulatory Commission

Before the Atomic Safety and Licensing Board

Re: Houston Lighting and Power)
Allens Creek Unit 1.)

Docket 50 -466

I, D. Marrack, 420 Mulberry Lane, Bellaire 77401, seek and petition to intervene under the ammended notice of intervention 10 CFR - 1 Sept. 1978.

I wish to see that this project is thoroughly reveiwed and that my interests are protected.

1. This application should be treated as a new application since the applicant de facto withdrew his original application.
11. The testimony presented at the public hearing 11 March 1975 should be reveiwed and reassessed. It is not apparent that this applicant learnt anything from the hearing and has made no apparent attempt to mitigate the adverse matters raised at that time. I participated in that hearing. It is significant that EPA ranked the EIS for this project ER-2, ie. that they considered it contained insufficient information and that they had environmental reservations. This position still stands.
111. Amongst the matters not addressed in the original application EIS or its supplement are :-

- A. Power Lines.
 - 1) The impact of these high voltage lines on the Barker Recreation Area now being implémented and in particular the Balloon Port, Model Airplane flying facility and the Nature Preserve.
 - 2) The human, wildlife and biological impact and hazards of the induced voltages at ground level in the area under these high voltage lines.
 - 3) The impact of these obstructions on the migratory wildfowl of the area and also on the non- game avians. The area is a major winter habitat for migratory waterfowl.
- B. Costs.
 - 1) The costs ofdecommissioning and long term protection of the rubble and/or the site, of this proposed plant are not adequately expressed in the cost analysis. These costs may continue for in excess of tens of thousands of years.

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2) The costs of nuclear fuel waste processing, disposal, monitoring and guarding until "safe" radioactivity levels for allnucliides have been reached.

3) the impacts of not co-mingling the costs to the user of electricity from the proposed plant with the costs of electricity from the rest of the applicants generating system.

~~BB~~ Radiation Hazards arising from-

- 1) Transport of fuel elements to and from plants.
- 2) Storage of fuel elements.
- 3) Decommissioning and removal of the proposed plant after it has served its useful life.

IV. Secondary Impact.

One of the legal requirements of Environmental Impact Statements is an analysis of the secondary effects of a project ie. events that can be anticipated to happen or be accelerated if the project is undertaken. This proposal is sited deliberately to encourage changes in economic structure in adjacent areas particularly residential and industrial or prime food producing areas. The documents for this project are negligent in this matter.

V. Alternatives.

- 1) The Trinity River basin and other sites are not adequately discussed as alternative sites.
- 2) Other means of providing energy - services, if they are required, are not adequately addressed.

V1. The total modified project must be addressed in the supplementary EIS. The cooling lake factors and other factors suggest that additional generating units will be proposed for the site. This application must address the fully developed project under the U.S. Supreme Court ruling of 1973 or the applicant must stipulate now that at no time will the applicant, or his successors, apply for additional generating units of any sort at or in association with this site.

V11. The blatant discrepancies and inconsistencies between various sections of the FEIS of November 1974 and the Supplement EIS and within these documents destroys their credibility as a whole. The applicant should be required to provide an internally consistent and complete set of statements regarding this project before this matter is proceeded further with.

D. Marrant

