

November 22, 1989

Administrative Judge Peter B. Bloch  
Presiding Officer  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission

PETITION OF DONALD W. WALLACE  
FOR LEAVE TO INTERVENE AS A PARTY

In the Matter of  
  
ROCKWELL INTERNATIONAL  
CORPORATION  
Rocketdyne Division  
  
(Special Material License  
Number SNM21)

Docket 70-25  
  
Request to Renew  
For One Year

ASLBP No. 89-594-01-ML

Dear Judge Bloch,

In response to your notice and order on the amended petition referenced above, I hereby petition in writing to intervene in the proceedings to consider the renewal request. I made a verbal request to intervene at both the limited appearance session on September 28, 1989, and at the prehearing conference on September 29, 1989.

STANDING

I clearly meet the standards for intervening as a party. I own twelve acres of undeveloped property within two miles of the Santa Susana Field Laboratory. I work as a Fire Captain for 56 hours a week at a fire station just over five miles from the site, and I live less than ten miles from the site. My physical and psychological health and safety, and my economic interests will be directly affected by the outcome of the licensing proceedings. If the license is granted my property values could be adversely affected by limiting the number of potential buyers to those who choose to disregard the disclosure of hazards required by California law. My psychological health will be adversely affected by my close proximity to a facility handling deadly radioactive materials which are subject to the NRC license. My physical health could be affected by exposure to releases of those licensed radioactive materials through inhalation of airborne particles or ingestion of contaminated surface or ground water, or through currently unknown or unforeseen circumstances.

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PDR ADOCK 07000025  
C PDR

AREAS OF CONCERN

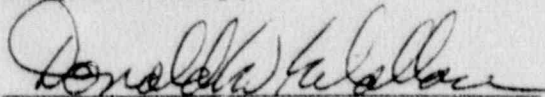
At the prehearing conference you said that I would be granted party status, upon written request, for my stated concern regarding the applicants misleading and deceptive statements contained in the application in the "ON-SITE RADIOLOGICAL CONTINGENCY PLAN FOR ROCKWELL INTERNATIONAL OPERATIONS LICENSED UNDER SPECIAL NUCLEAR MATERIAL LICENSE NO. SNM-21" dated July 25, 1988, and revised May 19, 1989. You made my charges and the extracts which I handed you a part of the permanent record and I ask that those be incorporated into this petition by reference. I repeat that I will present evidence that the Contingency Plan contained false and deceptive statements designed to mislead the NRC.

I also stated my concern at the prehearing conference about the issue of worker health and safety. As the former president of a trade union in a particularly hazardous job, I have particular concern for the health and safety of workers. In my review of the application I noted that both engineered devices and written programs are outdated and inadequate to protect either employees or the public. I will present documentary you with evidence to support this charge.

I am also concerned about transportation hazards associated with licensed materials, the dramatic increase in population surrounding and near the site, and the adequacy of monitoring and security of licensed materials.

In view of the foregoing considerations, I respectfully request party status to the proceedings for License No. SNM-21.

Respectfully,



Donald W. Wallace  
1710 N. Cold Canyon Rd.  
Calabasas, CA 91302  
818 888-0125

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing PETITION OF DONALD W. WALLACE FOR LEAVE TO INTERVENE have been served upon the following persons by U.S. mail, first class, except as otherwise noted, and in accordance with the requirements of 10 CFR Sec. 2.712.

Atomic Safety and Licensing Appeal  
Board  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555

R.T. Lancet, Director  
Rockwell International Corporation  
Rocketdyne Division  
6633 Canoga Avenue  
Canoga Park, CA 91304

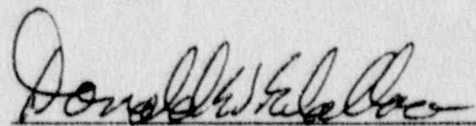
Estelle Lit  
18233 Bermuda St.  
Northridge, CA 91326

Administrative Judge  
Peter B. Bloch  
Presiding Officer  
Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission, Washington  
D.C. 20555

Jon Scott  
6 Roundup Rd.  
Bell Canyon, CA 91307

Jerome E. Raskin, et. al.  
c/o 18350 Los Alimos  
Northridge, CA 91326

Dated at Calabasas, CA. this  
22 day of November 1989

  
Donald W. Wallace, petitioner