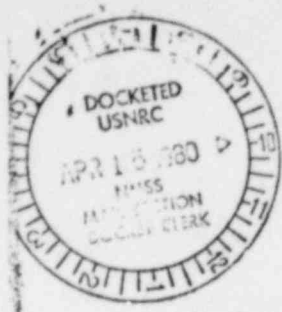


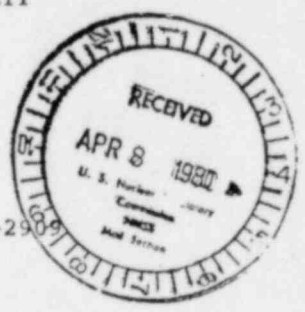
PDR

70-2909



BEFORE THE U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY

URANIUM FUEL LICENSING BRANCH



APPLICATION of Westinghouse)
Electric Corporation for a)
Special Nuclear Material)
License for the Alabama)
Nuclear Fuel Fabrication)
Plant to be located near)
Prattville, Ala.)

DOCKET NO. 70-2909

COMMENTS ON THE SCOPE OF THE
PROPOSED ENVIRONMENTAL IMPACT
STATEMENT

Comes now Randy Aronov, Intervenor-to-be, acting in his own right, and on behalf of other interested parties in the above-styled proceeding, and requests that the following issues be included in the draft environmental impact statement and be fully addressed therein:

- I. Any and all possible effects from the operation of the plant and any activity associated with the plant including but not limited to:
 - (a) transportation of any materials.
 - (b) storage and burial of any materials.
 - (c) discharge of any material into the environment.
 - (d) any affected population group, including but not limited to:
 - (1) plant workers.
 - (2) plant workers families.
 - (3) area residents.
 - (4) persons living down stream from the plant.
 - (5) biological life in the Alabama River, in Mobile Bay, in the Gulf of Mexico, and in Autauga, Montgomery, Elmore and surrounding counties, in areas on or near any and all possible transportation routes.

The above possible effects should include but not be limited to the effects on the economic, physical, and mental well-being of

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the above populations over a period of 10,000 years. The above - mentioned plant operation should include but not be limited to normal plant operation.

(e) abnormal plant operation, due to:

- (1) acts of God (flooding, tornado, earthquakes, etc.
- (2) sabotage
- (3) faulty machinery
- (4) worker error

- II. The effect on the proposed channelization of the Alabama River with respect to flooding or any changes in water levels, flood tables, water tables, etc. of the plant.
- III. The effect of the release of radioactive substances into the environment on ground water, possible cavern systems, underground streams, rivers and artesian wells.
- IV. The effect of the burial of radioactive wastes on these ground water systems, underground streams, rivers and artesian wells.
- V. The effect of the release of radioactive substances and the burial of radioactive wastes on the living organisms in these environmental niches.
- VI. The security measures necessary to be taken to insure against sabotage and terrorism in the transportation of radioactive substances to and from the plant, in the operation of the fabrication plant, in the disposal and release of radioactive pollution, and in the burial of radioactive wastes?
- VII. The impact of the use of plutonium at the proposed plant, based on the reasonable assumption that during the 40 year estimated life of this plant the fabrication of plutonium will become necessary due to the dwindling supply of fuel grade uranium which many estimate will deplete entirely by the year 2000. A projection of a 40-year life of the plant, therefore, necessitates the use of plutonium and should be addressed in the

present subject impact study, rather than in a possible later study prior to licensing for plutonium fabrication.

VIII. Economic impact from shut-down from any cause prior to 40 years and possible negative effects from any accident for a period of 10,000 years, including the impact and effects on any biological life, and especially human life.

IX. The impact over a 10,000 year period on any affected population, without unreasonable or arbitrary geographical limit, from plant operation and activities necessary to this operation, specifically, but not limited to:

- (a) economic effects from disruption or discontinuance of operations in years 5, 10, 20, 30 and 41.
- (b) Economic and biological effects from worst possible accident.

X. The effects of noise from transportation vehicles and other sources on all plant, animal and human life including but not limited to:

- (a) plant workers' families.
- (b) area residents.
- (c) persons living down stream from the plant.

April 3, 1980
DATE

Randy Aron
Intervenor-to-be

Julian McPhillips
Julian McPhillips
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served copies of the foregoing on the Executive Legal Director, U.S. Nuclear Regulatory Commission, W.T. Crow, U.S. Nuclear Regulatory Commission, Division of Fuel Cycle and Material Safety, and on Thomas M. Dougherty, Esq., attorney for the applicant. I have filed the original with the secretary of the Commission, U.S. NRC.

April 3, 1980
Date

Julian McPhillips
Julian McPhillips