

CITIZENS AGAINST NUCLEAR DANGERS

P.O. Box 377, RD #1, Berwick, Pa., 18603

1/8/79

date: January 8, 1979

Secretary of the Commission
Docketing and Service Section
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

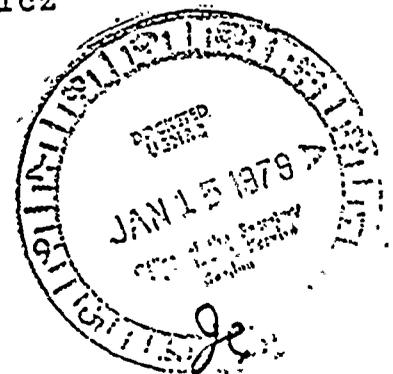
Dear Sir:

As a preliminary prerequisite, and in compliance with government regulations, the Citizens Against Nuclear Dangers in the attached document(s) state for the record the timely reason(s) for intervention in the proceedings before the U.S. Nuclear Regulatory Agency and before the Atomic Safety and Licensing Board in the matter of: Pennsylvania Power and Light Company, and Allegheny Electric Cooperative, Inc. (Applicants) Docket Nos. 50-387 and 50-388; Permits Nos. CFFR-101 and CFFR-102.

Yours truly

Irene Lesanowicz

Mrs. Irene Lesanowicz
Chairperson



THE CITIZENS AGAINST NUCLEAR DANGERS,

Serving as a public interest ad hoc group to inunciate to concerns of many citizens living in relative close proximity to Salem Township,

Believing that the government has thus far failed to adequately protect people from the risk of nuclear dangers, that might occur as a result of the operation of the Applicants' atomic power plant,

Determined to intervene in the interest of public health and safety,

The Citizens Against Nuclear Dangers hereby allege, contend, and aver the following:

Whereas, the major Applicant has publicly admitted in the press on many occasions that defective manufacture and assemblage, etc., of major components of the atomic reactor and its systems for the Salem Township plant have been discovered;

Whereas, in 1978, the congressional General Accounting Office investigations of commercial atomic reactor construction nationwide reveal what amounts to apparent negligence on the part of Nuclear Regulatory Commission officials who improperly conducted the mandated safety inspections of atomic reactors such as the type the Applicants' are constructing at Salem Township;

Whereas, because of the large-scale omissions and discrepancies discovered by the GAO investigations, concerned and responsible citizens have cause to consider the Applicants' safety tests and quality control reports, etc., as tainted;

Therefore, the Nuclear Regulatory Commission should re-examine (or examine for the first time, whichever the case may be) all pertinent inspection records relating to the on-site and off-site manufacture, fabrication and assemblage of all operating systems designed for the Applicants' atomic power plant at Salem Township, with special emphasis on the pressure stress and welding X-ray inspections;

Therefore, careful re-examination of the structural placement of steel and alloy plating shields, steam and water pipes, re-bar and concrete supports, and all other vital components necessary for the proper containment of radioactivity within the designed systems of the reactor facilities at Salem becomes an appropriate course of action for the Nuclear Regulatory Commission in light of the findings of fact by the GAO, and for other compelling reasons, before an operating license can be considered for approval.

THE CITIZENS AGAINST NUCLEAR DANGERS,

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Believing that the government has thus far failed to adequately protect people from the risk of nuclear dangers, that might occur as a result of the operation of the Applicants' atomic power plant,

Determined to intervene in the interest of public health and safety,
The Citizens Against Nuclear Dangers hereby allege, contend,
and aver the following:

Whereas, the United Transportation Union is hesitant to expose train workers to the dangers of industrial radiation while transporting nuclear fuels to the Berwick atomic power plant, and elsewhere;

Whereas, the Federal Railway Administration and the Public Utility Commission presently have only a handful of inspectors to inspect the thousands of miles of rail lines in Pennsylvania;

Whereas, because of, among other things, the lack of Federal regulation, local communities are planning to legislatively ban or restrict the quantities of radioactive fuel shipments sent by train or truck through their communities;

Whereas, the Applicants plan to ship to and from Salem Township via rail an average of twenty shipments (each containing 18 BWR fuel assemblies per cask) an average distance of one thousand miles;

Therefore, because of the badly deteriorating roadbeds and trackage of CONRAIL and the other rail carriers, and the crushing sixty-five ton weight of each fuel cask, the shipment of radioactive cargoes is definitely unsafe at any speed. There should be a moratorium placed on any shipment of atomic fuel to the Applicants' Salem plant until all railway roadbeds and trackage enroute are rebuilt and inspected;

Therefore, the Nuclear Regulatory Commission should also place emphasis on ways and means of dealing with problems that will arise from derailments and collisions especially at: grade crossings, over-passes, under-passes, tunnels, bridges and barge crossings, as well as emergency evacuation plans enroute.