

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of the
Application of Commonwealth
Edison Co., et. al. , for
Constuction Permits and
Early Site Review, Hearing
and Partial Initial Decision
on Site Suitability

Docket 79-13949

PETITION FOR INTERVENTION AND REQUEST FOR HEARIN'

Pursuant to the notice of hearing in this proceeding, dated May 4, 1979, individuals acting on their own behalf and as members of Citizens Against Nuclear Power, and Citizens Against Nuclear Power, herein file this petition for leave to intervene, and for a hearing, on behalf of themselves individually and Citizens Against Nuclear Power. This petition is filed by persons whose interest may be affected by these proceedings and is authorized by 10 C.F.R. 2.714. The aspects of the subject matter of this proceeding as to which Petitioners seek to intervene are site suitability and issuance of construction permits.

I. The Petitioners

A. Individuals

James Runyon resides, is employed, and owns property in Rock Island, Illinois, about 40 miles south of the proposed site.

Ed Gogel resides and owns property in Chicago, Illinois, about 133 miles east of the proposed site.

B. Citizens Against Nuclear Power

Citizens Against Nuclear Power is an organization concerned with protecting the public and the individuals comprising the organization from the environmental, economical and physical safety hazards of nuclear energy. The individual petitioners above are both members of the Citizens Against Nuclear Power.

II. Interests of Petitioners

The interests involved here are the health, safety and physical and economic well being of each Petitioner.

Effect on Petitioners Interests: Petitioners interests will be directly affected by the results of this proceeding as follows: If the proposed facility is authorized to be constructed at the Carroll County site, each Petitioner and his property will be subjected to the possibility of highly radioactive contamination via malfunction of the facility, the normal production of radioactive waste products by the ordinary operation of the facility, the utilization of the Mississippi River for cooling and other operational purposes, the transportation of said radioactive waste from the

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facility and by other means incidental to the construction and continued operation of the facility. This possibility of radioactive contamination will adversely affect each Petitioner's property interests. Actual radioactive contamination from the facility will adversely affect the health and well being of Petitioner and his property interests.

Each Petitioner further should be allowed to intervene because of his interest is being provided the most economical and least expensive energy source by the applicants herein. Alternative, clean and renewable sources of energy are available and are economically feasible. The nuclear power industry has experienced on a regional and national basis spiraling construction costs and inevitable delays in construction and in rendering a facility operational. The nuclear power industry is economically reliant upon federal and state subsidization, the continuation of such support now being uncertain. If applicants are granted the application sought here, Petitioners interest in being provided the most economical and least expensive energy source will be adversely affected.

Each Petitioner attaches his affidavit to this petition and incorporates it by reference.

For the foregoing reasons, Petitioners respectfully request leave to intervene herein, and requests a hearing on the matters raised by this petition.

James L. Runyon
Signature, Rock Island Area
Representative of Citizens
Against Nuclear Power

1316-2nd Ave. Box 307 Rock Island
Address IL. 612

Edward Logol
Signature

6105 N. Winthrop, Chicago IL 60660
Address

State of Illinois
County of

I, Edward Dogel & James Runyon, Petitioner in the foregoing petition, being duly sworn, state that I have read the foregoing petition, and that the contents thereof are true and correct to the best of my knowledge and belief.

Edward Dogel
(Signature)

Subscribed and sworn to
before me this 1st day
of June, 1979.

Carl Bouzjak
Notary Public

(SEAL)

James Runyon
(Signature)

Subscribed and Sworn to
before me this 4th day
of June, 1979.

William H. Hahn
Notary Public

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the Application of Commonwealth
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Hearing and Partial
Initial Decision on Site
Suitability

Docket 79-13949



A F F I D A V I T

SS
State of Illinois
County of Cook

Ed Gogel, being duly sworn says:

- 1) I am the Petitioner named in the Petition for Intervention and Request for Hearing, to which this Affidavit is attached.
- 2) The specific aspects of the subject matter of the above-captioned proceedings to which I wish to intervene and request a hearing on are site suitability and issuance of construction permits to the applicants in these proceedings.
- 3) The facts pertaining to my interest and the basis for my contentions with regards to each aspect on which I desire to intervene and request a hearing are set forth as follows:

I am a resident of Chicago, Illinois, located approximately 133 miles from the proposed Carroll County site. My physical and economic interests will be adversely affected if the Carroll County site is selected and construction is authorized because of the possibility of highly radioactive contamination. Such contamination will occur via malfunction of the facility, the normal production of radioactive waste products by the ordinary operation of the facility and the transportation of the waste from the facility and by other means incidental to the construction and continued operation of the facility. The possibility of such contamination will adversely affect my property interests. Actual radioactive contamination from the facility will adversely affect the health and well being of myself and my property interests. Such radioactive contamination possesses an extremely high probability of being transmitted by wind, water or other means from the proposed site to Chicago because of the geographical proximity involved.

I further have an interest in purchasing the least expensive and safest source of energy provided by the applicants. Alternative, clean and renewable energy sources are available and are economically feasible. The nuclear power industry has experienced on a regional and national basis, spiraling construction costs and inevitable delays in construction and in rendering a facility operational. The nuclear power industry is economically reliant upon federal and state subsidization. This continued support is uncertain and doubtful in light of recent events at the Three Mile Island facility and the growing public sentiment. If applicants are granted the

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the applications sought here, my interest in purchasing the least expensive and safest source of energy provided by the applicants will be adversely affected.

Edward Fogel

(Signature)

Subscribed and sworn to before
me this *1st* day of *June*, 1979

Frank C. ...
Notary Public

(SEAL)

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A F F I D A V I T

SS
State of Illinois
County of Rock Island



James Runyon, being duly sworn says:

1) I am the Petitioner named in the Petition for Intervention and Request for Hearing, and to which this Affidavit is attached.

2) The specific aspects of the subject matter of the above-captioned proceedings to which I wish to intervene and request a hearing on are site suitability and issuance of construction permits to the applicants in these proceedings.

3) The facts pertaining to my interest and the basis for my contentions with regards to each aspect on which I desire to intervene and request a hearing are set forth as follows:

I am a resident of Rock Island, Illinois, located approximately 40 miles from the proposed Carroll County site. My physical and economic interests will be adversely affected if the Carroll County site is selected and construction is authorized because of the possibility of highly radioactive contamination. Such contamination will occur via malfunction of the facility, the normal production of radioactive waste products by the ordinary operation of the facility and the transportation of the waste from the facility and by other means incidental to the construction and continued operation of the facility. The possibility of such contamination will adversely affect my property interests. Actual radioactive contamination from the facility will adversely affect the health and well being of myself and my property interests. Such radioactive contamination possesses an extremely high likelihood of being transmitted by wind, water or other means from the proposed site to Rock Island because of the geographical proximity involved.

I further have an interest in purchasing the least expensive and safest source of energy provided by the applicants. Alternative, clean and renewable energy sources are available and are economically feasible. The nuclear power industry has experienced on a regional and national basis, spiraling construction costs and inevitable delays in construction

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and in rendering a facility operational. The nuclear power industry is economically reliant upon federal and state subsidization. This continued support is uncertain and doubtful in light of the recent events at the Three Mile Island facility and the growing public sentiment. If applicants are granted the applications sought here, my interest in purchasing the least expensive and safest source of energy provided by the applicants will be adversely affected.

James L. Runyon
(Signature)

Subscribed and sworn to before
me this 11th day of June, 1979.

M. W. [Signature]
Notary Public

(SEAL)

Copies of this Petition have been sent to:

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Commission's Public Document Room
1717 H Street, NW
Washington, D.C. 20555

Executive Legal Director
US NRC
Washington, D.C. 20555

Isham, Lincoln and Beale
Attention: Philip Steptoe, Esquire
One First National Plaza
42nd Floor
Chicago, Illinois 60603



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