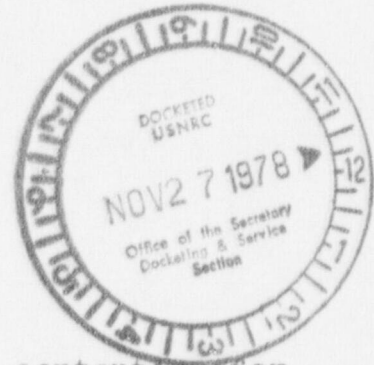


In the Matter of  
Houston Lighting & Power Company  
Allens Creek Nuclear Generating Station, Unit 1  
Docket No. 50-466

NRC PUBLIC DOCUMENT ROOM

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ANSWER TO APPLICANT'S  
AND STAFF'S RESPONSES



On Nov1, 1978, I mailed in my "fully researched" contentions for intervention on the ACNGS. On Nov, 17 & 18, I attended the pre-hearing conference, where I was supposed to reply to applicant's and NRC staff's responses. At the time I wasn't ready to reply (and frankly I don't believe I am as ready as I wish at this time) due to the short short short time allowed me to research my contentions. However Chairman Wolfe was kind enough to give me more time to reply, and this is my response.

As I said at the conference, I shall drop contention 4 concerning floods & their effects on the ACNGS. I have also submitted a new contention for approval. Now I shall reply to the objections to my contentions:

contention 1- Both the applicant and staff object to this contention because they say it is vague and contains no new information. When I wrote the contention I didn't know the the Grand Gulf Nuclear Plant under construction is Mississippi was damaged by a tornado within the past two years. Supposedly NRC regulations would insure an atom plant would withstand such damage, but sometimes people build plants that aren't within the specifications and somehow get by. The plant may have been approved as conforming to NRC regulations when it was not. The ASLB should investigate if this was what happened, and see what steps can be taken to insure

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this does not happen at the ACNGS.

This brings me to the second objection of staff and applicant. They say my contentions are vague. They are just as vague as the ACNGS-PSAR. In discussing protecting the plant from tornado missiles, all it says is the plant will conform to NRC regulations. How? Will the applicant use a special type of cement that can withstand a telephone pole weighing 1490 lbs. at a velocity of 266 ft./sec? Will it be reenforced with steel bars? Do they have figures comparing the strength of concrete, reenforced concrete, brick, etc. to withstand the discussed missiles? Where are the facts and figures? Will there be a special design of the building which will increase the wall strength? Until these questions are answered, I believe my contentions still stand.

contention 2- Both the applicant and staff allege this contention presents no new evidence or information. However the ACNGS\* PSAR doesn't discuss the effect industrial development encouraged by the ACNGS will have on ground water use and subsidence. If the plant is built, it could encourage industry to move into the area. For example when I was around the South TEXas Nuclear Project, a Mr. Paul peters told me on Octo. 11, 1978, that Dow Chemical, and other industries, planned to erect several industrial parks near the STP reactor, to take advantage of the electricity. This may not happen near Wqllis, but ther is a trend of industries moving out into the countryside looking for cheap land. If several industrial plants set up near ACNGS, they would need groundwater for industrial operations, and thus increase the subsidence in the area. The PSAR does not discuss this so my contention stands.

contention 3- The applicant states this contention is pure speculation and both the applicant and staff state my conten-

. . . tion is based on no new information. Somehow they have missed a statement in my contention: " . . I was surprised to read this year of an earthquake, 2.3 on the Richter scale, occurring in West Texas . . ." This was in October of this year, which makes it definitely new information. The PSAB tries to say there is no possibility of earthquake on the Gulf Coast, but they list several earthquakes occurring in Texas, a number close to the site. As I understand geology, all land areas are active to certain degrees, and no area is safe from an earth quake. New York, West Germany, and the Ohio river Valley are several 'safe' areas I've read of where earthquakes have occurred. Earthquakes at the ACNGS are improbable but not impossible, and I believe it is wise to "err on the side of caution." My contention stands.

Once again I'd like to thank Chairman Wolfe for this extra time to reply. I hope the ASLB will accept my contentions.

An American citizen,

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