

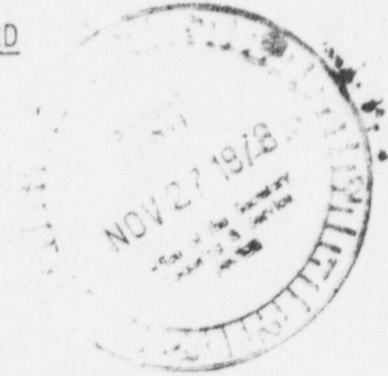
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November 22, 1978

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))	



NRC STAFF RESPONSES TO CONTENTIONS OF EMANUEL BASKIR,
JEAN-CLAUDE DeBREMAECKER, KATHRYN HOOKER, LEE LOE, D. MARRACK
F. H. POTTHOFF III, JOHN R. SHREFFLER, JOSEPH C. YELDERMAN

Pursuant to the Staff's commitment to the Board during the special prehearing conference in the captioned matter held on November 17, 1978, the Staff submits this pleading to formalize in writing its oral responses to the contentions of the above-named Petitioners. We do not repeat the contentions below, but our responses are numbered to correspond to the numbering used by each Petitioner.

EMANUEL BASKIR

1. This contention sets forth a vague concern with the appropriateness of calculations of radiological effluents because of temperature inversions and tropical rainstorms. Since site meteorology is taken into account in performing calculations of doses pursuant to 10 CFR Part 50, Appendix I, the contention lacks specificity in failing to point out in what respects

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the analysis is inadequate. To the extent the contention takes issue with Appendix I limits, it represents an impermissible challenge to the regulations (10 CFR §2.758). Further, it is based upon a false premise, since the "tall stacks" are no longer used for dilution of effluents, as alleged. Finally, the contention is not based upon new information, and could have been raised prior to December 9, 1975.

2. This contention deals with spent fuel storage. Section 9.2 of the SER discusses this matter; releases from the spent fuel pool are also considered in Section S.5.4 of the Final Supplement to the FES in calculating Appendix I releases. No inadequacies in these analyses are alleged; the contention therefore lacks specificity. In addition, no new information or change in plans for the station is alleged which would warrant the admission of this contention as an issue in controversy.

3. This contention deals with ultimate waste disposal. It is not a proper subject for litigation in this forum, since the Commission's policy is that reactor licensing may continue in the absence of a presently available method of ultimate waste disposal.^{1/}

^{1/} Natural Resources Defense Council, Inc., "Denial of Petition for Rulemaking," Docket No. 50-18, 42 FR 34391 (July 5, 1977). This position was recently upheld by the United States Court of Appeals for the Second Circuit in NRDC v. NRC ____ F.2d ____, 11 ERC 1945 (July 5, 1978).

4. This contention concerns the impact of transportation of waste on the people who live near transportation routes. To the extent Petitioner is alleging that the environmental impact of transportation is not adequately addressed, the contention runs afoul of the 10 CFR §51.20(g) of the Commission's regulations (Summary Table S-4), and constitutes an impermissible challenge to that regulation. See 10 CFR §2.758. In addition, 10 CFR Parts 71 and 73 contain specific requirements for transportation of wastes, including protection against accidents. No allegation has been made that any Commission regulation will not be met. In addition, the contention does not appear to be based upon new information.

5. This contention questions whether the Applicant will have a sufficient supply of qualified technical personnel to operate the plant. The contention is defective since it is speculative and vague in that it does not define "sufficient pool of trained manpower." Further, it is not based upon new information.

6. This contention questions whether earthquakes have been taken into consideration in designing the plant. This matter is covered extensively in the SER (Section 2.5), Appendix G to Supplement I of the SER, and the Partial Initial Decision at 2 NRC 804-11. There is no new information suggested to warrant reopening of this issue; no inadequacy in the Staff's or Board's analysis is alleged.

7. This contention raises the issue of provisions for final decommissioning of Allens Creek. First, no plan has been put forth for final decommissioning of the proposed facility. This matter is considered in detail near the end of the reactor's useful life. Second, the costs of decommissioning, as a general matter, were discussed in the Final Supplement to the FES (Section S.10.2.3). No inadequacies are alleged in that discussion; the contention is therefore fatally vague. Third, the subject of decommissioning criteria is now the subject of proposed rulemaking. 43 FR 10370 (March 13, 1978). Licensing Boards should not accept in individual proceedings contentions which are or are about to become the subject of general rulemaking.^{2/}

For the above reasons, the Staff believes that Mr. Baskir has failed to set forth at least one valid contention as required by 10 CFR §2.714. His petition for leave to intervene should be denied.

^{2/} Potomac Edison Power Company (Douglas Point Nuclear Generating Station, Units 1 and 2), ALAB-248, 8 AEC 79 (1974).

JEAN-CLAUDE DeBREMAECKER

Mr. DeBremaecker's sole contention deals with the need to address the question of ultimate waste disposal in this proceeding. For the reasons set forth above in response to Baskir Contention 3, the Staff believes that this contention should be excluded as a matter in controversy, and that Mr. DeBremaecker's petition should be denied.

KATHRYN HOOKER

1. This contention seeks assurances that "normal" low-level radiation will not induce cancer. The contention is either an impermissible challenge to 10 CFR Parts 20 and 50 (Appendix I), which establish limits on dose levels, or it fails for lack of specificity and basis in arguing that the Applicant will not meet the above-mentioned regulations. In either case it should not be admitted as a matter in controversy.
2. This contention seeks assurances that the ECCS is "virtually failure proof." The contention should be rejected for three reasons. First, the Atomic Energy Act and the Commission's regulations require reasonable, not absolute, assurance that a nuclear facility will operate safely. Secondly,

10 CFR §50.46, Appendix K contains acceptance criteria for the ECCS which the Applicant must meet in order to receive a construction permit or operating license. The contention is either an impermissible challenge to that regulation (10 CFR §2.758) or fails for lack of specificity and basis because it is not alleged in what manner the Applicant's design does not comply with §50.46. Finally, the contention is not based upon new information; it could have been raised at the inception of this proceeding.

3. This contention seeks an analysis of ultimate waste disposal and environmental impact of storage of spent fuel at the site. To the extent the contention deals with ultimate waste disposal, it is objectionable for the reasons stated in response to Baskir Contention 3, supra. To the extent it deals with spent fuel storage, the doses to individuals from plant operation are calculated pursuant to Appendix I to 10 CFR Part 50. This analysis is discussed in Section S.5.4 of the Final Supplement to the FES. Further, accident calculations have been done for a spent fuel handling accident (Final Supplement, Section S.7). No inadequacy is alleged in that discussion, nor is there any assertion that the Applicant will not comply with applicable Commission regulations. There is thus no basis for the contention. Further, no new information is suggested which would warrant examination of spent fuel releases in this proceeding.

5. This contention deals with environmental impacts of transportation of radioactive waste. For the reasons stated in response to Baskir Contention 4, this matter should not be admitted as an issue in controversy.

6. This contention asserts that the plant should not be built because of the increasing population in the Houston area. The contention should be excluded because it is vague. Petitioner fails to ascribe any specific significance to the population rise. There is no Commission regulation which prohibits the siting of a nuclear facility solely on the basis of the population in the area. This concern is really not a separate contention but, in the Staff's view, forms the basis for the balance of Ms. Hooker's contentions.

For the above reasons, the Staff believes that Ms. Hooker has failed to set forth a valid contention as required by 10 CFR §2.714. Her petition for leave to intervene should be denied.

LEE LOE

Petitioner's first contention concerns the dangers from low-level radiation which have been discovered in the last few years. For the reasons stated in response to Hooker Contention 1, the Staff believes that this contention should not be allowed.

Ms. Loe's second contention, in the Staff's view, amounts to an assertion that if mistakes will happen, the plant should not be licensed. As we have discussed, supra, the Atomic Energy Act and the Commission's regulations do not demand absolute assurance of safety; they require reasonable assurance. Through the Commission's defense-in-depth policy, nuclear facilities are designed to cope with the accidents about which the Petitioner is concerned. The Applicant will comply with all of the regulations; Petitioner does not allege otherwise. The contention should not be allowed.

The third contention seeks consideration of ultimate waste disposal in this proceeding. For the reasons discussed in response to Baskir contention 3, the contention should not be allowed.

The last contention asserts that nuclear power is more costly than other forms of energy. This contention is not based upon new information and should be excluded on this ground alone. More importantly, the Appeal Board has determined that economic cost of nuclear power need only be considered if it is demonstrated that an environmentally superior alternative exists. No feasible alternative has been alleged to exist by Ms. Loe. Further, there is not even a basis provided for the assertion that nuclear power is more expensive than other forms of power. The contention should be excluded.

For the above reasons, the Staff believes that Ms. Loe has failed to set forth a valid contention as required by 10 CFR §2.714. Her petition for leave to intervene should therefore be denied.

D. MARRACK

Dr. Marrack's contention IIIA which concerns power lines is without basis and lacks specificity. As previously stated, the Applicant has cancelled plans to build lines on route 3A which was proposed to lie at the edge of Barker recreation area. This cancellation is documented in the HP&L ER §3.9 and the FES Supplement §3.4 (p. 3-12). As explained by Applicant in the ER, HP&L plans to construct the Addicks substation and interconnecting transmission facilities in 1981 to meet the system requirements but these lines are not dependent on the Allens Creek plant. The allegation that transmission lines from the proposed plant would create a hazard to humans and wildlife, is vague and lacks any specific description of the risk alleged or how it might occur. The Applicant's ER describes large rights of way varying from 220 feet to 260 feet and the FES Supplement Sections S.4.1.4 and S.5.1.2 address possible effects of transmission lines. The question of obstructions to migratory wildfowl was previously addressed in Applicant's ER §5.6.4. There is no new information stated as a basis for this contention.

Dr. Marrack withdrew contention "B" concerning costs and radiation hazards (Tr. 590-591).

Contention IV concerning secondary impacts of the plant is without basis since this subject was included in the Licensing Board's decision (PID) in 1975. Houston Lighting and Power Co. (Allens Creek Nuclear Generating Station, Units 1 & 2) 2 NRC 776, 789 and 790 (1975). Dr. Marrack submits no new information which would serve as basis to change the Board's findings on this matter. Further, it is vague in that no secondary impacts are identified which the petitioner alleges were inadequately addressed.

Contention V concerning alternatives of site and energy source are without basis, non-specific and vague. No reasons are set forth for alleging that alternative sites and energy sources have been inadequately addressed by the ER and EIS; nor is there any new information presented which warrants the re-examination of these issues.

Contention VI is not a contention but a demand that a possible future additional unit for the site be explored now. As explained at the special prehearing conference (Tr. 592), the Applicant and Staff would be required to perform an environmental analysis on any future proposed unit, and the Commission would be required to issue an EIS for the unit. There is no basis for this contention.

In Contention VII Dr. Marrack alleges discrepancies and inconsistencies between the FES and its Supplement but fails to specify in any way the particular sections or subjects to which he refers. This contention is vague and unspecific and not valid for litigation.

For the above reasons, the Staff believes Dr. Marrack has failed to submit one valid contention proper for litigation in this proceeding as required by 10 CFR §2.714. His petition for leave to intervene should be denied.

F. H. POTTHOFF, III

1. This contention questions whether tornados have been considered in the design of Allens Creek. The subject of tornado missiles was discussed in both the SER (Section 3.5.4 and Table 3-1) and its Supplement (Section 3.5.4). Petitioner has not challenged the adequacy of the tornado missile spectrum presented in Table 3-1 of the SER. This contention could have been raised prior to December 9, 1975.

2. This contention alleges that cracks in the reactor building could result from the continuing subsidence problem in the site area. This contention

could also have been raised well prior to December 9, 1975. Not only was subsidence and its safety implications covered in both the SER (p. 2-36) and its Supplement I (pp. 2-23 to 2-50) but the Licensing Board made specific findings in the partial initial decision which considered the phenomenon, including future demands for water. 2 NRC 776, 806-809.

3. This contention questions whether earthquakes have been considered in the design of Allens Creek. For the reasons given in response to Baskir Contention 6, this contention should not be admitted as a matter in controversy.

4. This contention questions whether floods have been considered in the design of Allens Creek. Again, the contention could have been raised well prior to December 9, 1975. Flood protection was discussed in Sections 2.4.2 and 3.1.1 of the SER. No inadequacies are alleged in that analysis. Therefore, there is no basis for the contention.

For the reasons stated above, the Staff does not believe that Mr. Potthoff has set forth a valid contention as required by 10 CFR §2.714. Therefore, his petition for leave to intervene should be denied.

JOHN R. SHREFFLER

1. The Staff opposes Contention 1 concerning evaporation of water from the cooling lake because it is not based upon new information, indeed, potential evaporation has been decreased since the original plan for a larger lake.

2. The second contention related to hydrogen explosions in another reactor has not been shown to be related to Allens Creek specifically nor has the analysis by Applicant and Staff been alleged to be defective in any way. See: Gulf States Utilities (River Bend Station, Units 1 and 2) 6 NRC 760, 773 (1977).

3. This contention expresses a concern related to the effects of a small pipe leak in the ECCS. This contention is not based upon new information and could have been raised prior to December 9, 1975. Secondly, pipe breaks are analyzed as part of the analysis done pursuant to 10 CFR §50.46 (acceptance criteria for ECCS). In addition, the Final Supplement to the FES specifically considers doses from pipe break accidents (Table 5.7.2). No inadequacies in the Staff analyses are alleged; no allegation is made that the Applicant has not complied with the applicable regulations. The contention should not be allowed.

4. Contention 4 lacks specificity as to nature of the alleged inadequacy of the reactor pedestal and further, does not articulate a basis for the suggestion that the pedestal may weaken or break in the event of a LOCA (a design basis accident).

5. Geothermal energy as an alternative source raised in Contention 5 was addressed in the FES Supplement (S.9-6), and the mention of a present demonstration project in Brazaria County does not provide an adequate basis for the contention; petitioner has not challenged the Staff's conclusion that geothermal energy "is not an available alternative energy source for the proposed 1200 MWe of baseload generating capacity."

6. This contention alleges a need for "additional margins for growth" in the rad-waste system. It is vague in not explaining "additional margins for growth," lacks basis in failing to explain why additional margin is needed, and lacks specificity in failing to identify any portion of the Staff's or Applicant's analysis which is inadequate. Further, this contention is speculative in postulating possible future changes in regulations for radioactive emissions.

7. Contention 7, based on geological faulting discovered at the North Anna (Virginia) site shows no relation to the Allens Creek site, other than the fact that both sites have (and will have) man-made lakes. The subject of earthquakes and geological faults were addressed both in the SER (Section 2.5) and its Supplement I (Appendix G) and in the Licensing Board's Partial Initial Decision in 1975 (2 NRC 776, 804, et seq.). No new information is provided as basis to disturb that opinion.

For the above reasons, the Staff opposes all the contentions of Mr. Shreffler as invalid and without proper basis for litigation in this proceeding. His petition for leave to intervene should therefore be denied.

JOSEPH YELDERMAN

Dr. Yelderman alleges that three matters have not been considered in the cost-benefit balance. They are numbered 3(a), 3(b) and 3(c).

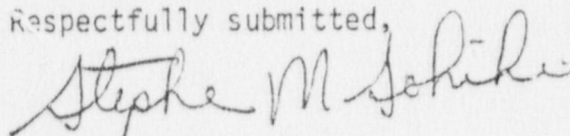
3(a) This is not a contention per se but a statement of fact regarding the growing population in the Houston area. No basis is articulated for the implication that increased population has not been considered by the Staff. Indeed, it is considered in Tables **S.2.1** and **S.2.2** of the Final Supplement to the FES.

3(b) This contention alleges that radiation doses to the population outside a 50-mile radius of the plant have not been considered. First, this matter could have been raised prior to December 9, 1975. Secondly, Petitioner has obviously not reviewed the Final Supplement to the FES, which sets forth the U. S. population-dose commitment for the Allens Creek site (Table S.5.15, p. 5-28). There is no basis for the contention, since no inaccuracies in the figures in the cited Table are alleged.

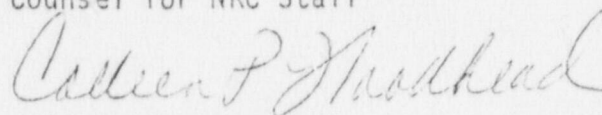
3(c) This contention alleges that "safe" levels of low-level radiation have been found recently not to be safe. For the reasons stated in response to Hooker Contention 1, this issue should not be admitted as a matter in controversy.

For these reasons, the Staff believes that Dr. Yelderman has failed to set forth a valid contention as required by 10 CFR §2.714. Therefore, his petition for leave to intervene should be denied.

Respectfully submitted,



Stephen M. Sohinki
Counsel for NRC Staff



Colleen P. Woodhead
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 22nd day of November, 1978

November 22, 1978

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))

NRC STAFF POSITION REGARDING STANDING OF EMANUEL BASKIR,
JEAN-CLAUDE DeBREMAECKER, KATHRYN HOOKER, LEE LOE, D. MARRACK
F. H. POTTHOFF III, JOHN R. SHREFFLER, JOSEPH C. YELDERMAN

In their original pleadings in the captioned matter filed pursuant to this Board's "Corrected Notice of Intervention Procedures" dated September 1, 1978, all of the above-named Petitioners, with the exception of Dr. Marrack and Mr. DeBremaecker, alleged residence within 15-40 miles of the proposed facility and general concerns with the impacts from normal operation and/or accidental occurrences at the plant. For the reasons stated in the "NRC Staff Position Regarding Standing of Petitioners for Intervention" dated November 16, 1978, we believe that these Petitioners have alleged an interest which may be affected by this proceeding pursuant to 10 CFR §2.714.

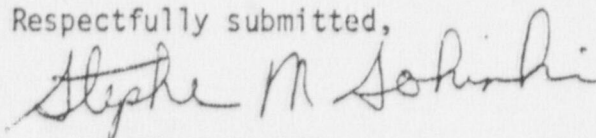
However, the Staff believes that neither Dr. Marrack nor Mr. DeBremaecker have demonstrated such an interest.

Dr. Marrack's assertion of interest rests on his membership in the Houston Audubon Society and other nature groups as well as activities to establish national and State preserves in Texas. He states that he is a user of the Barker recreation area which will be adversely impacted by transmission lines from the proposed facility. Dr. Marrack's membership in nature groups is not an interest related to construction of the proposed facility in that he shows no nexus between his membership and any direct personal injury possible as a result of construction of the plant. The Applicant has cancelled previous plans to build transmission lines at the periphery of the Barker recreation area so that no standing to intervene may be asserted on this basis. Dr. Marrack states no more personal particular interest than that of the general public. The Staff believes Dr. Marrack has failed to show standing to intervene, the requirements for which were set forth in Portland General Electric Co. (Pebble Springs Nuclear Plant, Units 1 and 2), CLI-76-27, 4 NRC 610 (1976).

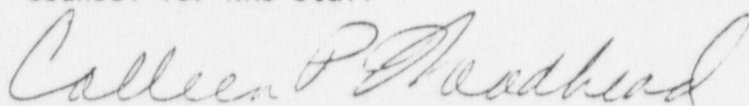
Mr. DeBremaecker alleges that the transportation of radioactive waste will have a direct impact on him. He fails, however, to state where he lives either in relation to the plant or any proposed transportation routes for shipment of radioactive waste. No other injury in fact is alleged. Therefore, his allegations remain vague and speculative, and the Staff believes that he has failed to comply with the requirements of 10 CFR §2.714 and Pebble Springs, supra.

The contentions of the above-named Petitioners are addressed in a separate pleading.

Respectfully submitted,



Stephen M. Sohinki
Counsel for NRC Staff



Colleen P. Woodhead
Counsel for NRC Staff

Dated at Bethesda, Maryland,
this 22nd day of November, 1973.

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 1)

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Docket No. 50-466

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF POSITION REGARDING STANDING OF EMANUEL BASKIR, JEAN-CLAUDE DeBREMAECKER, KATHRYN HOOKER, LEE LOE, D. MARRACK, F. H. POTTHOFF III, JOHN R. SHREFFLER, JOSEPH C. YELDERMAN" and "NRC STAFF RESPONSES TO CONTENTIONS OF EMANUEL BASKIR, JEAN-CLAUDE DeBREMAECKER, KATHRYN HOOKER, LEE LOE, D. MARRACK, F. H. POTTHOFF III, JOHN R. SHREFFLER, JOSEPH C. YELDERMAN" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk by deposit in the Nuclear Regulatory Commission internal mail system, this 22nd day of November, 1978:

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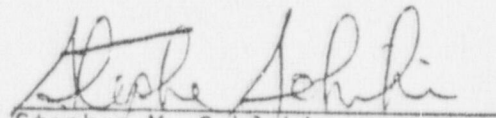
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