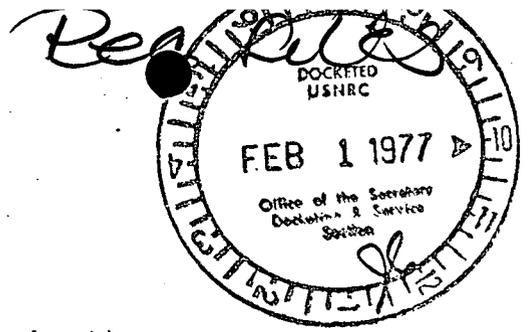


SECRET NUMBER

REG. & MAIL EX. 50-390,391

50-390,391

1-26-77



Affidavit and Petition to Intervene in the Proceedings of the Watts Bar Nuclear Plant.

I, Jeannine Honicker, 362 Binkley Drive, Nashville, Tennessee, 37211, am a customer of Nashville Electric Service, who buys its power from TVA, am a taxpayer in the State of Tennessee, and am the mother of a student attending the University of Tennessee at Knoxville.

As a customer of NES., any action which TVA takes that can cause an increase in rates affects me. Any action which TVA takes that adds costs to the State of Tennessee can necessitate the increase in taxes, which affects me. As the mother of a student at UTK, I have a right to participate in any action which can endanger him.

I therefore petition that I be admitted as an intervenor in the hearings and that TVA be denied an operating liscence for the Watts Bar Nuclear Plant for the following reasons:

(1) TVA has not adequately considered the advantages of using decentralized energy sources instead of the Watts Bar Nuclear Plant, specifically,

(a) Solar collectors for heating and hot water heating to be installed immediately on all municipal, federal, and state buildings.

(b) Assistance to home owners to encourage the installation of solar collectors on private residences.

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(2)

(c) Garbage and sludge to be used as fuel sources rather than considered waste to be destroyed.

(d) New building codes requiring R20 insulation instead of R 11 on all new construction.

(e) Energy efficiency, such as using the waste heat from computers to heat buildings.

(f) MHD - which would produce twice the energy from a ton of coal, compared to conventional coal fired generators, without producing sulfur dioxide, and having a valuable by product, fertilizer.

(g) Energy plantations, Growing vegetation specifically as energy sources, a technology available now.

(h) Other renewable sources as technology becomes available.

(2) These alternate energy sources would create new jobs. By not implementing them, TVA is denying the state revenue in the form of taxes which would be paid if they were implemented.

(3) The Breeder, which is highly controversial, would not be needed if TVA developed alternate energy sources. The costs of the Breeder and other research for the nuclear industry should be considered as part of the costs of operation of Watts Bar Plant.

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(4) The Costs of TVA's involvement in exploration for uranium should be included in the costs of operation of Watts Bar Nuclear Plant.

(5) TVA is incompetent to operate a Nuclear Plant, and as such should be denied an operating liscence.

(6) TVA is an unregulatable federal agency.

(7) TVA is substituting a fuel which is in short suply, uranium, for oil and gas, when we ~~have~~ have a supply of coal extimated at hundreds of years.

(8) TVA is substitution a fuel, uranium, which may have to be imported from the very nations that have the U.S. in an energy crisis now, when we have a readily available coal supply.

(9) The cost of Nuclear generated electricity is higher than coal generated electricity.

(10) TVA residential customers are being forced to ~~a~~ subsidize the nuclear industry.

(11) TVA has not considered and added to the costs of the operation of the Watts Bar Nuclear Plant the extra costs to the taxpayers of TN in added services that the state will be obligated to provide as the result of TVA's operation of Watts Bar as a Nuclear Plant.

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(12) The State of TN will be required to have an emergency operation plan for safe drinking water in the event of an accident that releases radioactivity into the source of a public drinking water supply.

(13) The state of TN does not have an emergency operation plan for safe drinking water in the event of an accident that releases radioactivity into the source of a public drinking water supply.

(14) The cost of drawing up such a plan has not been included in TVA's operational costs of Watts Bar.

(15) The cost of implementing such a plan has not been included in TVA's cost benefit analysis.

(16) TVA has not provided the state with such a plan, nor made arrangements for alternate sources of an adequate drinking water supply in the event of a contaminating event. Such an alternate source should be developed for each and every water company that takes its drinking water from a source that could be contaminated. This should be adequately implemented before TVA is allowed to load nuclear fuel, and/or before they are issued an operating permit for Watts Bar.

(17) In addition to TVA's monitoring system, the State of Tn. will incur additional costs because of the necessity of increased radiational monitoring.

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(18) TVA has not considered the cost to the state of increased radiational monitoring.

(19) TVA has not included plans to adequately and timely notify the public of their monitoring results. Monitoring results should be included in daily weather reports just as temperature and rainfall.

(20) TVA should be concerned with the health and safety of the people and should offer monitoring above that specifically required in the guidelines. Such an adequate monitoring system would be one that would prevent the ingestion of milk and vegetables containing more pCi/l of I-131, Cs-137, Ba-140, Sr-89, or Sr-90, than that which would result in more than the allowable dose as established by Guideline 1.42.

(21) TVA has not included the cost ~~of~~ to the state of Tn. for necessary emergency preparedness in case of an accident that would require evacuation of areas surrounding the plant, or perhaps, even the entire state.

(22) TVA has no adequate evacuation plan for Knoxville that would insure that the population and visitors could be evacuated in the event of an accident taking into account that such an accident could occur when the University of Tn. is having a football game in Knoxville.

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(23) TVA has not considered the loss in revenue to the state that would occur should there be a significant accident.

(24) TVA has not considered the cost of the loss of revenue from the Tourist Business at Gatlinburg and the tourist attractions around Chattanooga, either or both of which could be detrimentally affected by a significant accident at Watts Bar.

(25) TVA has not considered the cost to the state of providing alternate transportation routes in the event of an accident involving the transportation of radioactive waste or spent fuel from the Watts Bar Nuclear Plant.

(26) TVA has not adequately considered the condition of the railroad beds and tracks, or the cost of upgrading of the rail lines if they are to transport waste and spent fuel by rail rather than by truck.

(27) The cost to the state of upgrading and/or replacing bridges, either rail or road, over which Nuclear spent fuel and radioactive waste will pass, should be included as an operation cost of the Watts Bar Nuclear Plant.

(28) The operation license of the Watts Bar plants should be denied until the question of reprocessing and disposal of high level waste has been completely resolved.

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(29) TVA does not have an adequate plan for dealing with low level waste, and has not adequately considered the costs.

(30) TVA has not adequately considered the alternate use of the land necessary for the storage of the waste.

(31) TVA has no specific plans for dealing with the spent fuel rods from Watts Bar.

(32) ~~XXX~~ TVA should be denied a permit for the operation of the Watts Bar plant until the generic question of reprocessing is resolved, and thereafter, until TVA has a definite contract with a ~~re~~processor who has proven, by operation for at least three years, an environmentally safe system.

(33) Should reprocessing be denied, TVA should have a hearing on the disposal or storage of spent fuel before an operation license is issued.

(34) TVA should comply with all State and Federal Air Pollution and Water Quality control laws and should neither ask nor be granted a variance on any state or federal clean air or clean water law.

(35) TVA has not adequately considered the synergistic effects of the effluents from the Watts Bar Nuclear Plant.

(36) TVA has not adequately assessed the cost of ~~xxx~~ potential damages that could result from the acid mists that can be

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created by the combination of the vapor plume from the Watts Bar Nuclear Plant cooling towers and the effluents from the Watts Bar Coal fired plant.

(37) TVA has not adequately considered the costs of the possibility that the Watts Bar coal fired plant may have to be shut down prematurely because of the interaction of the vapor plume from the Watts Bar Nuclear Plant and the Watts Bar coal fired plant effluent.

(38) TVA has not adequately provided for the burial or entomement and perpetual care of the Watts Bar Nuclear Plant when its useful life is over in not more than 40 years.

(39) TVA has not included the costs of medical treatment and burial costs to the victims of the increased cancer, leukemia, and other diseases that will be caused by the operation of the Watts Bar Nuclear Plant.

(40) TVA has not considered the loss to the state ^{the loss of} revenue from taxes that will occur because of the loss of productive years of employment by the victims of cancer, leukemia, and other diseases caused by the operation of the Watts Bar Nuclear Plant.

(41) TVA customers are subsidizing foreign countries because TVA is charging the Oak Ridge Diffusion Plant rates lower than those charged to residential customers. The Oak Ridge Gaseous Diffusion Plant enriches uranium which is shipped to foreign countries.

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(42) TVA residential customers are being forced to subsidize the war efforts of foreign countries who can use the enriched uranium furnished them by the Oak Ridge Gaseous Diffusion plant to fashion atomic weapons after it has been fissioned in a Nuclear Power plant.

(43) TVA's increased use of uranium as fuel for Watts Bar Nuclear Plant will cause a need for additional enrichment facilities. Enrichment is highly energy and capital intensive. The Oak Ridge Gaseous Diffusion Plant cost over 3/4 Billion Dollars and uses the power equivalent to the cities of Nashville, Chattanooga, and Knoxville.

(44) Since the Hartsville Nuclear Plant is needed to provide additional power to Oak Ridge, the portion of the needed expansion at oak ridge Gaseous Diffusion Plant that is attributable to the need to provide Watts Bar enriched uranium should be added to the cost-benefit analysis of the Watts Bar plant, along with ^{the cost of} that portion of the Hartsville Plant that is needed to provide the electricity for that portion of the Gaseous Diffusion plant.

(45) TVA has not adequately considered the combined environmental effects of its total nuclear program, and the support facilities that program will necessitate. To consider them separately is inadequate, because the total effects may be greater than the sum of all the parts.

(46) The effect of the operation of the Watts Bar plant on agriculture has been inadequately considered.

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(47) The length of the vapor plume from the cooling towers is only one tenth that listed for the vapor plume from the Hartsville Plant. TVA should reaccess the plume length, and the effects it will have on people, animals, and vegetation in that area.

(48) TVA should reaccess the effects of the increased moisture to people, animals and vegetation in the area, as well as changes in the weather caused by the operation of the Watts Bar Plant.

(49) The hardships ~~xxxxxxxxxx~~ to be imposed on the people of the affected area, and to the taxpayers of Tennessee should be reassessed, and the cost to mitigate these hardships should be included in the cost-benefit analysis.

(50) The operation of the Watts Bar Nuclear Plant can cause changes in the eco-systems , both terrestrial and aquatic. The effects of these changes have not been adequately evaluated.

(51) The costs of mitigating the effects of the changes in the eco-systems has not been included in the cost-benefit analysis.

(52) TVA's top priority should be to protect the health and safety of the people that it is suppose to serve, rather than to produce electricity at the lowest possible costs.

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(53) TVA should be required to install and use the latest available and best available technology to protect the health and safety of the population.

(54) TVA operators and policy makers should be required to be knowledgeable about the risks inherent in the operation of Nuclear Power plants, including the biological risks.

(55) The public should be fully informed about the risks and costs of nuclear power, and its far reaching effects. Since they have to pay those costs, and take those risks, they should have a voice in whether they want to assume the nuclear option, or whether they prefer alternative methods of providing energy.

(56) TVA is misleading the public concerning the problem of waste.

(57) Environmental Impact statements are not readily available to every ratepayer, and should be a standard reference in every library in the state. Costs of providing them should be included in the costs of the operation of the Nuclear Plants.

I am a private citizen, not a lawyer. I wrote a letter to the NRC several days ago and asked for information relevant to the filing of this petition and affidavit. The notice of the proposed licensing action did not give a docket number. I respectfully request that this petition not be denied

because of form, but that the substance and concern of an interested citizen be taken into consideration^{and} that my petition to intervene be granted.

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Respectfully submitted to the Secretary of the Commission,
Nuclear Regulatory Commission, Washington, D. C. 20555,
Attention: Docketing and Service Section, this 26th
Day of January, 1977, ~~ONE~~ Original and 20 copies.

Jeannine W. Honicker

Jeannine W. Honicker

362 Binkley Dr.

Nashville, TN. 37211

STATE OF TENNESSEE
COUNTY OF DAVIDSON

[Signature]

Noterized by:
Comm Exp 5/1/79



Copies also sent to Nuclear Regular Commission
Washington, D. C. 20555
Attention staff in charge of Watts Bar proceeding

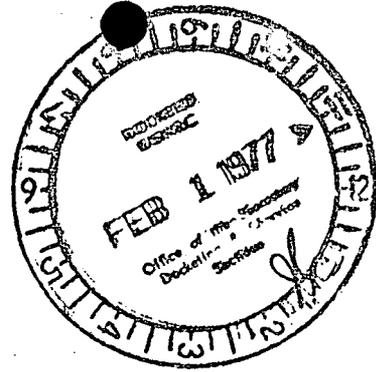
and
T. V. A.
Knoxville, TN.
attention staff in charge of Watts Bar proceeding.

ROBERT B. PYLE
ATTORNEY AT LAW

PROJECT NUMBER

PROC. & UTIL. **50-390,391**

Secretary of the Commission
Nuclear Regulatory Commission
Washington, D.C. 20555
January 26, 1977



Dear Sir:

I have been retained to file a petition on behalf of Safe Forms of Energy for Tennessee, Inc. (SAFE-T), a not for profit corporation organized under the laws of the State of Tennessee and whose membership includes persons who will be affected by the operation of the plant, to intervene in the proceeding to review the application of the Tennessee Valley Authority for operating licences for the Watts Bar Nuclear Plant.

Since I was retained only yesterday, I would like to request an additional fifteen (15) days in which to draw the petition. Please consider this letter my formal application for an extension of time.

Please advise me immediately if this request cannot be granted.

Thank you very much.

Sincerely,

A handwritten signature in cursive script that reads "Robert B. Pyle".

Robert B. Pyle
Attorney at Law
5203 Charlotte Avenue
Nashville, Tennessee 37209

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

TENNESSEE VALLEY AUTHORITY)

(Watts Bar Nuclear Plant,
Units 1 and 2))

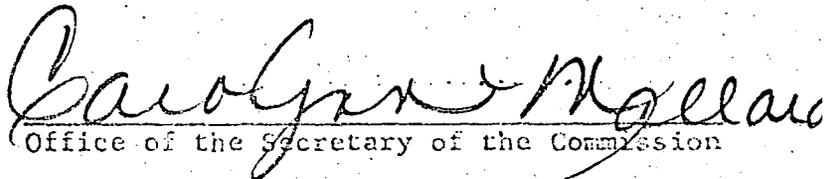
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document(s) upon each person designated on the official service list compiled by the Office of the Secretary of the Commission in this proceeding in accordance with the requirements of Section 2.712 of 10 CFR Part 2 - Rules of Practice, of the Nuclear Regulatory Commission's Rules and Regulations.

Dated, at Washington, D/C. this

1 day of Feb 1977.


Office of the Secretary of the Commission

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
TENNESSEE VALLEY AUTHORITY) Docket No.(s) 50-390
) 50-391
)
(Watts Bar Nuclear Plant,)
)
Units 1 and 2))
)

SERVICE LIST

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