

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of)	
)	
TENNESSEE VALLEY AUTHORITY)	Docket No 50-327
)	50-328
Sequoyah Nuclear Plant, Units 1 & 2)	50-390
Watts Bar Nuclear Plant, Unit 1)	

REQUEST OF JEANNINE HONICKER TO REPLY TO RESPONSE OF
TENNESSEE VALLEY AUTHORITY TO MY PROPOSED
CONTENTIONS

INTRODUCTION

On Dec 17, 2001, TVA filed a notice in the Federal Register, Vol. 66, Number 242, Pages 65000-65010 requesting an amendment to the operating license for Watts Bar and Sequoyah Nuclear Power Plants to allow the cogeneration of tritium, radioactive hydrogen for the US. Nuclear Weapons program, along with the commercial generation of electricity.

On January 14, 2002, I filed my first petition requesting a hearing and the right to intervene. On Jan 28, 2002, TVA filed an answer to my request. On Jan 31, 2002, the NRC Staff filed its answer to my request.

On Feb. 2, 2002, I filed a response to NRC Staff's answer to my request for hearing and leave to intervene.

On Feb. 7, 2002, the Atomic Safety and Licensing Board filed a MEMORANDUM AND ORDER, allowing petitioners to amend their original intervention petition by February 21, 2002 and setting a deadline of March 7, 2002. as a deadline for the filing of contention. I met both deadlines. On April 4, 2002, The NRC Staff and the TVA both filed responses to my contentions.

The Licensing Board's "Reply Pleading" on page 6 of the memorandum, states. "A motion for leave to file a reply shall be filed so that it is in the hands of the Licensing Board at least (3) business days of the filing of the response for which leave to reply is sought. Although I received the NRC Staff response on April 4, as it was set by Fed Ex, I only received the TVA hard copy today, Monday, April 8. The e mail copy sent to me by TVA was so voluminous that my Computer Printer became disabled and I must replace it before I can print out this or any other document.

My request to reply is supported by Ms. Ann Harris. I feel sure that the TVA and NRC will oppose it, since they automatically oppose every motion that I make.

To show good cause why I should be permitted to reply will require that I show you the errors that TVA made in their response to my contentions.

For my contention #2, I relied on information furnished by TVA, (Attachment #2 to my contentions.) On page 43 of TVA's response to my contention #2, TVA states: "The bases provided for Petitioner's proposed contention are in error. Attachment 2 to Petitioner's Contentions (submitted in support of this contention) is taken from an attachment to the NRC Meeting Summary which contains factual errors. The attachment describes the tritium lead test assemblies ("LTA") first used at WBN as having been irradiated in the WBN core from June 1997 to March 1998. As TVA explained at this October 2 meeting, however, the LTA TPBARs were in fact irradiated for an entire reactor operating cycle (from approximately September 1997 to Feb. 1999).

This was not my error. I used the information that was published by TVA or NRC. If they knew at the meeting that the LTA TPBAR,s were irradiated from September 1997 to Feb. 1999, why did they publish false information? Any error that I made was based on false information published by either TVA or NRC.

I did not attend the meeting on October 2. I was not notified about it ahead of time, even though I had attended previous meetings on the tritium question.

In my contention #2, I showed my calculation method. TVA and NRC only show their conclusions, with no calculation method cited to show how they arrived at their lower numbers. I maintain that they should be held to even higher standards of proof than petitioners, since it is their actions that are under scrutiny.

Furthermore, in footnote 116 on page 43, TVA states that in 1998, with no TPBARs in place, total tritium releases in liquid effluent were 714 curies, (for Sequoyah.) May I remind you that Sequoyah has two operating reactors, while Watts Bar has only one. Half of 714 is not very different from my estimate of the yearly amount I attribute to Watts Bar. Sequoyah has been operating longer than Watts Bar, which probably accounts for a higher amount, or is it the crack in the reactor lid of Unit 1 at Sequoyah that accounts for the higher numbers?

In my first three page intervention request , Jan. 14, 2002, page 2, last paragraph, I requested the calculation method that TVA used to calculate the doses, and asked that the assumptions be included. The NRC's answer on Jan 31, 2002, page 13 stated "she appears to have stated at least one or more aspects within the scope of the proceedings, P e.g., appropriate exposure pathway and dose calculation assumptions. " TVA has not

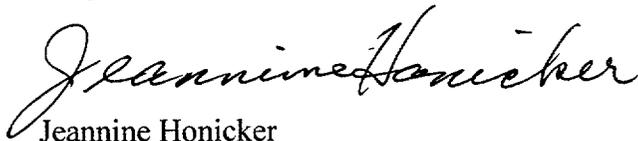
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supplied the models they used or the assumptions they used in the models. Steve Sanford, one of my expert witnesses has attempted to research this question and has found that the information provided the public is insufficient to reconstruct the models. . He accompanied my husband and me to the TVA board meeting on March 26 at Hartsville, TN and reported this to the TVA Board of Directors.

TVA has a history of changing the numbers to suit their purposes. As an intervener at the Hartsville hearing I remember how the calculated dose to a one year old child drinking milk from a cow that grazed near that plant, when it was operational, were reduced on paper from 335 mrems per year of iodine to the thyroid to 1.1, allowing TVA to avoid installing carbon absorbers on the ventilation systems of the turbine buildings and the reactor buildings. I mention this again because it simply proves that TVA uses an eraser to avoid installing the best available technology to actually protect the health and safety of the public. The NRC is as guilty as TVA. They have abdicated their responsibility to the public, and the public has lost confidence in them. Why else would only three petitions have been presented to try to stop this most dangerous project. As one of my friends said, "The public knows it's a waste of time. It just won't do any good." (to try to intervene). You should consider it a compliment that three of us still believed in the system enough to try to be parties to a hearing. To deny our petitions again means that there will be no hearing.

If I am permitted to reply, I will go through the response of TVA more carefully and show other points of disagreement. Time does not permit me to do so today.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jeannine Honicker". The signature is written in black ink and is positioned above the typed name.

Jeannine Honicker
April 8, 2002

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)	Docket Nos. 50-327
TENNESSEE VALLEY AUTHORITY)	50-328
)	50-390
(Sequoyah Nuclear Plant, Units 1 & 2;)	
Watts Bar Nuclear Plant, Unit 1))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "REQUEST OF JEANNINE HONICKER TO REPLY TO RESPONSE OF TENNESSEE VALLEY AUTHORITY TO MY PROPOSED CONTENTIONS" in the captioned proceeding, have been served on the following by deposit in the United States mail, first class, this 8th day of April 2002. Additional e-mail service has been made this same day as shown below.

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Certificate of Service, Page 2

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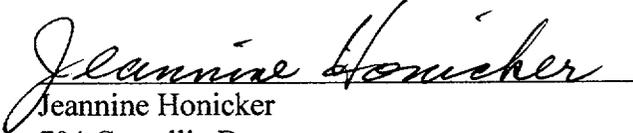
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