

THE CITIZENS AGAINST NUCLEAR DANGERS,

Serving as a public interest ad hoc group to enunciate the concerns of many citizens living in relative close proximity to Salem Township,

Believing that the government has thus far failed to adequately protect these people from the risk of nuclear dangers, that might occur as a result of the operation of the Applicants' atomic power plant,

Determined to intervene in the interest of public health and safety,

The Citizens Against Nuclear Dangers hereby allege, contend, and aver the following:

Whereas, rather than trying to come to grips with the monumental problems associated with an emergency evacuation in the event of an atomic accident at the Salem Township site or elsewhere, the atomic industry has procrastinated and resorted to labeling criticism of the inadequate evacuation plans and procedures as "scare tactics,"

Whereas, the pathetic local civil defense system of reporting atomic accidents lacks adequate instruments to track radi activity much beyond the Salem Township atomic plant site, thereby jeopardizing the health and safety of everyone in a fifty mile radius, but especially the classes of people identified below.

Therefore, the Applicants' emergency evacuation plans cannot be accepted or approved by the Nuclear Regulatory Commission unless and until they are revised to include realistic logistical transportation assistance for the tens of thousands of hospitalized and institutionalized persons in nursing homes and mental treatment facilities, as well as the physically and mentally handicapped within a fifty mile radius of Salem Township;

Therefore, the Federal and state agencies designated to carry out the Interagency Radiological Assistance Plan and the Federal Preparedness Agency of the General Services Administration, et al, should be directed by the Nuclear Regulatory Commission to provide ambulance and other specialized transportation for the classes of citizens mentioned above, in the event of an atomic accident and high level radioactive release from the Salem Township atomic plant;

Therefore, to exclude provisions for the special transportation needs of the infirm, the elderly, and the handicapped, etc., in the Applicants' emergency evacuation plans is inhumane and an unconscionable outrage. It threatens to deprive these residents of life, liberty and property, and also imposes, unconstitutionally, unequal protection of the law and an unfair burden on them as opposed to able-bodied citizens who might be able to escape from an atomic disaster at Salem Township unassisted.

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Believing that the government has thus far failed to adequately protect these people from the risk of nuclear dangers, that might occur as a result of the operation of the Applicants atomic power plant,

Determined to intervene in the interest of public health and safety, the Citizens Against Nuclear Dangers hereby allege, contend, and aver the following:

Whereas, the major Applicant has been conducting meteorological monitoring and aquatic surveys as part of a pseudo-environmental surveillance program for the past several years at or near the Salem Township atomic power plant site, as a prerequisite to operating that facility;

Whereas, these scientific projects are viewed by the interveners as a transparent attempt by the Applicants to build their defenses against the inevitable charges that the Applicants will be polluting the environs of Salem Township and the Susquehanna River in the future;

Whereas, the need to scientifically evaluate the effects of low-level radiation on humans is far more important than merely monitoring its effects on wildlife;

Whereas, the Applicants have, unfortunately, thus far failed to conduct radiation studies on people living nearby to determine the disease causing impacts the Salem Township atomic facility would eventually have over a period of thirty years on human populations;

Therefore, as a reasonable and necessary precaution, the Nuclear Regulatory Commission should direct the Applicants, in conjunction with the EPA, and the Pennsylvania Departments of Education and of Health to commence with systematic human physical examinations employing the most advanced medical technology to study the link between low-level radiation and disease, such as cancer, on the human inhabitants cited herein;

Therefore, all pre-school and school age children through the senior high school, residing within a fifty mile radius of the Salem site, should be afforded a medically approved radiation check-up on an annual basis beginning with this school year;

Therefore, mobile monitoring clinics, staffed by state health professionals, should henceforth visit every school within a fifty mile radius of the Applicants plant site to carry out this annual testing program as a vital public health and safety precaution.