



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )

NEW YORK STATE ELECTRIC & GAS )  
CORPORATION and LONG ISLAND )  
LIGHTING COMPANY )

New Haven Nuclear Power Station )  
Units 1 and 2 )

Docket Nos. STN 50-596  
STN 50-597

SPECIFIC CONTENTIONS RESPECTING  
ENVIRONMENTAL / RADIOLOGICAL CONCERNS  
of  
INTERVENORS OSWEGO COUNTY  
FARM BUREAU

Upon information and belief, it is our contention that:

1. Agriculture

The assessment of impact on agriculture is inadequate.

The Applicant and Staff have:

- a. grossly underestimated the value of farmland onsite.
- b. inadequately assessed current and projected agricultural use of the surrounding area. They have failed to provide an accurate assessment of the importance of agriculture and agribusiness to the economics of Oswego County as shown in Section 4.1-8, as amended March 1979, "... the relatively low level of agricultural production in the county."

- c. failed to adequately analyze the impact of dust level increases attributable to plant construction and operation activities, including increases in traffic, on crop growth and yields.
- d. underassessed the impact of noise on dairy herd production. We contend that area dairy farmers will suffer loss of income from construction and operating noise.
- e. underassessed the impact of noise and seismological disturbances from blasting during construction. We contend that such blasting would adversely effect dairy herd production and result in loss of income to area dairy farmers through reduced production and increased veterinary costs.
- f. failed to include the adverse economic impact on farming resulting from increased traffic making some fields inaccessible.
- g. underestimated the impact of increased litter on agriculture. Such litter would effect cattle grazing and cropping of fields resulting in loss of income to area farmers.
- h. failed to assess the resulting decrease in area farmland values. Nor has the compatibility of nuclear power & agriculture been adequately assessed
- i. failed to analyze fungus growth on apple, strawberry, et al., fruit crops resulting from increased levels of moisture and salts in the atmosphere in relation to the cooling towers.

- j. underestimated the impacts of increased rain, snow and ground-level fogging upon agriculture in the plume-path area of the cooling towers. We contend that moisture and salt level increases will have a severe negative effect on cropping the effected areas.
- k. failed to analyze the adverse effect of construction blasting on fruit and vegetable crops.
- l. failed to adequately analyze the impact of the construction and presence of the intake pipe on the properties involved, specifically the fruit orchard. We contend that drainage fields will be disrupted and destroyed, producing trees will be destroyed and the stratification of the soils will be disrupted which will cause irreparable damage to the land for the production of fruit.
- m. underestimated dwelling requirements for construction workers and operators. We contend that additional land will be required for housing to be built for these people which may involve additional agricultural lands for the following reasons:
  - 1. overlap of construction of Nine Mile II and New Haven 1 and 2
  - 2. the size of the project as compared to Nine Mile II
  - 3. the increased cost of commuting due to gasoline price increases

We further contend that in the event of immigration of such persons from outside of the area, farmers will suffer undo harrassment and loss do to complaints against common farming practices.

- n. inadequately assessed the violation of two Agricultural Districts (Mexico and New Haven) whose formation was at the discretion of those agricultural interests they represent for the purpose of preserving farmland by providing discouragements to other land use alternatives within the Districts and includes lands of "Statewide Importance".
- o. failed in the Cost/Benefit Analysis to:
  - 1. include the loss of dairy cattle in the event of an emergency evacuation on short notice (ie 12 hours) such that provision could not be made for milking and feeding cattle. Cows must be milked every 12 hours and fed three times per day (approximately).
  - 2. include increased costs of farm equipment repairs due to increased litter.
  - 3. include a cost/time analysis for increased time involved in transportation of crops due to increase

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4. include increased costs of labor and fuel for farmers who must work under 765 KV and 345 KV lines.
5. include loss of available employees for agriculture due to competition for said employees by the Applicant with Agriculture.
6. include the loss of agricultural products - cattle, produce, et al., due to theft.
7. include the loss of cattle from increased stress due to change in routine.

p. failed in Transmission Analysis to:

1. adequately evaluate decreased breeding capacity of cattle under high voltage transmission lines.
2. access compaction of soils during construction and maintenance of 765 KV and 345 KV lines.
3. analyze increased costs to farmers who must ground electric fence under high voltage transmission lines.
4. analyze the compatability of transmission line maintenance and agricultural practices.
6. accurately estimate the loss of agricultural lands to the 765 KV and 345 KV lines.



7. adequately assess the unnecessary siting in Oswego County in terms of transmission losses when viable alternatives to the preferred site selected exist closer to the Applicants load center
- q. inadequately assessed the probability of a nuclear accident and consequently is overly optimistic of the negative effect of such on agriculture in regards to:
  1. loss of markets
  2. loss of land use
  3. loss of crops (harvested and unharvested)
  4. loss of domestic farm animals
  5. loss of water use
  6. loss of saleability of land

all or any of which would have a severe economic impact on farmers.

r. Preface. It is our contention that the Applicant and Staff have failed to prove that no existing damage to domestic farm animal health from radiation releases is in evidence in Oswego County from the already operating Nine Mile I and Fitzpatrick Nuclear Stations. Such health evaluations are critical to the economic well-being of agriculture in Oswego County and we therefore submit:

1. Domestic Farm Animal Health Monitoring

The Applicant and Staff have failed to out-

line a domestic farm animal surveillance program to monitor the effects of radiation on the health (including genetic effects) of these animals in the surrounding area and should be required to do so.

s. Milk Monitoring

Preface. Timely detection and assessment of any contamination is a vital process which milk producers and distributors deal with daily. Radiation is no less serious a contaminant than any other milk is tested for every time it leaves the farm, but radiation is a contaminant over which the farmer has no control nor means of detecting. The fluid milk product is consumed in a short period of time after production and therefore expediency in detection and assessment of radiation contamination is critical to the producer, distributor and consumer of milk.

1. The Applicant and Staff have failed to provide for year round testing of milk for radiation contamination and should be required to do so, with the results immediately provided to the producer.

t. Accidents

The Applicant and Staff have not developed a plan for the immediate notification to the local population in regards to the consumption of agricultural products grown or produced by themselves in the event of an accidental radiation release and should be required to do so. This notice is necessary due to the fact that area residents grow or produce large volumes of foods for their own private consumption.

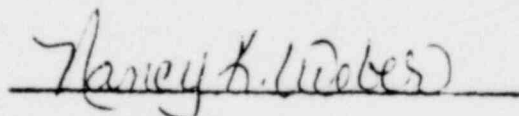
u. Radiation Monitoring

The Applicant and Staff have failed to develop a program for monitoring Strontium 89 and 90 in agricultural products and should be required to do so.

v. Crop and Domestic Farm Animal Contamination

a. The Applicant and Staff have failed to determine in the event of the repeal of the Price-Anderson Act the funds which would be necessary for full reimbursement of crop and domestic farm animal destruction should they become contaminated and should be required to do so, at full market value at the time of such an event.

b. The Applicant and Staff have also inadequately assessed the marketability of farm products contaminated by background radiation from manmade sources. Lack of adequate analysis of radiation releases from Nine Mile 1 and 2 and Fitzpatrick Plants combined with the proposed New Haven 1 and 2 Plants makes the estimates estimates of background radiation unrealistic and does not ensure the marketability of farm products.



Nancy K. Weber

Intervention Coordinator  
Oswego County Farm Bureau

Dated: May 10, 1979  
cc: All Service Addresses

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