

Rec Fac Branch

CITIZENS AGAINST NUCLEAR DANGERS

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

date: January 8, 1979

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

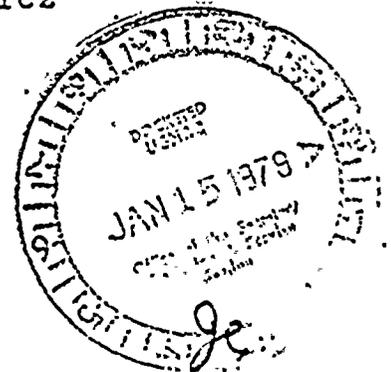
Dear Sir:

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,

Serving as a public interest ad hoc group to enunciate the 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 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.

CITIZENS AGAINST NUCLEAR DANGERS

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

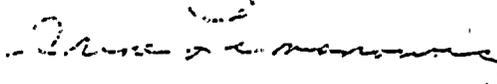
date: January 9, 1979

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


Mrs. Irene Lezanowicz
Chairperson





THE CITIZENS AGAINST NUCLEAR DANGERS,

Serving as a public interest ad hoc group to inculcate the 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, in the course of time and events since the Environmental Impact Statement for the Salem Township atomic power plant was approved by the Nuclear Regulatory Commission, the Applicants have proposed and planned unauthorized and dangerous modifications which violate rules and regulations of the United States government;

Whereas, the most flagrant of these appears to be the proposal to store on the premises at the Salem plant site the radioactive spent fuel rods for several years or more, because there is no nuclear waste disposal site available to receive said spent fuel now or for the foreseeable future.

Whereas, this breach on the part of the Applicants is detrimental to public health and safety, especially to the people living within a fifty mile radius of Salem Township;

Whereas, this endangerment is only one of several violations of the environmental safeguards that were a prerequisite to the granting of the construction permit for the Salem atomic power plant;

Therefore, a moratorium should be issued by the Nuclear Regulatory Commission on the Applicants' operating license until the entire issue over nuclear waste disposal is settled by the government and industry;

Therefore, the interveners also request a complete review by the Nuclear Regulatory Commission of the Environmental Impact Statement because it now appears to be flaunt with discrepancies, miscalculations, suppositions, and omissions, all of which invalidate the document.

THE CITIZENS AGAINST NUCLEAR DANGERS,

Serving as a public interest ad hoc group to inunciate the 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 Applicants plan to transmit electricity generated from the Salem Township atomic power plant over ultra-high voltage (UHV) transmission lines;

Whereas, ultra-high voltage transmission lines produce noise pollution, cause electrical shock from flashovers, create television and radio interference, and also create strong electrostatic and electromagnetic fields that adversely affect living organisms all along the UHV transmission right-of-way and beyond;

Whereas, ultra-high voltage transmission generates dangerous levels of ozone that will cause more injury to vegetation than any other pollutant, and UHV generated ozone can also have harmful effects on human health;

Therefore, the Nuclear Regulatory Commission in conjunction with the Federal Power Commission should direct the Applicants to transmit power from the Salem plant, if and when it becomes operational, at electric current in the 138,000 volt range, up to 230,000 volt range maximum;

Therefore, before approval to operate at Salem, as an alternative, the Applicants could design and build ultra-high voltage transmission lines underground using compressed gas as an insulator, along the designated transmission right-of-ways;

Therefore, underground UHV transmission lines would be environmentally much safer and they would also be protected from wanton vandalism or sabotage that could trigger a big city black-out.

DOCKET NUMBER
50-387,388

Charles Bechhoefer
~~Chairman, Board~~

CITIZENS AGAINST NUCLEAR DANGERS

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

JAN 12 1979

date: January 5, 1979

Mr. Charles Bechhoefer, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

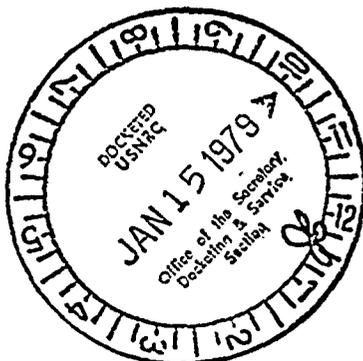
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Yours truly

Irene Lemanowicz

Mrs. Irene Lemanowicz
Chairperson



THE CITIZENS AGAINST NUCLEAR DANGERS

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

Believing that the government has thus far failed to adequately protect these 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 been conducting meteorological monitoring and aquatic surveys as part of a pseudo-environmental surveillance program for the past several years at or near the Salem Township atomic power plant site, as a prerequisite to operating that facility;

Whereas, these scientific projects are viewed by the interveners as a transparent attempt by the Applicants to build their defenses against the inevitable charges that the Applicants will be polluting the environs of Salem Township and the Susquehanna River in the future;

Whereas, the need to scientifically evaluate the effects of low-level radiation on humans is far more important than merely monitoring its effects on wildlife;

Whereas, the Applicants have, unfortunately, thus far failed to conduct radiation studies on people living nearby to determine the disease causing impacts the Salem Township atomic facility would eventually have over a period of thirty years on human populations;

Therefore, as a reasonable and necessary precaution, the Nuclear Regulatory Commission should direct the Applicants, in conjunction with the EPA, and the Pennsylvania Departments of Education and of Health to commence with systematic human physical examinations employing the most advanced medical technology to study the link between low-level radiation and disease, such as cancer, on the human inhabitants cited herein;

Therefore, all pre-school and school age children through the senior high school, residing within a fifty mile radius of the Salem site, should be afforded a medically approved radiation check-up on an annual basis beginning with this school year;

Therefore, mobile monitoring clinics, staffed by state health professionals, should henceforth visit every school within a fifty mile radius of the Applicants plant site to carry out this annual testing program as a vital public health and safety precaution.

THE CITIZENS AGAINST NUCLEAR DANGERS,

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

Believing that the government has thus far failed to adequately protect these 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, rather than trying to come to grips with the monumental problems associated with an emergency evacuation in the event of an atomic accident at the Salem Township site or elsewhere, the atomic industry has procrastinated and resorted to labeling criticism of the inadequate evacuation plans and procedures as "scare tactics,"

Whereas, the pathetic local civil defense system of reporting atomic accidents lacks adequate instruments to track radioactivity much beyond the Salem Township atomic plant site, thereby jeopardizing the health and safety of everyone in a fifty mile radius, but especially the classes of people identified below.

Therefore, the Applicants' emergency evacuation plans cannot be accepted or approved by the Nuclear Regulatory Commission unless and until they are revised to include realistic logistical transportation assistance for the tens of thousands of hospitalized and institutionalized persons in nursing homes and mental treatment facilities, as well as the physically and mentally handicapped within a fifty mile radius of Salem Township;

Therefore, the Federal and state agencies designated to carry out the Interagency Radiological Assistance Plan and the Federal Preparedness Agency of the General Services Administration, et al, should be directed by the Nuclear Regulatory Commission to provide ambulance and other specialized transportation for the classes of citizens mentioned above, in the event of an atomic accident and high level radioactive release from the Salem Township atomic plant;

Therefore, to exclude provisions for the special transportation needs of the infirm, the elderly, and the handicapped, etc., in the Applicants' emergency evacuation plans is inhumane and an unconscionable outrage. It threatens to deprive these residents of life, liberty and property, and also imposes, unconstitutionally, unequal protection of the law and an unfair burden on them as opposed to able-bodied citizens who might be able to escape from an atomic disaster at Salem Township unassisted.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

PENNSYLVANIA POWER AND LIGHT)
COMPANY)

(Susquehanna Steam Electric)
Station, Units 1 and 2))
)
)

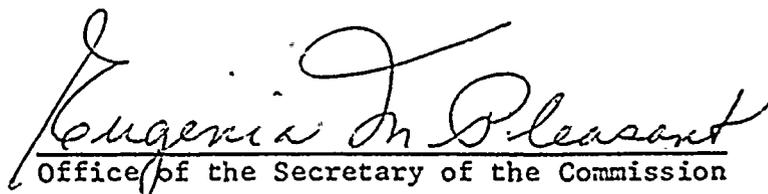
Docket No. (s) 50-387
50-388

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

15th day of Jan 1979.


Eugenia M. Pleasant
Office of the Secretary of the Commission

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

PENNSYLVANIA POWER AND LIGHT)
COMPANY, ET AL.)

(Susquehanna Steam Electric)
Station, Units 1 and 2)

Docket No.(s) 50-387
50-388

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