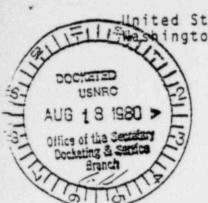
Snaron A. warren 636 Hillcrest Midland, MI 48640



Inited States Nuclear Regulatory Commission

In the Matter of Comsumers Power Company (Midland Plant - Unit 1&2)

Docket Nos. 50-329-0M 50-330-0M

Supplement to the Petition to Intervene

In order to meet the requirements of the petition to in intervene required by Section 2.714 and other pertinent sections of the Nuclear Regulatory Commissions Rules of Practice, I wish to make the following statements:

- 1. The composition of the fill soil used to prepare the site of the Midland Plant-Units 1 and 2 is not of sufficient quality to assure that pre-loading techniques have permanently corrected soil settlement problems. The NRC has indicated that random fill dirt was used for backfill. I contend that the components of random fill dirt can include loose rock, broken concrete, sand, silt, ashes, etc. all of which cannot be compacted through pre-loading procedures.
 - 2. The known seepage of water from the cooling pond into the surrounding soil poses a threat to the reliability of the construction integrity of this plant and its safety systems. We know that the entire Saginaw Valley is built upon centuries of silt deposits--which are highly permeable.
 - 3. Dewatering procedures are inadequate in the event of increased water seepage, flooding, failure of pumping systems, power outages and especially considering the composition of the soils being dewatered. According to Consumers Power dewatering will keep water levels below 616 feet. I contend that under the conditions previously mentioned, they cannot guarantee that these stated levels could be maintained.
 - 4. I contend that the pre-loading procedures undertaken by Consumers Power have violated the structural integrity of the diesel generating building and its plumbing and electrical components.

I reserve the right to ammend these contentions at any future date.

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Executive Legal Director
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