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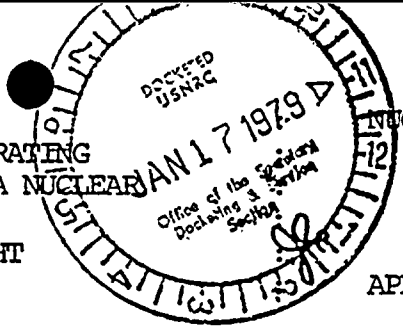


IN THE MATTER OF:
THE APPLICATION FOR AN OPERATING LICENSE FOR THE SUSQUEHANNA NUCLEAR GENERATING STATION BY THE PENNSYLVANIA POWER AND LIGHT CORPORATION

NUCLEAR REGULATORY COMMISSION

1/17/79

APPLICATION NO. 50-387 50-388 of 1978

AMENDED PETITION FOR LEAVE TO INTERVENE

We, the following individuals, as individual persons and as representatives and members of a private, non-profit unincorporated organization known as SUSQUEHANNA ENVIRONMENTAL ADVOCATES, hereinafter referred to as SEA, hereby submit and file our Amended Petition for Leave to Intervene in the above-captioned matter. Our contentions are specified below. It is our position that said contentions meet the requirements of the Nuclear Regulatory Commission for specificity and that the issues contained and represented by said contentions should be raised and fully discussed at the public hearings on the above-captioned matter.

I. Interest of the Petitioners

As stated in our Petition for Leave to Intervene and Request for Hearing, we have a definite substantial interest in this matter. Petitioners live in and around Wilkes-Barre, Luzerne County, Pennsylvania. Petitioners are gainfully employed in various occupations. Petitioners travel to and from the Wilkes-Barre area, sometimes traveling in close proximity to the proposed plant. Petitioners use public parks for recreational activities and use other areas for recreational activities, some of which are in close proximity to the proposed plant. Petitioners drink water from reservoirs which is in turn derived from the area water shed some of which is in close proximity to the proposed plant. Petitioners consume food, some of which is grown in areas near the proposed plant. Some of the Petitioners own real property in the Wilkes-Barre area.

Petitioners financial, property and health interest would be affected by the operation of the proposed plant and the certain possible consequences of said operation.

TRANSPORTATION OF RADIOACTIVE MATERIALS

1. Table 3.8-1 of Chapter 3 Volumn 2 of the ER mentions nothing concerning the exact transportation routes to be used in the transportation of radioactive materials. The table above-mentioned and other sections of the report do not mention what safeguards are being implemented and whether the government or private is handling the design and implementation of these safeguards.

The report also does not state whether the public, the utility, or the government is expected to pay the additional costs incurred through the special safeguards and extra transportation necessary because of this unique form of generating energy.

Thus, it is our contention that until these questions are answered the reports by PP & L are inadequate.

NUMBER TWO

The report does not discuss even possible off-site locations for disposal or storage of low-level radioactive waste. Furthermore, the report ignores who will be responsible for maintenance and security of such sites, where such sites will be located, who will monitor such sites for possible environmental contamination and how long such sites must be maintained. Thus, paragraph two of our original petition should be admitted as a contention.

3 The plans of the company are for decommissioning the facility are deficient and inadequate in the following respects: 1) The method to be used is not specified. 2) The statement that the plant will have the same potential for beneficial uses after decommissioning except for land right around the reactor site is incorrect. The property value will be much lower. 3) The cost estimates listed are derived from an industry-sponsored study. This industry-sponsored study is obviously biased and the cost estimates are far below what the actual cost of decommissioning will be. The Board should require the company to state the specific method that will be used for decommissioning based on the current level of technology and the realistic estimate of its cost. 4) The plan states that "an appropriate and continuous surveillance program" will be instituted. There are no specifics offered as to what this program will consist of. 5) Section 5.8.1-3 entitled prompt removal and dismantling, it is in reality not an alternative because it is not feasible to promptly remove and dismantle a nuclear reactor in turn because of the high levels of radiation present. 6) The time necessary to wait for dismantling has not been specified. 7) The statement that it is "generally agreed that the decommissioning of a large nuclear power facility proposed no new occupational or environmental hazards" is erroneous. This would not be agreed to by the workers who have to dismantle the plant. In fact, there are serious radiation hazards. 8) The section of the report states that the industry study was based on a similar reactor. It does not state which reactor or if it was built by the same company, or if it was sold by the same company. This information should be furhished.

Thus, we think that Paragraph 3 of our original petition as amended should be admitted as a contention.

NUMBER FOUR

Neither the ER nor the FSAR discusses the adequacy of the fuel supply over the projected life of the plant. The price of uranium fuel has risen approximately 400% in the last six years. Much of our uranium must be imported. We think that the adequacy of the supply, the source of the supply (company and country), the current price of fuel and the projected price, and the existing contracts for uranium fuel should be disclosed and discussed. Thus, paragraph four of our original petition should be admitted as a contention.

EXPOSURE OF URANIUM MINERS AND THE PUBLIC TO RADIATION-- NUMBERS FIVE AND SIX

Environmental impacts as set forth in table 5.9-1 entitled "Summary of Environmental Considerations for the Uranium Fuel Cycle of the Environmental Report include only the notation "Occupational Exposure (person-rem) 226 from Reprocessing Waste Management". Thus, the environmental report ignores paragraph 5 of our original petition. It is well known that uranium miners are exposed to radiation and do get cancer from said occupational exposure. We want to know the number of such miners, the extent of the exposure and the projected number of cancer and premature deaths to be caused as a result of the mining uranium for use in fabricating the fuel supply for these proposed units.

The mining is definitely part of the fuel cycle. There is a logical and unavoidable connection cause and effect relationship between the operation of the plant and the mining of uranium. Thus, it is our contention that this is a relevant question and should be explored in the hearings.

The statements in the above paragraphs relating to exposure of miners are equally applicable to the exposure of miners and general public from radiation from mill tailings. Thus paragraph 6 of our original petition should also be admitted as a contention.

EXPOSURE OF WORKERS TO RADIATION

7. The environmental report and final safety analysis report are inadequate in that they do not detail the number of cancer and premature deaths to be caused by exposure of maintenance workers to radiation.

The reports by PP & L do state that there will be exposure of workers who are working on Unit 2 of the station while Unit 1 is in operation. The reports are inadequate in that they fail to state why this exposure is necessary at all. We contend that Unit 1 should not begin operation until construction is completed on Unit 2.

NUMBER EIGHT

The report does not elaborate on either the training or the adequacy of safeguards to protect local emergency units which may be required to participate in emergency evacuation procedures or which may be required to deal with on-site situations. The report does not state whether the public or the utility will provide the training in protection and procedure required by local emergency units to coordinate a safe, systematic evacuation. Thus, paragraph eight of our original petition should be admitted as a contention.

NUMBER NINE

The Summary of Environmental Considerations for the Uranium Fuel Cycle of the ER does mention occupational exposure from reprocessing. However, it does not state how many workers are to be affected, the extent of exposure per worker, and the number of cancer and premature deaths to be caused. We think that the environmental report is inadequate and it does not detail the obviously human costs of the operation of the plant. Thus, we think that number 9 in our original petition should be admitted as a contention.

NUMBER TEN

A serious accident at the plant site involving a major release of radiation and the consequences of this are not even discussed in the ER or the FSAR of PP & L. Studies showing that the risk is so small that this does not even need to be discussed are irrelevant. These studies have been in large part discredited and regardless of the extent of the risk the extent of the possible damage demands discussion of this possibility.

We want to know the consequences of such an accident in terms of the health, welfare and employment of people of the Wyoming Valley Area. We want to know who will bear the costs of injuries and damages to health, property and liberty in the event of a major accident which could contaminate the entire Wyoming Valley rendering it unfit for use and causing an indeterminate number of cancer and premature deaths.

Thus, we think that paragraph 10 in our original petition should be admitted as a contention.

ECCS

-- ASSURANCE OF EFFECTIVENESS OF SAFETY SYSTEMS (INCLUDING E.C.C.S.)

In light of recent E.C.C.S. Testing, it is still uncertain as to whether the back-up system can perform satisfactorally under the more dynamic conditions found in the nuclear facility in Berwick.

It should also be stressed that a single testing should not prove the reliability of any system, let alone one so crucial as the E.C.C.S.

SECURITY PLANS -- NUMBERS 13 and 14

According to Pennsylvania Power and Light Documents the Security Plan for the SSES has been submitted as a separate document withheld from public disclosure pursuant to Federal Regulations.

However, it is our contention that we have a right to know and the public has a right to know the following facts concerning the security arrangements:

1. How many people will be hired to work on the security force at the plant?
2. How will said security force be armed?
3. The costs of said security force?
4. Who will bear the costs of said security force--the stockholders or the rate payers?
5. What kind of plans have been made for security clearance of workers to be hired to be part of the security force, how much these investigations and procedures will cost, and who will bear the cost?

ALTERNATIVES TO THE PROPOSED PLANT

NUMBER FIFTEEN

The environmental report filed by the company is totally inadequate in exploring the alternatives. Environmental report simply adopts the alternatives explored in 1972. To assume that the situation has not changed since 1972, is ridiculous.

The current environmental report states that there are basically only two (2) alternatives, the operation of the plant or letting the plant stand unused. This assertion only reflects upon the short-sightedness of the company. There are more than two alternatives. Among them are the use of the serious energy conservation program, to reduce demand for electricity. A serious program would eliminate the need for the plant altogether and would save the consumers obviously a great deal of money. There is also the alternative of utility developing alternating energy sources including solar wind and hydor-power. During the past five years these energy sources have become a much more well-known. However, the technology for their use has been in existence many years before this.

The assumption by the company that electric use will grow from an annual rate of 4.7% from 1975 to 1990 is probably erroneous, absent of serious conservation of energy effort. If there were such an effort, which we contend the company should take the initiative in supporting the electric use growth forecast would be vastly overstated.

We think that whatever portion of this electric use growth forecast is expected to be used for electric space heating should be disregarded by the Board. This is a wasteful and inefficient way to use electricity. Alternative sources could be used.

The 1972 report discusses neither energy conservation or alternative energy sources as alternatives to the proposed plant. Thus, for these reasons alone it is grossly deficient. It also assumes a 70 percent capacity factor for the nuclear plant when the national experience has been that the nuclear plants have had a less than 60 percent capacity factor due to frequent shut-downs and break-downs. It also

assumes much lower price for uranium fuel than is now in existence. Even given these factors, the cost of the nuclear plant is only slightly lower than the cost of coal plants. We think that these alternatives should be re-examined.

Thus, paragraph 15 of our original petition as amended should be admitted as a contention.

CONCLUSION

The issuance of an operating license to the proposed facility may be inimical to the common defense, security, health, safety, welfare, and liberty of the public in the Wilkes-Barre and Wyoming Valley area. The application for said operating license should be subjected to the closest possible scrutiny.

The application should be subjected to such scrutiny, especially in light of the Forward to the Environmental Report written by the Pennsylvania Power and Light in April of 1978. The Forward states as follows:

> "...we as energy providers must continue to be forward thinking and ever-aware of social and environmental considerations which must mesh with plans for energy supplies. In short, we have become, by necessity, more apt planners weighing carefully our options and impacts on spaceship Earth.
>
> "The 19th Century words of Nietzsche have as much meaning today for corporate and social decisions as for individual actions. 'Man shapes his own future, and that, as well as by what he does as by what he fails to do.'
>
> "This environmental report for our Susquehanna Steam Electric Station records the steps we are taking so that we will not fail to serve future generations."

This Forward to the Environmental Report demonstrates incredible ignorance and arrogance on the part of the Pennsylvania Power and Light Company. The company attempts to portray themselves as enlightened social planners and careful stewards and caretakers of the Earth's environment and resources. The reality of the situation is that the Pennsylvania Power and Light Company, along with some other utility companies, nuclear reactor builders, banks and financial institutions, is through the construction of the proposed operation of this plant contributing to cancer among uranium miners, millers, and workers at the plant, serious adverse environmental consequences, and increased rates for the consumer. The plant will be

a disaster for consumers as well as for the environment. There are proven alternatives to nuclear power which are safer, cleaner, and cheaper. It is our contention that we should use these alternatives and that the application for an operating license by the Pennsylvania Power and Light Company for the Susquehanna Steam Electric Station should be denied.

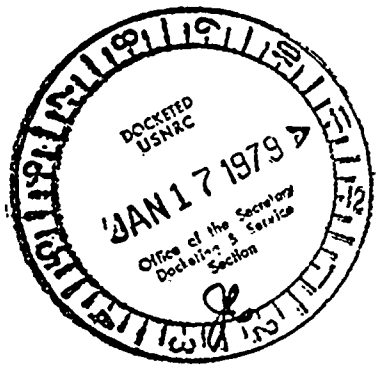
IN THE MATTER OF:	:	NUCLEAR REGULATORY COMMISSION
THE APPLICATION FOR AN OPERATING	:	
LICENSE FOR THE SUSQUEHANNA NUCLEAR	:	
GENERATING STATION BY THE	:	
PENNSYLVANIA POWER AND LIGHT	:	
CORPORATION	:	APPLICATION NO. of 1978

SUPPLEMENTAL PETITION FOR ATTORNEYS FEES,
COSTS OF EXPERT WITNESSES AND
MISCELLANEOUS COSTS

1. As part of our original petition we submitted a supplemental petition requesting that SEA be awarded costs of attorneys fees, expert witnesses, and miscellaneous costs. We further stated the reasons for our supplemental petition.

2. We have received no ruling on this petition at this time. The lack of funds has been a serious obstacle to our preparation of an amended petition. We are people who have full-time jobs and we do not have full-time to devote to this research, unlike the employees of PP & L and their attorneys.

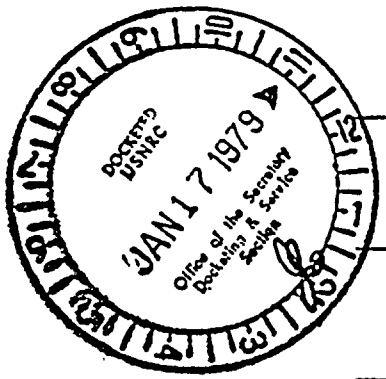
3. We again request that an order be entered directing payment of these costs by the Nuclear Regulatory Commission.



IN THE MATTER OF:	:	NUCLEAR REGULATORY COMMISSION
THE APPLICATION FOR AN OPERATING	:	
LICENSE FOR THE SUSQUEHANNA NUCLEAR	:	
GENERATING STATION BY THE	:	
PENNSYLVANIA POWER AND	:	
LIGHT CORPORATION	:	APPLICATION NO. of 1978

AFFIDAVIT

We, the undersigned, Petitioners in the above-captioned matter, ~~being duly sworn~~, affirm that all statements confirmed in the amended Petition and the Supplemental Petition are true and accurate to the best of our knowledge, information and belief.



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