NORTHERN MICHIGAN ECO-WATCH

Promoting Environmentally Sound Choices and Changes P.O. Box 631 Petoskey, MI 49770

January 15, 1990

Mr. Kenneth Carre Nuclear Regulatory Commission Chairman, Nuclear Reactor Regulation Operating Reactors Branch No. 2 Washington, DC 20555

Dear Mr. Carre,

In response to the <u>Letter of Intervention</u> (see enclosed) filed with the Nuclear Regulatory Commission (NRC) by the Concerned Citizens for the Charlevoix Area regarding Big Rock Point Nuclear Power Plant, Northern Michigan Eco-Watch has drafted the attached <u>Resolution of Support</u>. Our resolution is being sent to appropriate state and federal Senators and Representatives, to Governor Blanchard, and to the environmental groups listed below.

It is our hope that you will again review the <u>Letter of Intervention</u>, and act as soon as possible to protect the ecological region surrounding this dangerous and inefficient power plant. Please help protect the Great Lakes Basin by ordering the shut down of Big Rock Point as suggested in this Intervention.

Please inform us of your intention and progress.

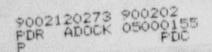
Thank You,

Dale S. Scutt

Rep. Bob Davis
Senator Don Reigle
City of Charlevoix
Gov. J. Blanchard
Rep. Tom Alley
NIRS
MEC
UPEC
Greenpeace
Lone Tree Council
MUCC
WMEAC

Pat Gagliardi
City of Petoskey
Boyne City
CRAW
Public Citizen
Safe Energy Coalition
Don't Waste Michigan
Nuclear Free America
Great Lakes United
SWAC
Sierra Club
Boards of Realtors

Mitch Irwin
City of Harbor Springs
Senator Carl Levin
NMEAC
Mary Sinclair
CEQ
HOPE
Terry Lodge, Attorney
Evergreen Alliance
SMEAC
WATCH



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Promoting Environmentally Sound Choices and Changes
P.O. Box 631
Petoskey, MI 49770

December 21, 1989

Re: The November 11, 1989 petition to the Nuclear Regulatory Commission (NRC) by The Concerned Citizens for the Charlevoix Area.

Northern Michigan Eco-Watch supports the November 11, 1989 letter of intervention submitted to the Nuclear Regulatory Commission by The Concerned Citizens for the Charlevoix Area. We join them in this intervention by calling for the updating and retrofiting of the Big Rock Point Nuclear Facility. We believe this facility, owned and operated by Consumers Power Company of Jackson, Michigan must meet minimal current worker safety and environmental standards and agree that operations at Big Rock should cease until these objectives are met. We support the intention for the well-being of the citizens and environment surrounding Big Rock.

We find it entirely unacceptable that tens of thousands of Curies of radiation are dumped into the Little Traverse Bay environment annually, that large amounts of highly radioactive waste are produced and stored on-site at Big Rock, and that large amounts of low-level radioactive waste are transported over our roads and past our homes. It is time to stop the radioactive pollution of the Little Traverse Bay environment.

It is appalling that Big Rock has been allowed to jeopardize the health of its workers, residents of the area, and the air, soil, and water vital to all living things through continued operation under Cost/Benefit criteria. Cost/Benefit assessment is couched in such factors as Grandfathering, Probabilistic Risk Assessment, As Low As is Reasonably Achievable, Experimental Status, and Low Societal Risk. Clearly, none of us would choose to be considered components of a Low Societal Risk factor, where our communities are reduced to numbers for some variable in an economic/Probabilistic Risk Assessment equation. We do not want an Experimental Status facility which has been Grandfathered indefinitely, without regard for current safety standards.

We seek enforcement of the U.S. Court of Appeals decision stating that Cost/Benefit assessment may not be a factor that overrides the health of the environment and inhabitants of the area with respect to technological improvements necessary to meet safety standards. Additionally, we seek enforcement of the D.C. Circuit Court decision that permissible emission standards should consider only health, "not cost or technological feasibility" (see Washington Post, August 5, 1987).

We ask the NRC to order Consumers Power Company to cease operations at Big Rock until it is in compliance with current standards and court decisions.

Dale S. Scott

Nal Sch President, Northern Michigan Eco-Watch

616-526-9313

Mike Winnell Therparks

Vice-President