

POOR ORIGINAL

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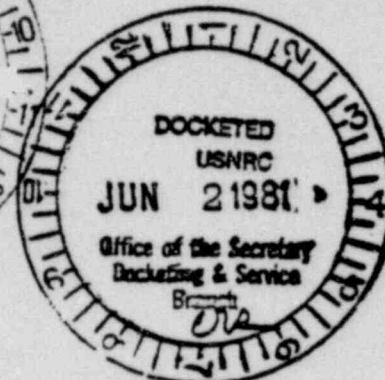
Older Americans for Elderly Rights
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5/29/81

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Attention: Docketing and Service Branch

PETITION FOR LEAVE TO INTERVENE

Older Americans for Elderly Rights (hereafter referred to as O.A.E.R.), a senior citizen non-profit organization incorporated in Illinois law, and based in Rock Island County, Illinois, (at 1806 2nd Avenue, Rock Island, Il. 61201) requests the Commission to grant a hearing and the right to intervene in the matter of Commonwealth-Edison Company's request for an amendment of its Facility Operating License Nos. DPR-29 and DPR-30, for operation of the Quad Cities Station, units 1 and 2 located near Cordova, Il.

The proposed amendment would modify the technical specifications to increase the combined spent fuel storage capacity from 2920 spaces to 7570 spaces.

This petition is filed pursuant to Section 2.714 and 2.715 (c) of Title 10 of the Code of Federal Regulations Part 2 and the "Notice of Proposed Issuance of Amendments to Facility Operating Licenses" April 30, 1981 (46 F.R. 24336).

Interest of O.A.E.R.:

1. Most of the membership of O.A.E.R. (341, at last count) live in the effected area, within a 25 mile radius of the Cordova Station, which makes the group interested parties to the license amending request.
2. Tripling the spent fuel storage at Cordova would drastically increase the possible health hazard in the area at a time when most recent findings (e.g. Science Magazine, May 25, 1981) indicate that low-level radiation, so-called, is proving to present a greater risk to life and health than was originally thought to be the case.
3. The long life of the spent fuel radiation merely compounds an already hazardous situation by projecting the danger long into the future and making necessary extensive and expensive surveillance.
4. Provision for safety at Cordova, in the matter of storage especially, also, constitutes a problem which should be positively related to before any increase in storage space be designated. (Recent evacuation drills at Cordova—Wednesday, May 20, 1981—have received mixed reviews, leaving the whole matter of general safety uncertain.)
5. Possibilities of environmental pollution, e.g., land, Mississippi

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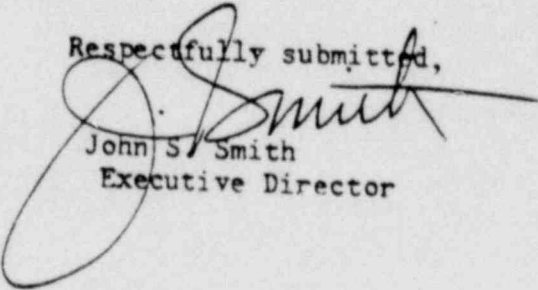
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- and atmosphere are further dangers attending any increase in storage of spent fuel at Cordova.
6. Recent scientific findings placing the Quad-Cities and Cordova on a major earthquake fault line (long overdue, the finding report) multiplies further the risks of making the Quad-Cities Station a large storage area for spent fuel.
 7. Occupational hazards to station workers from exposure to increased radiation emanating from defective fuel stored in the spent fuel pool are another matter of concern for local residents.
 8. The risk in so multiplying storage space at Cordova as to make a major "dumping ground" for radioactive waste in this neighborhood of Illinois creates an unwelcome precedent for future on the spot storage.
 9. The possible dangers involved in transit of spent fuel from Commonwealth-Edison Company's other plants to the Cordova station broadens considerably the area of possible contamination.
 10. The present uncertainty in the nuclear power industry as to cost raises the further question of whether or not Commonwealth-Edison will be ready and able to make the necessary, costly adjustments, if and when the storage facility requires major alteration and repair.

O.A.E.R. has no property or financial interest which would be effected directly by granting the request of Commonwealth-Edison in the licensing matter, except the property investments of its members who live in the involved area.

Thus, O.A.E.R. requests a hearing and the right to intervene in Commonwealth-Edison Company's request to amend its Facility Operating License as reported in Notices, Federal Register, Vol. 46, No. 83, Thursday, April 30, 1981, p. 24336.

Respectfully submitted,


John S. Smith
Executive Director