

Reg Files

4/3/78

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL

In the Matter of

PUBLIC SERVICE ELECTRIC &
GAS COMPANY, et al.

Docket No. 50-272

(Salem Nuclear Generating
Station, Unit No. 1)

REQUEST FOR A FORMAL
ADJUDICATORY HEARING

OR

PETITION FOR LEAVE TO INTERVENE



Pursuant to the notice in the Federal Register Vol 43, No. 27, Wednesday, February 8, 1978, which refers to the request of Public Service Electric and Gas to amend the provisions in the Technical Specifications to permit increase in fuel storage capacity from 264 to 1,170 fuel assemblies in the spent fuel pool of the Salem Nuclear Generating Station Unit No. 1. —

Subsequently the NRC held a curious meeting in Hancock Bridge a few miles from the site of Salem I & II and Hope Creek I & II. A very few copies of the application were distributed there. The evening was one in which much was revealed. The NRC noted that about 50 plants had made application for expansion of spent fuel storage. That the same criteria were used by the NRC to evaluate all these plants. None were denied. The same problems of ultimate solution must have gone evaded at all these other sites. Therefore, it is

with fore-ordained hopelessness that we ammend our petition to intervene. Never^{the}less, hoping that some^{one} within the NRC will see their responsibility to make decisions based upon the ultimate reality, not just the narrowly interpreted rules of practice. We believe our interest is clearly self-evident. If the goals and concerns of an organization with respect to a particular issue will not suffice to confer standing to participate as a party then the NRC Rules of Practice desperately need revision. Very well, leave that aside. Then the trustee signing this petition to intervene; Ruth Fisher, in particular, will be adversely affected by the proceeding. Further, while I do not live in the immediate vicinity of the plant, I have in fact been attracted and incensed by educational advertisements for the "Second Sun" (a ferry boat once docked by the site of Salem I & II - a semi-slick presentation of the glories of nuclear power housed within.) Class trips were urged upon area schools by state-wide ads in a publication of School Board Notes and other magazines. It was an easy "lesson plan." True the boat and signs may have been removed now that the plant is operating off and on, but no warnings have gone up instead.

Even if we did not travel to the site, we (and in particular, Ruth Fisher) may be affected by low-level radiation from the site.

The application of PSE & G states:

There are no potential effects on the environment outside the Fuel Handling Building that would result from the proposed modifications and construction work.

In addition, there are no adverse effects that will occur either on site or off site that can be associated with an increase in the number of fuel assemblies stored in the pool.

An apparent contradiction in the same application PSE & G states:

The radioactivity of the spent fuel pool purification system demineralizes resin increases only by a small factor due to the increase in storage capacity.

Radioactive gases may be released from the spent fuel pool directly into the atmosphere of the Fuel Handling Building. This air is exhausted through particulate and charcoal filters. The major radioactive gas that may be released during spent fuel storage is Ki-85 with a half-life of 10.76 years.

How safe I may be in Cape May County or closer from this radioactivity cannot be validated, for there is no documentation to show how this low-level radiation will affect near-by populations.

Ours then is a particularized interest.

Our contentions were very simple but simply cannot be satisfied, just dismissed! The Sun People contend: (Forthwith they are numbered)

1. Our health may be impaired by low-level radiation. How one's health is so impaired can be explored at the time of hearing. (Sternglass, et al)
2. South Jersey remains ill-prepared to store nuclear waste on this site or anywhere nearby. A superficial scanning of USGS maps of South Jersey indicates all the adjacent area is near sea-level. Clearly storage of a poisonous matter no matter how cleverly encased is more of a hazard when it cannot be embedded with the earth.
3. Sabotage near a metropolitan area. Sabotage anywhere is a known problem for nuclear power. "No facts are set forth to explain how or why the assertion might be true or how risk of sabotage relates particularly to an expanded fuel pool," the NRC states. We cannot explore the minds of saboteurs here, but if groups can hold

as hostage busloads of people, simply imagine how easy and how high the stakes if you hold hostage the populations of Wilmington and Philadelphia. We will dismiss our contention that evacuation plans are confused. Of what concern would evacuation be in such circumstances?

4. Our contention and charge that no clear workable plans for handling, storage or reprocessing of radioactive wastes exists remains.

The application states:

Currently, spent fuel is not being reprocessed on a commercial basis in the United States. In addition, spent fuel storage at an off-site facility is not available at the present time nor in the foreseeable future.

The meeting March 15, 1978 in Hancock Bridge revealed by discussion that the foreseeable future may be hundreds of years or thousands. Therefore we are talking about permanent storage on this site.

We contend that regardless of what previous appeal Boards have held and how many power companies have denied that this is the issue, it is now time for the Licensing Board and the staff to address itself to the issue of long-term storage. The people of South Jersey must know that they are being used to store waste that no one else will take.

It may be a political discussion in the end. We may have to condemn one of our states to be our nuclear repository, but there is another choice. We do not need to continue to generate electrical power with nuclear power. The price is too high.

We hope that you will be reasonable about the issue. Now is the time to hear us through this *introduction*

My Commission Expires Aug. 15, 1978
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Many thanks,
Ruth Fisher

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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GAS COMPANY)
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(Salem Nuclear Generating Station,))
Unit 1))
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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
10th day of April 1978.

Peggy T. Downing
Office of the Secretary of the Commission

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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COMPANY)
)
(Salem Nuclear Generating Station,)
Unit 1))
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