

Route 2, Box 44

Maple City, Michigan 49664

October 30, 1979

POOR ORIGINAL

Commissioner

NRC

Washington, D. C. 20555



Dear Commissioner;

This is a clarification of my residency and an outline of my contentions.

I am John Patrick O'Neill II and am a permanent resident of Burdickville, Michigan, which is within 50 miles of the Big Rock Nuclear Power Plant. I support myself by working in the Woodcock Restaurant as a cook and manager. The restaurant is owned by my family and is also in Burdickville.

I am a former resident of New York City, but have moved all of our furniture and terminated our lease in that city. My wife Linda lives with me in Burdickville.

Contentions to the License request of Consumers Power  
to expand Spent Fuel Storage capacity  
at the  
Big Rock Nuclear Power Plant

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I Consumers Power cannot guarantee that the spent fuel pool will not be used to store these materials indefinitely, that is on a more or less permanent basis.

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- A. No offsite storage facilities are open now, and it is unlikely that any will become available in the foreseeable future.
1. Reprocessing plants are unprofitable.
  2. There is high citizen resistance to toxic waste storage, which would significantly hinder new sites opening.
  3. There is no proven method known for long term, permanent storage.
- B. Consumers Power should be denied a license for this short term storage facility expansion until it can demonstrate convincingly that there will definitely be safe off site storage by 1990.
1. No evidence of any type shows that off site storage will be available is presented in the licensing request.
  2. The Vermont Yankee and Minnesota plant proceedings revealed that the power companies as well as the NRC knew of no solution to the waste disposal problem.
  3. In the event that the license is granted and no solution to this storage problem is found by 1990, Consumers Power will have been granted a "license" to store radioactive wastes at the Charlevoix facility indefinitely by merit of necessity, not through proper licensing hearings.
  4. The power company is unable to assure the public that the increased number of spent

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fuel rods will ever leave the Charlevoix area.

5. In the event of long term storage, there is no assurance in the application that the materials used in the racks and the integrity of the fuel tank itself will remain undamaged and functional.

a. Stainless steel decomposes over time.

Example at Big Rock found in incident that occurred Oct. 19, 1978 and was reported March 7, 1980

b. The chance of release of radioactivity into the environment increases as the structures decay and as greater lengths of time allow probability of accident.

6. Consumers Power has not demonstrated that it will remain solvent indefinitely and thus remain able to indefinitely maintain the fuel pool, and its increased load of waste.

## II. Release of Radioactivity

A. Routine release of radioactivity may cause health and environmental hazards.

Releases include exposure of 27 one time rads to workers installing new racks, releases in evaporation, and through the walls and floor of the pool, especially the South wall. It must be kept in mind that the expansion allows the routine releases during core offloading to continue, and the safety of these releases is the important issue.

1. Many top scientists and doctors assert with scientific studies that there is no safe level of radiation, no threshold below which a person is safe from carcinogenic and mutagenic effects of radiation.

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Ernest J. Sternglass, Low\*Level Radiation

Dr. Helen Caldicott, Nuclear Madness

B. The environmental hazards associated with small to medium leaks of radioactive water from the pool is not discussed. Such leaks have occurred in Big Rock Plant on August 29, '78, reported Sept. 27, '78, and Sept. 11, '79, reported Oct. 10, '79 and other times, and water assumed to be safe was released on August 19, '78 as reported Nov. 26, '78.

C. The environmental impact of a loss of coolant accident in the pool is not discussed. This is odd, for on p. 2-3 of the licensing request, a loss of pool water up to 200 gpm is considered possible enough to protect against, the the effect of the release of all of this water is not considered.

D. Cataclysmic breach of the containment and loss of coolant is no considered, nor is the impact on the environment mentioned.

1. Possible from impact of a B-52 bomber.
2. Sabotage from a political group or deranged employee.

-Sheldon Novick interviewing David Brower, The Electric War, p 193.

E. Absolutely no consideration is given to the concentrating of fission products in the food-chain as a result of any type of release.

### III. Social and Economic Impact.

A. Any accident resulting from increased storage of fuel rods would endanger my life and the life of my wife, Linda. The possible cause of such accidents elaborated ~~throughout~~ through out this paper.

B. Any accident of significant public fear of accident or imagined danger would endanger our restaurant business, which

depends upon the perception by tourists that the area is a safe place to vacation. This is true for many businesses in the area.

- VI The racks have not been contracted out, nor have actual manufacturing specifications been presented, nor have similar designs been cited, along with their fabricators.
- V Should a terrible accident occur, the power company is limited by the Price-Anderson Act in its liability. Elsewhere in this paper the possible accidents have been discussed, but it is irresponsible to operate anything without proper insurance.
- VI It is not clear in the licensing report if the present pool meets all the present requirements for spent fuel pool. Big Rock is an old plant, and "grandfather" exemptions may have been granted its storage pool which could have effects upon the safety of the expansion.
- VII Solid wastes are generally not being accepted from power plants by disposal sites; hence the fate of solid wastes, including the old broken rack and the sock filters, is in question and not addressed by the licensing request. Are these too to remain at the plant?
- VIII The electricity produced at Big Rock is very small, 72 megawatts, lower than modern power generating facilities by over a factor of 10, and is not needed.
- IX. The licensing procedure should include a review of general plant safety, including all aspects of power generation at Big Rock.

A. Review of general plant safety would provide an indicator of how well the plant structures have withstood almost 20 years of service, and would provide a measure of the reliability of the pool

and related machinery and pipes.

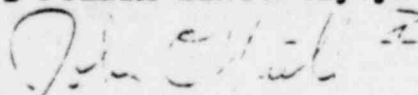
B. Review would provide a good measure of the quality of plant administrative procedures and management, which would have a direct affect on the safe or unsafe operation of the storage facility, and the competence with which modifications can be expected to be made.

C. Granting of the license is the only way the plant can operate past the year 1981 as things stand now, and thus allow an extension of plant activity that would otherwise be halted. Hence, it is a tacit approval of such extended operation, and should include a review of general plant safety.

-The Kemeny Commission will recommend "periodic relicensing of existing atomic plants on the basis of hearings, inspections and performance criteria." Detroit Free Press, Oct. 30, 1979, p. 11A. Such review of the entire plant would be in harmony with this recommendation.

These contentions will be more thoroughly supported in the hearing, and shall provide compelling reasons for the review committee to deny Consumers Power a license amendment.

I remain sincerely yours,

  
John O'Neill

P.S. A list of the people receiving copies of this letter will be forthcoming directly.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
CONSUMERS POWER COMPANY ) Docket No.(s) 50-155  
 )  
(Big Rock Point Nuclear Plant) )  
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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  
7<sup>th</sup> day of Nov 1979.

Peggy T. Downing  
Office of the Secretary of the Commission

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(Big Rock Point Plant) ) (Spent Fuel Expansion)  
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