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OFFICE OF THE SECRETARY
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ADJUDICATIONS STAFF

February 14, 2002

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

TENNESSEE VALLEY AUTHORITY)	
)	
SEQUOYAH NUCLEAR PLANTS)	DOCKET NOS. 50-327
UNITS 1 & 2)	AND 50-328
)	
WATTS BAR NUCLEAR PLANT)	DOCKET NO. 50-390
UNIT 1)	(COMBINED)

JEANNINE HONICKER'S AMENDED PETITION TO INTERVENE IN
THE HEARING FOR A LICENSE AMENDMENT FOR TVA
TO PRODUCE TRITIUM AT SEQUOYAH AND WATTS BAR

RE: DEC. 17, 2001 FEDERAL REGISTER VOL 66, NUMBER 242,
PAGES 65000-65010

On January 14, 2002 I entered a petition to
intervene in a hearing in the matter of the Tennessee
Valley Authority's (TVA's) request for a license
ammendment to cogenerate tritium, radioactive hydrogen to
be used in the US arsenal of nuclear weapons, along with
the commercial production of nuclear generated electricity.

On February. 7, 2002 the Atomic Safety and
Licensing Board issued a memorandum and order
giving the Blue Ridge Environmental Defense League (BREDL),
We The People (WTP), and me the opportunity to amend our
petitions to intervene.

I hereby take the opportunity so granted, and

request that my original petition be amended to include the following information:

STANDING

Standing is granted to potential intervenors who reside within a 50 mile radius, or who frequent the area. While I do not reside within the 50 mile radius of Watts Bar or Sequoyah, I do frequent the area. Below are six examples:

(1) My son, Clifford, his wife and three children live in Knoxville. My husband and I are retired. We visit them. For instance, we plan to spend my birthday with them in March,

and attend the Joan Baez concert on March 13. Furthermore, when we visit Knoxville, I shop at the outlet malls at Pigeon Forge, and we drive on to Gatlinburg for sightseeing and dining.

(2) I have a long history of attending TVA board meetings.

(3) Since TVA documents pertaining to Watts Bar and Sequoyah are available only at the computers in the TVA libraries in Chattanooga and Knoxville, I expect to be accessing them in either Chattanooga or Knoxville, both of which are within the 50 mile radius of Watts Bar and Sequoyah.

(4) We own rental property in Nashville, Tn.

Although Nashville is also out of the 50 mile radius, the roads between LaGrange and Nashville are not, specifically I-75 between Atlanta and Chattanooga, and I-24 between Chattanooga and Nashville.

(5) To drive between LaGrange and Knoxville also takes us on I-75 between Atlanta and Chattanooga and from there via I-75 to I-40 East to Knoxville.. These roads also bring us within the 50 mile radius of Watts Bar and Sequoyah.

(6) To drive to two other of our childrens' homes takes us over the same route, as both of them live north of Knoxville.

Standing also requires that a potential intervenor show how they would be uniquely affected by the proposed action. Owning property that would be rendered unusable is a financial loss that is sufficient grounds to aquire standing. Is not the life of a child, a beloved daughter in law, and three precious grandchildren more valuable than mere real estate? I can tell you truthfully, I own several pieces of real estate, and not one of them is worth the life of any of my friends or relatives.

The pain and suffering that I would endure should there be an accident or releases from routine operation, that harmed my son, his wife, or any of their three children, is more real than any amount of property, or the

loss thereof. Fear of their harm is mental anguish that can only be eliminated by the denial of the proposed amendment to allow the cogeneration of tritium at Watts Barn and/or Sequoyah.

I am not constantly in Knoxville, but since my husband and I are there some of the time, we would certainly be in harms way, personally, should there be an accident especially one that required evacuation. Since to evacuate toward Nashville or LaGrange would take us even closer to Sequoyah and Watts Bar, we could not escape the radioactive plume. We would be trapped. Even if there was warning, before the plume reached Knoxville, if there was a football game with 100,000 more people on the already congested interstate there would be one hugh traffic jam. We would still be trapped.

Since Chernobyl, an accident that would require evacuation can no longer be considered too remote a possibilty to be planned for. Monitoring plans must be adequate to detect radiation in high and low concentrations at remote as well as sites near the plants. Evacuation plans must be updated to correspond with the increased possibility of the need for evacuation.

When we go through Chattanooga or Knoxville, we are more likely to eat contaminated food or drink contaminated milk if this amendment is granted. Even in LaGrange, that

possibility is not eliminated, because produce, fish, poultry, meat, and milk are shipped far from their origination point. Unless a monitoring system is installed to prevent the processing of food products before they are put on the open market, the only prevention of such contamination is the denial of the proposed amendment.

TVA has historically asked for and received exemptions from the NRC rather than install certain monitors. Has the NRC followed up and insisted that TVA has installed all monitors as required in NRC's regulations, and that all of TVA's monitors operate properly?

After TVA employees almost burned down the Brown's Ferry nuclear power plant while testing for air leaks with a lighted candle, I visited the public document room for that plant in Athens, Al. There I discovered documents that revealed TVA's analysis of higher than expected radiation readings. TVA always blamed the readings on malfunctioning monitors. If the monitors didn't work at Brown's Ferry, do the ones at Watts Bar and Sequoyah perform any better?

I remember that TVA lawyers used the argument that TVA had received an operating license for Brown's Ferry to counter my contention that TVA was not qualified to operate Watts Bar. (1977 Prehearing conference, Watts Bar) Just because TVA had received an operating license did not

mean that they were operated Brown's Ferry safely. Either there was excess radiation being released, or TVA was operating Brown's Ferry with faulty monitors, neither of which was safe operation.

The NRC has the right to grant discretionary intervenor status. If the arguments that I have made still do not satisfy your rules for standing, then I hereby ask you to grant me discretionary intervenor status. Below are examples of how my participation will assist the NRC in not only establishing a record, but of coming to the right decision, a decision to deny TVA's request for a license amendment to allow cogeneration of nuclear weapons material, tritium, at Watts Bar and Sequoyah Nuclear Power Plants.

The Sequoyah Nuclear Plant Unit 1 operating license granted TVA exemptions. For example, the reactor closure head, (the top of this giant pressure cooker) has a crack at weld WO9-10. NRC told TVA they should either repair it or replace it. TVA said that was impractical. TVA said they would calculate the crack growth rate, and inspect the part at each refuelling outage. If the crack grew faster than they calculated, they would then either (a) repair it, or (b) replace it, or (c) recalculate the crack growth rate. At a subsequent TVA Board Meeting I asked if such inspections had been carried out, and if so,

what were the results? I have never gotten an answer to those questions. This hearing should consider the possibility of an accident causing the rupture of the reactor vessel head, since this known flaw exists. TVA should also be held accountable for verifying that they have tested the flaw at each refuelling outage and should furnish the results of those tests, if any tests have in fact been done.

The operating license for Unit one at Sequoyah also disclosed that the reactor vessel will be subject to brittleness fracture at the vessel's beltline, after 9.2 years of operating life. Has this defect been considered in TVA's and NRC's assessment of potential accidents? How would the inclusion of thousands of Tritium Producing Burnable Absorber Rods, each containing its optimum capacity of tritium, affect the results of a brittleness fracture accident of the reactor vessel at its beltline?

Since Easter Sunday, 1974, I have had an interest in TVA's nuclear program. A film "Energy, The Nuclear Alternative" and a book, "Poisoned Power" by Dr. John Gofman and Arthur Tamplin sparked my interest. In his book, Dr. Gofman claimed that 32,500 additional deaths would occur annually if everyone in this country received the allowable dose of radiation that nuclear plants were

allowed to release during routine operation. Half these deaths would be from leukemia, the other half from other forms of cancer.

Leukemia was real to me. Our daughter Linda, had undergone a bonemarrow transplant for acute mylogenous leukemia the previous year. Linda had miraculously survived. The other nine transplant recipiants at the Adult Leukemia Center in Seattle had not been so fortunate. Linda was in the hospital in Seattle for 100 days, but it took her an entire year to recover. Causing other children to suffer and die from leukemia was just too high a price to pay for electricity.

I joined the intervention against what was billed as the world's largest nuclear plant, TVA's Hartsville Nuclear Power Plant. It was the fact that TVA was more concerned with avoiding the costs of installing filters on the turbine and reactor building ventilation systems than in protecting the lives of the people it was chartered to serve that that most disgusted me, and was the contention that was not settled to my satisfaction, even after four years of hearings. I made the closing statement to that effect on the last day of the hearings.

This is the history that led me to question the calculation methods and the assumptions used to estimate the expected doses to the population and to workers

from routine and accidental releases of radiation for the Watts Bar and Sequoyah plants if the requested amendments are granted. In the NRC Staff's answer to my intervention petition concerning this amendment request, they stated that this is an admissable contention.

Before the Hartsville hearings, I visited the public document room for the proposed Hartsville Nuclear Plant, the small public library in Hartsville Tennessee. In volume four of the Environmental Report, Appendix I-2, page 14, I discovered the following:

Using guideline 1.42, the calculation method used originally to calculate the dose to a one year old child drinking milk from a cow that grazed near the Hartsville site, TVA stated that the dose would be 335 mrems per year when the plant was operational. This was radiation from routine emissions.

TVA claimed that guideline 1.42 was too conservative, and initiated a new guideline which they labeled model 2, and recalculated the dose to below the allowable dose of 15 mrems per year, and "saved" \$6 million by avoiding the expected costs of hepa filters for the turbine building and the reactor building ventilation systems, over the forty year expected life of the plant. It was obvious that TVA was not concerned about the public.

At the hearing, TVA lawyers argued that the TVA charter demanded that they produce electricity at the lowest feasible costs. They did not factor in the costs of doctor bills, prescriptions, hospital bills, lost wages etc. Those were costs the public would bear, not TVA. The cost benefit analysis never considered who would pay the costs and who would reap the benefits.

Instead of fullfilling its role as public protector, the NRC, or whatever alphabet soup name it was then called, FURTHER REFINED THE CALCULATION METHOD AND REDUCED ON PAPER THE DOSE THAT WAS ORIGINALLY CALCULATED TO BE 335 MREMS PER YEAR DOWN TO A TINY 1.1 MREM.

Since the Hartsville plant was hailed as the first standardized design, it could have been replicated all over the country with no hepa filters required on the ventilation systems of the turbine or reactor buildings. That was 28 years ago. The people at the NRC may not be the same today as they were 28 years ago, so I doubt that anyone there has questioned the calculation methods. I bring a history of concern and knowledge of past practices to the table that needs to be included in these hearings.

TVA asked NRC for an operation licenses for Watts Bar before construction was completed, decades before it was finally put into operation. In 1977 I was the only person to file a petition for a hearing. My petition was

denied, and there was only a prehearing conference, never a hearing.

S David Freeman, director of the TVA, heard my concerns. He established a team of 37 engineers, calling them the Nuclear Safety Review Team, and charged them with inspecting each of TVA's nuclear plants then under construction. They reported back to him. Construction was halted for many years as a result of problems they unearthed. Unit 2 at Sequoyah was never completed.

One example of how TVA corrected the problems unearthed at Watts Bar is illustrated by how they corrected some of the electrical problems. TVA simply eliminated the National Electric Code as a design criteria. The workers who had voiced their concerns had been promised complete anonymity. After David Freeman left TVA, that promise was broken. Workers who had dared voice complaints were "reduced in force" -- fired. Only the workers who had originally found the problems would be able to verify that the problems were ever eliminated, or if the problems, like the welds, were just painted over rather than fixed.

Much information about the construction of the Watts Bar plant has become available since 1977. The following problems should now be addressed because of the added burden that producing tritium will place on that facility:

(1) Thermo-lag is a combustible material used as electrical insulation by TVA. It was used where fire retardant insulation should have been used. The possibility of a fire is increased by the added hydrogen that will be released with the purposeful inclusion of thousands of Tritium Producing BURNABLE Absorber Rods. Was the consequences of a fire in a plant with thermo-lag electrical insulation considered in the "No Significant Hazards" proposed ruling? Was such an accident previously evaluated?

(2) Hydrogen igniters were installed to purposely burn off hydrogen. The amount that was expected to be released was very much smaller than that which will now be released if this licensing amendment is granted. Instead of a spark, a major explosion should be anticipated. Was this an accident that was previously evaluated?

(3) TVA's upscale fire fighting method is called ice condensers. Ice is supposed to be dropped from the ceiling in the case of an accident. Has the consequences of a failure of the ice condenser system been considered? Has the consequences of their working properly been considered in the event of a fire? Were these considered in the postulated accidents?

(4) An "Egg Shell" containment is the term generally applied to Watts Bar and Sequoyah. Has the possibility of

its failure been considered in the NRC's proposed "No Significant Hazards" findings"

(5) The threat of crashing a fully fuelled jetliner into these reactors should be considered at this hearing because (a) until Sept 11 it was not considered a credible accident. Now that the world has experienced the World Trade Center catastrophe, it should definitely be considered. and (b) Although terrorism may be considered a generic issue, this amendment moves Watts Bar and Sequoyah out of the classification of any other nuclear plants. The added attraction of producing nuclear weapons material elevates these plants to prime targets. They truly become military targets instead of civilian targets. Surely elevating these plants to first choice for hostile nations or terrorist to attack raises this to a site specific issue. The added threat can be eliminated by the denial of the requested license amendments.

(6) The need for tritium has decreased since the project was started. President Bush has negotiated an agreement with Russia for the further joint reduction of the number of nuclear weapons in each nation's stockpile. The tritium that can be reclaimed from those weapons removed from the US stockpile reduces the need for further tritium production. As the US and Russia further reduce our stockpiles to the goal as stated in the non-proliferation

treaty of zero, the need for the production of tritium will have become completely eliminated.

(7) If, however, the US decides to go ahead with the production of tritium, a safer alternative exists rather than producing it at any electricity producing power plant. Use a reactor at a weapons facility, preferably at the Savannah River site, thus eliminating the hazards and the costs of transportation over our highways as well as setting a precedent that once made, can never be rescinded.

(8) In 1954 the Atomic Energy Act was passed prohibiting the production of material for nuclear weapons at any electricity producing power plant. Rhetoric aside, this amendment violates the spirit of that law. Any other nation that chooses to use their electricity producing power plants to cogenerate nuclear weapons material will point to the precedent this license amendment sets. Thus, to grant this license amendment is a threat to National Security, and therefore, it must be denied.

Respectfully submitted,



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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
Tennessee Valley Authority)
)
Sequoyah Nuclear Plant) Docket nos. 50-327 and
Units 1 and 2) 50-328
)
Watts Bar Nuclear Plant) Docket no. 50-390
Unit 1) Consolidated proceedings

CERTIFICATE OF SERVICE

I hereby certify that copies of Jeannine Honicker's amended petition to intervene in the hearing for a license amendment for TVA to produce tritium at Sequoyah and Watts Bar in the above captioned consolidated proceedings have been served on the following by deposit in the United States mail, first class, on this day, Feb. 14, 2002.

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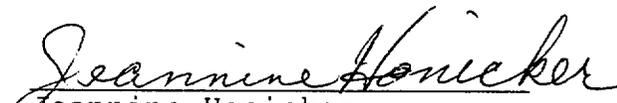
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