

SUGARMAN & ASSOCIATES, PC

ATTORNEYS AT LAW
ROBERT MORRIS BUILDING - 11TH FLOOR
100 NORTH 17TH STREET
PHILADELPHIA, PENNSYLVANIA 19103

ROBERT J. SUGARMAN *
CARL W. EWALD
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HEATHER R. BRINTON

215-864-2500 • FAX: 215-864-2501
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BUCKS COUNTY OFFICE
122 NORTH MAIN STREET
DOYLESTOWN, PA 18901

215-348-8786 • FAX: 215-230-1922

* Also admitted in NY, DC

August 15, 2003

John Kinneman
Branch Chief, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

37-30804-02
03036239

2003 AUG 18 PM 1:34

RECEIVED
REGION I

RE: CFC materials license application

Dear Mr. Kinneman:

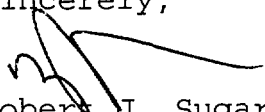
On behalf of the attached list of citizens, we respectfully request that the Staff deny or withhold any decision on a license to be issued to CFC, and in support thereof, make the following points:

1. The public, including us, have not had an opportunity to review the application, due to CFC's confidentiality claim. We understand you are reviewing this claim under the FOIA, and respectfully join in the outstanding FOIA request, and request that the documents be furnished to us.
2. We request an opportunity to review the CFC filings in response to your letter of July 18, 2003. We have not yet be able to locate these filings on the site.
3. CFC's record of inadequate disclosure to the Township, the public and counsel suggests that there are serious underlying problems, associated with the safety and security aspects of the system.
4. All the reasons set forth in our areas of concern to the Board in docket number 03036239.

132825

In combination, these concerns require consideration. We request an opportunity to meet with you to discuss these matters.

Sincerely,



Robert J. Sugarman

cc: Stephen Lewis, Esq., NRC Staff Counsel

CFC Logistics, Inc. license application (docket number 03036239)

Hearing requestors

Tiffany Biagioli
2071 Milford Square Pike
Quakertown, PA 18951
(215) 538-2606

Añita Boyer
2006 Huber Drive
Quakertown, PA 18951
(215) 538-7441

Christina Butcher
1999 Huber Drive
Quakertown, PA 18951
(215) 536-6274

Nancy Comfort
Huber Drive
Quakertown, PA 18951
(215) 804-0163

Cliff Evan
2017 Huber Drive
Quakertown, PA 18951

David Fhl
2067 Huber Drive
Quakertown, PA 18951

Catherine Fletcher
2086 Huber Drive
Quakertown, PA 18951
(215) 529-4749

Andrew Ford
1730 Red Bud Road
Quakertown, PA 18951
(215) 538-7150

Suzi Glowaski
2007 Huber Drive
Quakertown, PA 18951
(215) 538-2525

John Grabowski
2065 Huber Drive
Quakertown, PA 18951
(215) 538-9155

Tom Helt
Kelly Helt
1742 Red Bud Road
Quakertown, PA 18951
(215) 529-9332

Sandra Hinkle
2180 Weiss Road
Quakertown, PA 18951

Jennifer Howlett
2000 Huber Drive
Quakertown, PA 18951
(215) 538-7945

Roseanne Kelsall
2083 Huber Drive
Quakertown, PA 18951
(215) 529-4756

Barbara Lorman
2082 Huber Drive
Quakertown, PA 18951
(215) 529-1306

Charles Moyer
1406 Concord Court
Quakertown, PA 18951
(215) 529-4511

Hetal Peters
2125 Gable Lane
Quakertown, PA 18951

Ken Reynolds
Wentz Road
Quakertown, PA 18951

Philip Stein
Judy Szela
1920 Allentown Road
Quakertown, PA 18951
(215) 529-5562

Robert G. Urich
Jennifer Urich
2013 Huber Drive
Quakertown, PA 18951
(215) 529-1630

Lori Beth Verba-Martin
1860 Fox Lair Drive
Quakertown, PA 18951
(215) 529-6541

Brian Zunt
2066 Huber Drive
Quakertown, PA 18951
(215) 536-0565

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

In matter of :
CFC LOGISTICS, INC. : DOCKET NO. 03036239
materials license application :
:
:

SPECIFICATION OF AREAS OF CONCERN

Pursuant to the Board's Order, the proposed intervenors make the following specification of issues of concern, and submit that they confer standing on proposed intervenors, and are germane to this proceeding:

General Substantiation of Grounds of Concern: Lack of Information:

The refusal to make disclosure together with this history, unique nature of the facility, raise compound issues of concern as to the absence of adequate information.

A. The applicant has withheld information from the public, and has been dishonest about the grounds. The applicant's February affidavit states that the information is being withheld for security reasons only, and does not identify any trade secret issue. (Copy attached) In contradiction, the applicant, through counsel, represented in a telephone discussion on the record on August 8 and off the record on July 12 that the basis of the

of the withholding included specifically trade secret information.

B. The applicant also misrepresented the nature of the withheld information. On August 12, the applicant repeatedly asserted that the information was not relevant to the issue of standing and germaneness, because it related only to the assembly of components of the fuel rods, whereas the affidavit requesting nondisclosure (Copy attached), refers to much broader issues, which clearly relate to safety and also to security.

C. The applicant has also failed to provide any analysis for the potential safety failures, and their effects, as well as causes; and has failed to provide any analysis of security failures and their causes and effects. In the context of an untried facility, this lack of information.

D. The Board's order directs itself toward germaneness and standing, requires evidence to be provided to satisfy the Commission and the record, under both the Nuclear Act and National Environmental Policy Act, that adequate safety evaluation has occurred. In the absence of such analysis, concerns cannot be ruled out or confined. In the absence of necessary information, such analyses cannot be done, or corroborated or tested.

Effects: Risk of health effects, including chronic and disaster, will cause health effects, loss of natural resources, and adverse

Operational: That the facility represents concern because it presents a serious risk in that it is not be adequately protected against accidents and terrorism due to inadequate design, inadequate operational plans, and inherent danger.

1. Air Dispersion: No plans have or can be shown to assure against air dispersion because of low level plans and construction.

1.1 Cracking of vessel containing cobalt-60

1.11 Event: The vessel containing the cobalt-60 which require continual water cooling may crack from loss of coolant.

1.12 Impact: Radiation would be emitted into the air which would harm intervenors, some of whom live 13 miles from the site and most of whom live within a mile of the facility.

1.13 Substantiation: An expert who examined the license application found that the loss of coolant or the failure of pumps to remove heat from the water may cause the water to boil, pressurization of the vessel, causing the cobalt-60 rods to overheat and compromising the vessel. Radiation would then be emitted into the air.

1.14 Source: Reply July 17, 2003 p. 14; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D.

1.2 Neighbors Air Circulation

1.21 Event: Air circulation around the vessel containing the cobalt-60 could emit radiation into the air.

1.22 Impact: Radiation emitted into the air would harm proposed intervenors, most of whom live within a mile of the facility.

1.23 Substantiation: An expert who examined the license application found air circulation around the vessel is a potential source of environmental contamination. Additionally, no dispersion analysis has been provided to show such emissions can be confined to the facility site. The application has no discussion of the radiation criteria for shutting down the facility; what radiation concentrations in air, resins and HEPA filters will cause applicant to investigate radiation leakage and shut down the facility

1.24 Source: Reply July 17, 2003 p. 14; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D.

1.3 Radioactive Waste

1.31 Event: Storage of radioactive waste at the facility may emit radiation into the air.

1.32 Impact: Emission of radiation into the air would harm proposed intervenors, most of whom live within a mile of the facility.

1.33 Substantiation: An expert who examined the license

application found the storage of radioactive waste in the form of resins collected from water chemistry controls is a potential source of environmental contamination. Additionally, no dispersion analysis has been provided to show such emissions can be confined to the facility site.

1.34 Source: Reply July 17, 2003 p. 14; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D.

1.4 Rods

1.41 Event: Mishandling of cobalt-60 rods could emit radiation into the air.

1.42 Impact: Emission of radiation into the air would harm proposed intervenors, most of whom live within a mile of the facility.

1.43 Substantiation: An expert who examined the license application found the mishandling of cobalt-60 rods during transportation, loading and discharge, cracking and leaks from the rods are potential sources of environmental contamination. No dispersion analysis has been provided to show such emissions can be confined to the facility site. Further, the license application does not describe the procedures for loading and unloading sources, including emergency procedures for accidents in loading and unloading sources. Therefore, proposed intervenors and experts are unable to assess these procedures for

important safety information.

1.44 Source: See Reply July 17, 2003 p. 14; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D; CFC license application February 25, 2003.

1.5 Loss of Electricity

1.51 Event: A loss of electricity could compromise cobalt-60 and emit radiation into the air.

1.52 Impact: Radiation could be emitted into the air causing harm to proposed intervenors most of whom live less than one mile from the facility.

1.53 Substantiation: In the event of a loss of power while a bell containing cobalt-60 is underwater, the source could become water-logged, distribute itself within the pool, thereby clogging the filters. In changing the clogged filters, cobalt-60 may be released into the air. The license application does not provide emergency procedures for this potential accident.

1.54 Source: See CFC license application February 25, 2003.

1.6 Damaged Air Line

1.61 Event: A damaged air line could compromise cobalt-60 and emit radiation into the air.

1.62 Impact: Radiation could be emitted into the air causing harm to proposed intervenors most of whom live less than one mile from the facility.

1.63 Substantiation: The license application contains no emergency procedures for accidents involving a break in the compressed air line. This break would allow water to enter the bell holding the cobalt-60 underwater, would degrade the source in the pool, clog the filters. In changing the clogged filters, cobalt-60 would be emitted into the air.

1.64 Source: See CFC license application February 25, 2003.

1.7 Ozone Dispersion

1.71 Event: Irradiation facilities generate high levels of ozone that is particularly harmful because of its close proximity to the ground.

1.72 Impact: Proposed intervenors live in close proximity to the facility and would be harmed by the dangerous exposure to ozone.

1.73 Substantiation: An expert has noted that ozone harms the community surrounding an irradiation facility because it is a very toxic atmospheric pollutant when it is close to ground level instead of high in the stratosphere.

1.74 Source: See Hearing Request June 23, 2003 p. 2; "Food Irradiation Threatens Public Health" attached to Hearing Request June 23, 2003.

1.8 Installation and Assembly:

1.81 Event: Plans for assembly and installation are

new, untried on a large scale, and have not been made available for safety review.

1.82 Impact: Proposed intervenors live in close proximity to the facility and would be harmed by air or water dispersion that may occur.

1.83 Substantiation: Applicant's claim of trade secret.

1.84 Source: See Reply July 17, 2003 p. 14.

2. Neighbors Security

2.1 Irradiation facility is inadequately regulated and secured; no security data is available. Security issues are serious with generalized effect.

2.11 Event: Because irradiation facilities are relatively small, they are often unregulated and lack adequate security.

2.12 Impact: Irradiation facility are vulnerable to national security breaches and terrorism (for example, criminal background checks on employees are not required). Thefts may "go bad," causing release of cobalt-60, thereby threatening the proposed intervenors who live in close proximity to the facility.

2.13 Substantiation: Experts warn that due to inadequate security at irradiation facilities, these facilities are vulnerable to sabotage, particularly because terrorists may attempt to steal cobalt pellets from irradiation facilities that can be mixed with conventional explosives to produce "dirty

bombs." Also see CFC and Gray*Star's submissions regarding such a threat.

2.14 Source: See Hearing Request June 23, 2003 p. 2; "Food Irradiation Threatens Public Health" and "Preventing Pathogenic Food Poisoning" attached to Hearing Request June 23, 2003.

2.2 Security Plan Is Not Adequate and Cannot be Made Adequate.

2.21 Event: CFC has not made any security measures and procedures publically available.

2.22 Impact: Proposed intervenors and their experts are unable to assess the facility's security provisions.

2.23 Substantiation: CFC has omitted all security provisions from its license application that is publically available on the NRC website.

2.24 Source: See Hearing Request June 23, 2003 p. 2; See Reply July 17, 2003 p. 16; CFC license application February 25, 2003.

3. Exposure To Irradiation Facility Workers (Air and Water)

3.1 Event: Irradiation facility workers may be exposed to dangerous levels of radiation.

3.2 Impact: Exposed workers could spread radioactivity to locations outside the irradiation facility thereby harming proposed intervenors.

3.3 Substantiation: For example, in Decatur, Georgia in June 1988, two workers who were exposed to cesium-137 left the facility and spread radioactivity to their cars and homes.

3.4 Source: See Hearing Request June 23, 2003 p. 2; "The Dangers of Irradiation Facilities: A Legacy of Deaths, Injuries, Accidents and Cover-ups" attached to Hearing Request June 23, 2003.

4. Neighbors Water Dispersion

4.1 Event: Public water system may be accidentally, recklessly, or intentionally contaminated with cobalt-60 due to leakage into groundwater.

4.2 Impact: Proposed intervenors' health and safety would be jeopardized by contamination of drinking water, particularly because the water table is close to the surface in Milford Township.

4.3 Substantiation: For example, in Dover, New Jersey in June 1986, workers were instructed to pour 600 gallons of water contaminated with cobalt-60 down a shower drain that emptied into the public water system. In Parsippany, New Jersey in June 1974, radioactive water from a cobalt-60 storage pool was flushed down the toilet into the public sewer system.

4.4 Source: See Hearing Request June 23, 2003 p. 2; "The Dangers of Irradiation Facilities: A Legacy of Deaths, Injuries, Accidents and Cover-ups" attached to Hearing Request June 23,

2003.

5. Transportation of Hazardous Radioactive Material (Air, Water and Ground)

5.1 Accident

5.11 Event: The irradiation facility must be regularly replenished with cobalt-60, thereby increasing transportation hazards (locally and nationally).

5.12 Impact: An accident involving the transport of cobalt-60 or radioactive waste will expose proposed intervenors to radioactive emissions.

5.13 Substantiation: The license application does not describe the emergency procedures for accidents in loading and unloading sources. Therefore, proposed intervenors and experts are unable to assess these procedures for important safety information.

5.14 Source: See Hearing Request June 23, 2003 p. 2; Reply July 17, 2003 p. 15; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D; CFC license application February 25, 2003.

5.2 Terrorism

5.21 Event: The irradiation facility must be regularly replenished with cobalt-60, thereby increasing transportation hazards (locally and nationally) and the risk of sabotage or terrorism.

5.22 Impact: Experts have found sabotage or a terrorist attack on frequent shipments of radioactive material exposes proposed intervenors to radioactive emissions.

5.23 Substantiation: The license application does not describe the emergency procedures for sabotage in transporting sources. Therefore, proposed intervenors and experts are unable to assess these procedures for important safety information.

5.24 Source: See Hearing Request June 23, 2003 p. 2; "Zapping the Food Supply" p. 4 attached to Hearing Request June 23, 2003.

6. Experimental Design

6.1 Event: The facility is a "first of a kind" (a scale up from an experimental operation of 17,000 curies of cobalt-60 to 1,000,000 curies), and is atypical of other radiation-source irradiators in the United States.

6.2 Impact: An experimental and unprecedented design places proposed intervenors at greater risk of radiation exposure because the design has not been sufficiently tested and is more likely to be faulted.

6.3 Substantiation and source: See Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D.

7. General - Air, Water and Other

7.1 Event: The applicant does not have a cost estimate for decommissioning. 10 CFR 30.35(e) states, "[e]ach decommissioning

funding plan must contain a cost estimate for decommissioning and a description of the method of assuring funds for decommissioning from paragraph (f) of this section, including means for adjusting cost estimates and associated funding levels over the life of the facility." The applicant has offered the minimum \$75,000 financial assurance, but has not come forward with a decommissioning plan.

7.2 Impact: Proposed intervenors may be affected by serious air and water dispersion due to lack of maintenance.

7.3 Substantiation: 10 CFR 30.35(e) and orphan site problems.

7.4 Source: CFC license application February 25, 2003.

Respectfully Submitted,



ROBERT J. SUGARMAN
I.D. NO. 03332
COUNSEL FOR PROPOSED
INTERVENORS

OF COUNSEL:
SUGARMAN & ASSOCIATES
100 N. 17th Street - 11th floor
Philadelphia, PA 19103
(215) 864-2500

Dated: August 14, 2003

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

In matter of :
CFC LOGISTICS, INC. : DOCKET NO. 03036239
materials license application :
:
:

CERTIFICATION OF SERVICE

This is to certify that in this case complete copies of all papers contained in the Specification of Areas of Concern, affidavits and map have been served upon the following persons, by e-mail and overnight mail (where e-mail address is given) or first class mail on August 14, 2003:

Anthony J. Thompson, Esq.
Christopher S. Pugsley, Esq.
Law Offices of Anthony J. Thompson, P.C.
1225 19th Street, N.W.
Second Floor
Washington, DC 20036
ajthompson@athompsonlaw.com

U.S. Nuclear Regulatory Commission
Office of the Secretary
One White Flint North
11555 Rockville Pike
Rockville, MD 20851

John Kinneman
Branch Chief, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Administrative Judge
Charles N. Kelber
Special Assistant
Atomic Safety and Licensing Board Panel
Mail Stop - T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
cnk@nrc.gov

Administrative Judge
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Presiding Officer
Atomic Safety and Licensing Board Panel
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Office of Commission Appellate Adjudication
U.S. Nuclear Regulatory Commission
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James Wood
President
CFC Logistics, Inc.
400 AM Drive
Quakertown, PA 18951

Stephen Lewis, Esq.
Counsel for NRC Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555
shl@nrc.gov



COURTNEY BRYAN

SUGARMAN & ASSOCIATES
100 N. 17th Street, 7th Floor
Philadelphia, PA 19103
(215) 864-2500



Affidavit

L 30804
030-36239
03521
(37-30804-02)

I, **James Wood**, being duly sworn, depose and state as follows:

- (1) I am the president of CFC Logistics, Inc. ("Applicant").
- (2) As president of the Applicant, I am authorized to apply for withholding of submitted materials to the US Nuclear Regulatory Commission from public disclosure.
- (3) The Applicant requests that certain information be withheld from the "Application for Material License For CFC Logistics, Inc. Rev. 01".
- (4) The specific information requested to be withheld:

1. Radiation Safety Program, Security Section.

Due to heightened awareness of security issues since September 11, 2001, the Applicant has taken extra measures to supplement existing security for the facility. The Applicant requests that this information be withheld from public disclosure. The public disclosure of this information might be used to endanger the facility and personnel. A person or persons intent on doing harm might be able to subvert the detailed security measures if they are provided this detailed information. We believe that this in accordance with the objectives of 10CFR2.790(1)(i)

2. Non-Routine Operations.
Procedures (in their entirety):
 - GI-201 Source Repositioning
 - GI-202 Source Loading
 - GI-203 Source Unloading

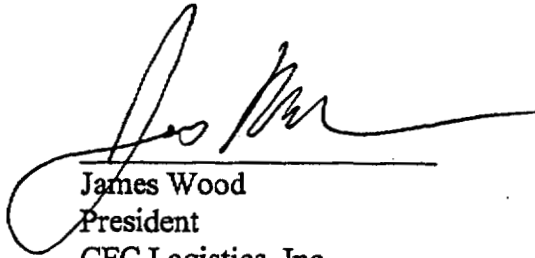
Due to heightened awareness of security issues since September 11, 2001, the Applicant requests these procedures to be withheld from public disclosure. These specific procedures detail the handling of the sealed source material. Should, for any reason, an unauthorized person(s) try to damage, expose or remove a sealed source, the public, facility and personnel might be endangered. Providing this material to such unauthorized person(s) might facilitate intent to do harm because these procedures would give them specific instruction of how to handle and remove source material. We believe that this in accordance with the objectives of 10CFR2.790(1)(i)

- (5) A copy of the Application will be provided for public disclosure which has the above information withheld. The specific pages withheld will be indicated by replacement page indicating "This page has been withheld from public disclosure".

James Wood, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information and belief.

Executed at Hatfield Township, Pennsylvania, this 18TH day of February, 2003.


James Wood
President
CFC Logistics, Inc.

Subscribed and sworn before me this 18TH day of FEBRUARY, 2003


Notary Public, Commonwealth of Pennsylvania

My Commission Expires

Notarial Seal Philip E. Keeler, Notary Public Hatfield Twp., Montgomery County My Commission Expires Aug. 10, 2004 Member, Pennsylvania Association of Notaries

Location of Residents Signing Affidavits



Red Triangles are Requestors.

2 Miles



DOQQ Originator:
U.S. Geologic Survey; Pennsylvania Bureau of Topographic and Geologic Survey
Flight date: April, 1999

Location map prepared by: William Heasom, P.E. (215)-536-3944
2505 Tirjan Ave.; Quakertown, PA 18951

Seq. No	Address	Road	First Name	Last Name	Phone	GPS Point No	Note	North	West	Distance to CFC
	No.				(215) Prefix			(degrees)(NAD 83)	(degrees)(NAD 83)	(feet)
				CFC log.		194	500' N of plant	40.44175	75.42581	
				CFC log.		195	500' N of NE cor plant	40.44181	75.42415	
1	1730	Red Bud Road	Andrew	Ford	538-7150	196	S. Side of street (opposite)	40.43649	75.42986	1800
2	1742	Red Bud Road	Tom & Kelly	Helt	529-9332	197	? (SW side) opposite	40.43646	75.42926	1700
3	2086	Huber Drive	Catherine	Fletcher	529-4749	198	going SW to right	40.43719	75.43602	3300
4	2083	Huber Drive	Roseanne	Kelsall	529-4756	199	going SW to left	40.43702	75.43660	3400
5	2082	Huber Drive	Barbara	Lorman	529-1306	200	going SW to right	40.43699	75.43650	3400
6	2067	Huber Drive	David	Fhl		201	going SW to left	40.43637	75.43776	3900
7	2065	Huber Drive	John	Grabowski	538-9155	202	going SW to left	40.43632	75.43782	3900
8	2066	Huber Drive	Brian	Zerbert	536-0565	202	going SW to right	40.43632	75.43782	3900
9	2017	Huber Drive	Cliff	Evan		203	going NE to left	40.43535	75.43629	3700
10	2013	Huber Drive	Robert & Jennifer	Urich	529-1630	204	going NE 50' left	40.43560	75.43601	3500
11	2007	Huber Drive	Suzi	Glowaski	538-2525	205	going NE 60' left	40.43597	75.43561	3400
12	2006	Huber Drive	Anita	Boyer	538-7441	206	going NE 30' right	40.43607	75.43551	3300
13	2000	Huber Drive	Jennifer	Howlett	538-7945	207	going NE 30' right	40.43643	75.43513	3100
14	1999	Huber Drive	Christina	Butcher	536-6274	208	going NE 50' left	40.43662	75.43502	3100
15	2125	Gable Lane	Hetal	Peters		209	going NW to right	40.43515	75.43715	3800
16	1875	Wentz Road	Ken	Reynolds		210	Headed NW 30' left	40.44579	75.41997	2400
17	2180	Weiss Road	Sandra	Hinkle		211	Headed S 100' right	40.43957	75.41499	2700
18	2071	Milford Square Pike	Tiffany	Biagioli	538-2606	212	going E 100' on right	40.43590	75.40626	5400
19	1920	Allentown Road	Phil & Judy	Stein & Szela	529-5562	213	NW of bridge over unami	40.42866	75.39723	8600
20	1860	Fox Lair Drive	Lori Beth	Verba-Martin	529-6541	214	Heading N 50' right	40.42438	75.37088	16100
21	1406	Concord Court	Charles	Moyer	529-4511	215	Heading W 50' right	40.42032	75.37293	16100
22		Huber Drive	Nancy	Comfort	804-0163					

Procedure Used for Preparing Location Map and "Crow Fly" Distances from Affidavit Signatories to CFC Facility

Executive Summary:

I was furnished a list of addresses for location (in relation to the CFC facility near the PA Turnpike). I used a procedure that I have used for similar reconnaissance or feasibility surveys. Using a Garmin GPS 12 XL device, I recorded a GPS coordinate at points opposite the CFC facility (from the public access road) and at points in the road in front of each residential location. I made a note of distance from my observation point to the residential building associated with the address if that was possible to determine from the road.

I downloaded (or updated my) computer files and associated metadata for the Milford Township and Quakertown USGS Quadrangles from the PASDA web site. PASDA (<http://www.pasda.psu.edu/about/index.shtml>) is described as follows:

The Pennsylvania Spatial Data Access system (PASDA) is Pennsylvania's official geospatial information clearinghouse and the Commonwealth's node on the National Spatial Data Infrastructure (NSDI). The PASDA clearinghouse provides for the widespread sharing of geospatial data, eliminates the creation of redundant data sets, and serves as a resource for locating data throughout the Commonwealth through its data storage, interactive mapping/webgis applications, and metadata/documentation efforts.

I used the GIS software, ArcView GIS v. 3.2 (a widely used tool compatible with the PASDA data and with my GPS observations), to show the locations of the CFC facility, the roads and streams of Bucks County, and the individual residences of the signatories on a composite map. Using the distance measuring tool in the ArcView software, I compiled a list of distances to a point estimated to be centrally located within the CFC facility site. A visual inspection of the fit of the observed GPS locations with structures visible in the aerial photographs was made by way of confirmation. The fit of the roads and streams with the photograph also serves to confirm. Finally, some of the points were plotted on a USGS Quadrangle and the distances were measure with a scale to further verify the work.

Notice that many of the residences plotted as well as the local streets that serve them did not exist in 1999. That is the date of the most recent data available from PASDA.

William Heasom, P.E.
August 11, 2003

AFFIDAVIT


Barbara Lorman, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2082 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 11 day of August, 2003.


Barbara Lorman
Barbara Lorman

AFFIDAVIT

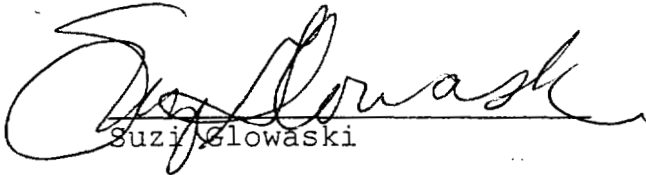
Suzi Glowaski, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2007 Huber Drive, Quakertown, PA 18951.

2. I live 1 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.


Suzi Glowaski

AFFIDAVIT

Suzi Glowaski, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2007 Huber Drive, Quakertown, PA 18951.
2. I live 1 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.


Suzi Glowaski

AFFIDAVIT

Kelly Helt, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1742 Red Bud Road, Quakertown, PA 18951.

2. I live 1/3 of a mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 11 day of aug, 2003.

Kelly A Helt
Kelly Helt

AFFIDAVIT

Tom Helt, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1742 Red Bud Road, Quakertown, PA 18951.

2. I live 1/3 of a mile as the crow flies from the CFC
proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties
for unsworn perjury.

Executed this 11 day of Aug, 2003.

Thomas Helt
Tom Helt

AFFIDAVIT

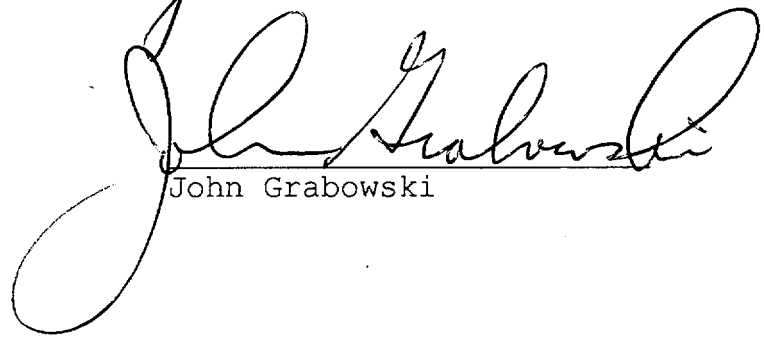
John Grabowski, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2065 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 11 day of August, 2003.


John Grabowski

AFFIDAVIT

Judy Szela, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1920 Allentown Road, Quakertown, PA 18951.
2. I live 1 1/2 mi as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of Aug, 2003.



Judy Szela


AFFIDAVIT

Philip Stein, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1920 Allentown Road, Quakertown, PA 18951.
2. I live 1 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 11 day of August, 2003.


Philip Stein

AFFIDAVIT

Tiffany Biagioli, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2071 Milford Square Pike, Quakertown, PA 18951.

2. I live 1 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.

Tiffany Biagioli
Tiffany Biagioli

AFFIDAVIT

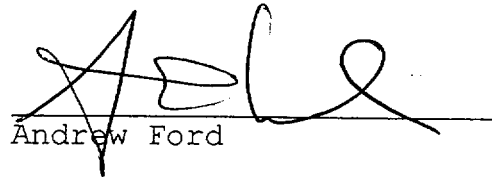
Andrew Ford, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at ^{1730 Red Bud Rd.} ~~2071 Milford Square Pike~~, Quakertown, PA 18951.

2. I live 1/3 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10th day of August, 2003.


Andrew Ford

AFFIDAVIT

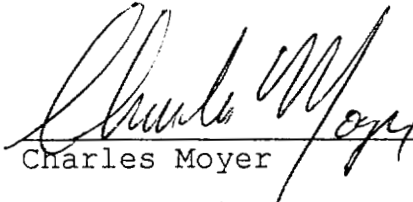
Charles Moyer, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1406 Concord Court, Quakertown, PA 18951.

2. I live 3 miles as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10th day of August, 2003.


Charles Moyer

AFFIDAVIT

Ken Reynolds, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1875 Wentz Road, Quakertown, PA 18951.

2. I live 1/4 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10th day of August, 2003.


Ken Reynolds

AFFIDAVIT

Catherine Fletcher, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2086 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 9th day of Aug., 2003.

Catherine Fletcher
Catherine Fletcher

AFFIDAVIT

Christina Butcher, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1999 Huber Drive, Quakertown, PA 18951.

2. I live 3/2 mi as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 8 day of July 2003.

Christina Butcher
Christina Butcher

AFFIDAVIT

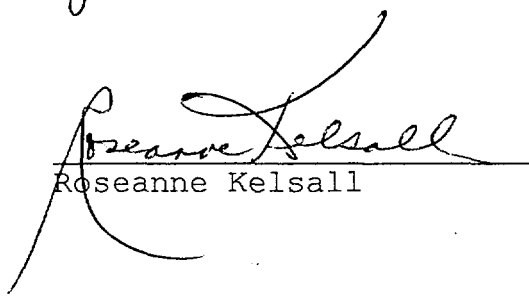
Roseanne Kelsall, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2083 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 9th day of August, 2003.



Roseanne Kelsall

AFFIDAVIT

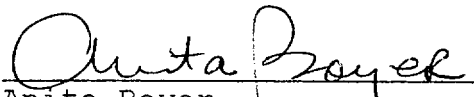
Anita Boyer, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2006 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.


Anita Boyer

AFFIDAVIT

Nancy Comfort, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2076 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile? as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 18 day of August, 2003.

Nancy Comfort
Nancy Comfort

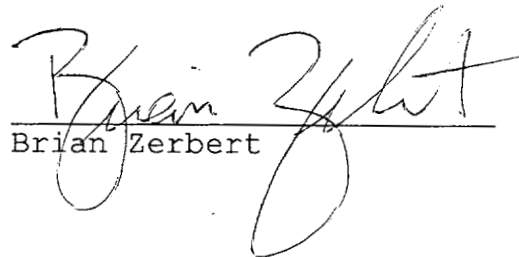
AFFIDAVIT

Brian Zerbert, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2066 Hubert Drive, Quakertown, PA 18951.
2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.



Brian Zerbert

AFFIDAVIT

Jennifer Howlett, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2000 Huber Drive, Quakertown, PA 18951.
2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10th day of August, 2003.


Jennifer Howlett

AFFIDAVIT

Robert G. Urich, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2013 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mi as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10th day of August, 2003.


Robert G. Urich
urich

AFFIDAVIT

Jennifer Urich, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2013 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.


Jennifer Urich Urich