

DOCKETED
USING

*82 MAR 11 P1:25

Docket 50 - 289

8203190395 820309
PDR ADDCK 05000289
G PDR

2. As noted in Aamodt exceptions (15, 34), the Board did not perceive the thrust of the intervenors' findings. For instance, in summarizing the intervenors' findings (PID #1921), the Board omitted the central issue : the farmers' personal health and safety.

3. The Board erred, as noted in Aamodt exceptions (17, 35), in their failure to distinguish between property per se (or, in the case of the farmer, livestock) and the relationship between the farmer and this particular property. PID #1924. The Board ignored the clear evidence that the relationship is so binding that the farmers would remain with their animals in the event of a general emergency and evacuation of the population surrounding Three Mile Island Unit 1.

4. Aamodt Finding 49 (filed August 13, 1981) brought the relationship to the Board's attention and included the following transcript references: Tr. 202, 253 (Smith); Stewart and Smith ff. 20, 243, at 10*; Tr. 18, 691 (Lytle); Tr. 19, 769 - 70 , 19, 775 - 76 (Samples). Other record evidence, cited by the Combined Intervenors Findings 441 - 443, 447 and adopted by the Aamodt's Finding 2, were Tr. 18, 831 (Samples); Tr. 18, 787 (Weber); Tr. 18, 749 (V. Fisher); Lytle ff. 18, 749.

*Since the Stewart and Smith testimonies were bound together, the Aamodt's counted the pages consecutively beginning at Summary. This is the same reference as Combined Intervenors' John Smith Tr. 20, 243 at 3 in their finding 447.

5. Whereas the Commission has chosen to have public health and safety take clear precedence over actions to protect property (45 Federal Register 55407), the Commission cannot mean that to exclude any considerations of property. If it can be shown that actions to protect particular property are needed to protect the health and safety of people, those actions are clearly within the intent of the Commission's new emergency planning rules. The rules state that "the state of onsite and offsite emergency preparedness (must provide) reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency". 10 CFR 50.47 (a)(1).

6. The Commission's new rule states that a "range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public" as a standard for acceptable planning. 10 CFR 50.47 (b)(10). This range has included thyroid prophylaxis, sheltering and evacuation. Commonwealth Ex. 2.a. ff. 17814. Although the Commonwealth listed these options in their plans for farm operators (Id., Appendix 7, at 15, 16), the Commonwealth admitted that farm operators may consider evacuation unfeasible. Id., Appendix 7, at 17.

7. Considering the testimony of the farmers, veterinarians and county agricultural agents cited in paragraph 4 supra, it can be clearly established that the option of evacuation will not be taken early, if at all, by the farmers if livestock must be left.

Smith ff. 21, 243, at 10 (3):

Question: Would farmers be willing to evacuate and abandon their livestock?

Smith: No, they would be the last to leave.

Tr. 18, 769 (Samples):

I asked a couple (of farmers) this morning would they go and basically the older farmers are no, they would not go.

Tr. 18, 775 - 76 (Samples):

The only thing that would make these farmers leave...would be if they were absolutely convinced---this is only some of them---absolutely convinced that if they stayed, they would die.

Tr. 18, 787 (Weber):

...they would rather die than leave their animals there, and I think they would stay.

Lytle ff. 18749:

Each (cow) is known to me by name and I consider them my employees...I would not abandon my cows..

V. Fisher ff. 18749:

During the TMI-2 accident, I remained on the farm to attend the animals while my family evacuated. It did not seem right to go off and abandon the animals.

was

8. The witnesses whose testimony/ cited in paragraph 7 supra are extremely knowledgeable and creditable concerning whether farmers would evacuate during a general emergency. Mr. Smith has been the agricultural agent for York County, Pennsylvania for 29 years. Smith ff. 21, 243, at 8(1). Dr. Weber has been a veterinarian for 33 years to the herds on the west bank of Susquehanna River in the vicinity of Three Mile Island. Weber ff. 18, 799. Dr. Samples is a ^{large animal} veterinarian, practicing on the east side of the river and is a member of the Commonwealth's Radiation Protection Emergency Management Committee and a committee which advises the Pennsylvania concerning livestock problems. Tr. 18, 755 - 59 (Samples). Mr. Lytle has been a dairy farmer for 30 years and presently tills 300

acres three miles north of the TMI nuclear plants. Lytle ff. 18, 749. Mr. Vance Fisher farms 160 acres three miles from TMI-Unit 1; he was raised on the adjacent farm and has farmed on his own for the past 30 years. V. Fisher ff. 18, 749.

9. The Board skipped over the testimony of the credible witnesses presented, in part, in paragraph 7 supra, to state that the emergency plan is not deficient or defective absent ^{specific} any plan of/ provisions for the protection of livestock. PID #1924. The Board cited the testimony of FEMA witnesses which considered the farmer "a member of the general public" in the application of protective actions. The Board depended on opinions of witnesses, unacquainted with the farmers, to assume that a range of protective actions ^{available to the general public} would be available to the farmers. See resumes Chestnut at Tr. 15, 007; Adler and Bath at Tr. 18, 975 and Rogan at Tr. 13, 756. This and the Board's other references pointed to the Commonwealth's Department of Agriculture plan as the means by which the farmers could overcome the handicap of their livestock in availing themselves of full range of protective actions. Rogan, et al., ff. Tr. 13, 756, at 113; Chesnut, ff. Tr. 15, 007, at 67 - 68; Adler and Bath (3/16/81), ff. Tr. 18, 975, at 50.

10. The Board addressed the Department of Agriculture's plan for farmers in their paragraphs #1925 and 1927. The Board again depended on the incredible testimony of Licensee's witnesses

to describe the plan as "extensive" (Rogan, et al., ff. Tr. 13, 756, at 113). PID#1925. The resumes of Rogan, et al., (Giangi and Tsaggaris) do not contain any reference to any agricultural experience or education. Id., at Appendix A. The Board diminished the testimony of credible witnesses characterizing their evaluation of the plan as "impractical" for "all farms in the TMI area". PID #1927. (Emphasis added).

11. The Board mischaracterized Dr. Samples testimony concerning the applicability of the plan for farms in referencing his testimony at Tr. 18, 766 - 67. PID # 1927. Dr. Samples was asked:

..could I infer from what you said that in your judgment it is not possible to shelter the largest percentage, a majority of the dairy herds that you come in contact with in this area?

Samples: You cannot shelter them as I see written in this plan.

12. The Board also mischaracterized Mr. Lytle's testimony at Tr. 18, 738 referenced in PID # 1927:

Is it fair to say that the Commonwealth's suggestions on sheltering are not practical?

Lytle: Yes, sir.

13. Neither the Board, nor the Licensee, nor the Commonwealth presented a single witness with experience or education in agriculture who testified that the Commonwealth's plan was practical for a single farm. The Commonwealth's agricultural experts Drs. Van Buskirk and Cable conceded that water storage recommendations of the plan were unworkable. Tr. 18, 326 (VanBuskirk). These

witnesses were not acquainted with the 'housing' arrangements for farm animals in the TMI area and did not know the shielding factors of various structures. Tr. 18, 329 - 30 (Cable, Van Buskirk).

14. The recommendations of the plan for farmers were adopted verbatim from the County Extension Service handbook for use in civil defense. Tr. 20, 254 - 55 (Smith); Tr. 20, 235 - 36 (Stewart). The handbook was written about 20 years ago. Tr. 20, 236 (Stewart). The county agents for York and Dauphin Counties had never checked to determine whether the farmers would be willing to implement the plan or had capabilities to implement the plan. Tr. 20, 268 - 71 (Stewart, Smith). No evidence was presented that the plan had ever been tried at anytime in the twenty years since it was conceived.

15. In addition to the testimony in paragraphs 11 - 13 supra concerning the infeasibility of the agricultural plan in its conceptual aspects, neither the county agents (nor any other witness) as a practical matter knew/where clean barrels in the quantity needed to afford an emergency water-shed were available. Stewart, ff, 20, 243, at 4(3). Tr. 18, 308 - 10 (Cable, VanBuskirk). Mr. Lytle's cow herd would require 200 barrels to provide ^afor/48 hour water supply, and assuming availability of drums, Mr. Lytle would not have the capability of storing and using them. Tr. 18, 695 (Lytle).

16. The Board also failed to appreciate the potential exposure of the farmer in attempting to facilitate the Commonwealth plan or

any other plan. The Commonwealth adopted a late position, after the record was closed, that thyroid prophylaxis (KI), dosimetry and training would be made available to the farmers. PID #1925, Footnote 214. The Board did not consider this move (Id.), needed/ maintaining that "Protective measures in the form of sheltering are available to the farmers." PID #1926. The Board did not explain how the farmers would be able to care for the animals and be sheltered.

17. The Commonwealth would not hesitate to recommend that cows be taken off pasture if there was reason to suspect or expect an airborne iodine problem. Tr. 18, 151 (Reilly). Movement of animals in a manner that is not routine takes time. Tr. 18, 731 (V. Fisher). The range of times between onset of an accident and the start of a major release is in the order of one-half hour to several hours. Commonwealth Ex. 2.a. Appendix 7, Annex B, at 2. The possibility of the exposure of the farmer is evident. The Board's position that the farmer can take shelter is unsupported by the evidence. Consider that milking of the cows takes four persons eight hours at the Lytle farm which is a typical dairy farm in the TMI area. Tr. 18, 739; 18, 708 (Lytle). Even the Commonwealth provisions of supplies to equip one worker per (PID #1925, Footnote 214) farm/fall far short of those needed on a typical farm.

18. The Board considered that the farmers have other options than to remain and care for their livestock. PID #1925. One was for the farmers and their families to evacuate, leaving their livestock behind and notifying their county agricultural agent. PID #1925. The Board evidently assumed that this arrangement would be satisfactory to the farmers. No farmer, veterinarian or county agent was asked. The Board also depended on the flimsy ^a testimony of Department of Agriculture witness that the abandoned livestock could or would be cared for. PID #1928; Paragraphs 19, 20 supra.

19. Dr. Weber, ^{a veterinarian,} testified that the farmers would not elect to leave and let the care of their animals to another person. Tr. 18, 787 (Weber). Some farmers will not even entrust the care to their animals to someone they know. Tr. 18, 788 (Weber). The Board ^{not recognize this} did not recognize this evidence that the farmers would not take an action entrusting their animals to the care of others and cited no evidence that they would take this option.

20. One Commonwealth witness, Dr. Cable of the Department of Animal Husbandry (ff. 18, 296, at 6), did not know how emergency workers could be provided to care for abandoned livestock. Tr. 18, 304. Another Commonwealth witness, Mr. Furrer of the Department of Agriculture, knew of 57 officers of the State Department of Agriculture who could be diverted to provide assistance. Tr. 18, 853. The Board depended on this testimony as evidence that assistance could be provided in caring for abandoned livestock.

PID #1928. (Board references Tr. 18, 850 - 51 (Furrer) and Tr. 18, 302 - 03 (Cable) do not support their conclusion.) Mr. Furrer did not know how many farms are located in the plume EPZ (Tr. 18, 854) and no one has been assigned the task of formalizing plans for assistance. Tr. 18, 850 (Furrer). The Board clearly had no basis for stating that the farmers could arrange for assistance in caring for the livestock ^{they} that/might abandon in order to evacuate themselves and their families.

21. The Board would plan on the assistance of the evacuated farmers who would be allowed to return to their livestock for maintenance purposes during the period of general public evacuation. PID #1929. How can they without taking any measures for assuring that the farmers are protected by all available means, for instance, thyroid prophylaxis, dosimetry and protective clothing? The Board cannot assume that the farmers' exposure would be limited to a few hours; as discussed in paragraph 20 supra, there is no assurance of adequate numbers of emergency workers to care for abandoned livestock, and typical farms in the TMI area require 16 man-hours for a single milking. Tr. 18, 739 (Lytle).

22. The third option that the Board considered available to protect the health and safety of the farmers was evacuation of the livestock. PID #1925. The Commonwealth's planning does not provide a means for the evacuation of livestock. VanBuskirk and Cable, ff. Tr. 18, 296, at 3; Adler and Bath (3/16/81), ff. 18, 975, at 50.

23. The Board assumed, contrary to the record evidence, that there are a number of commercial livestock haulers in the TMI area. PID #1928, Footnote 217. The record evidence was that the farmers would be contesting for the same trucks. Three witnesses examined on the availability of commercial cattle truckers were most familiar with the /Hostetter agency at the Lancaster Stockyards. Tr. 20, 234 (Stewart); Tr. 20, 241 (Smith); Tr. 18, 727 (Lytle). (Lancaster Stockyards are located in Lancaster, Pennsylvania, approximately 50 miles from TMI.)

24. The Board would have an evacuation of cattle depend on the use of the farmers' small trucks which can carry six to ten head of cattle. Tr. 18, 737 (Lytle); Tr. 20, 234 (Stewart). The Board did not seek evidence of the number of small trucks available and conceded that their use would limit the evacuation. PID #1928, Footnote 217.

25. The Board thus assumed based on the limitations discussed in paragraphs 23 and 24 supra that the farmers have the option of evacuating their livestock.

26. The Board conditioned this third option by asceding to the Commonwealth's position that evacuation of livestock may only be permitted on an individual case-by-case basis. PID #1930. The mechanism for approval of herd health in order to obtain permission to move a herd was not stated in the 'fact-sheets' that were to be /distributed to the farmers. Commonwealth Ex. 2.a., Appendix 7; Tr. 20, 411 - 22 (Furrer); PID #1927. In fact, Appendix 7 stated that evacuation of livestock will not be called for and should, in fact,

not be undertaken. Appendix 7, at 17.

27. The Board did not consider the lack of planning for the evacuation of livestock a planning deficiency. PID #1924. The Board, in fact, referenced at this point the testimony of FEMA witnesses which clearly opposed the evacuation of livestock. Id. (Adler and Bath (3/16/81), ff. 18, 975, at 50).

28. The Board summarized the impact of the three options concerning protection of livestock as no guarantee for the safety of the livestock. PID #1931. The Board has summarized correctly. The Board failed to include that the farmer's pursuit of the options provided by the Board offered no guarantees for the health and safety of the farmer. The first option (remaining and tending the livestock) would put the farmer clearly at risk; the second (abandoning the cattle) would be unthinkable to most farmers - returning to attend the cattle during a general emergency would put the farmer clearly at risk; the third (unplanned evacuation of cattle) would be impossible to accomplish. ^{At the same time,} /the Board did not provide for all means of protective devices to be provided to the farmers.

then
29. The Board were were/content with a number of meaningless measures for self-protection of farm personnel. PID # 1932. These were described as an information pamphlet the Licensee will distribute to the public within the plume EPZ. Id. These pamphlets describe the protective strategies of sheltering and evacuation. Commonwealth Ex. 3, 4, 5, 7. The Board did not explain how this general information would overcome the major obstacle to the farmers taking shelter

or evacuating, namely the livestock. The Board assumed that the phamplets contain the information needed by the farmers to protect themselves and their families in a radiological emergency. PID #1932. The Board cited no reference to the record of evidence.

30. The Commonwealth's phamplet (Ex. 3) would ^{not} compel the farmers to take protective action. Dr. Samples testified that the farmers would not evacuate unless they were absolutely convinced that they would die if they remained. Tr. 18, 775 - 76. The phamplet likens ionizing radiation emitted from a nuclear power plant to the sunlight. Commonwealth Ex. 3. This analogy would foster a perception of innocuousness.

31. The county phamplets do not contain the telephone number(s) of the county agricultural agents who are to work closely with the farmers during an emergency, according to PID #1932. Commonwealth Ex. 4, 5, 7.

32. The Board based their finding that "the county agricultural agent, an emergency worker, will work closely with farmers during an emergency" on the testimony of FEMA witnesses. PID #1932. The sum total of this working relationship according to the testimony of the agents and the Commonwealth's witnesses would be the relay of information from the farmers to other agencies who may be able to provide assistance. VanBuskirk and Cable, ff. 18, 296, at 2.

33. The Board failed to acknowledge the record evidence concerning the limitations of the county agents in asserting a "working relationship" with the farmers during an emergency. PID #1932. The agents who testified had not had any training in radiation detection or protective actions for approximately 20 years. Stewart and Smith, ff. 20, 243, at 5(4), 10(3). The agents did not know how to use radiation detection equipment or to recognize radiation illness in livestock. Id. The willingness of the agents to remain as emergency workers at higher levels of radiation exposure than the general public was not probed. One agent testified "In the case of high radiation, we were supposed to take care of ourselves and our families first, we were told." Tr. 20, 262 Stewart.

34. Concerning protection of foodstuffs, the Board found that information would be distributed to the farmers in the TMI plume EPZ. PID #1932. The new emergency rules state that the ingestion pathway EPZ shall consist of an area about 50 miles in radius. 10 CFR 50.47(c)(2). The plume EPZ for TMI is about 10 miles in radius. Commonwealth Ex. 2.b.; PID #1614, 1615. The Board failed to determine the ingestion pathway EPZ as called for in the new emergency rules. 10 CFR 50.47(c)(2).

35. The new rules state that protective actions for the ingestion pathway that are appropriate to the locale should be developed. 10 CFR 50.47(b)(10). The local custom of the farm family consuming the milk from their cows was brought to the Board's attention. Generally, Tr. 18, 220; 18, 225 - 26; 20, 544 - 48. The range of

I-131 concentrations in milk at the farm can be quite substantial. Tr. 20, 547 (Petersen).
Tr. 18, 220 (Reilly);/ Not all farms are expected to be sampled in the event of a radiological disaster. Tr. 20, 405 - 07 (Fouse).
The milk at the dairy would have the minimum contamination due to dilution and decay. Tr. 18, 220 (Reilly). The Commonwealth bases their recommendations concerning milk consumption on the contamination at the dairy. Tr. 18, 225 (Reilly). They do not take into account that a farm family may have a sole source. Id.

36. The Board concluded that farmers who get their milk from their own cows will be advised concerning possible contamination of their milk. PID #1932. The mechanism for notifying the farmers, (Id.), the milk sanitarians/ is not adequate to reach the numerous farms and farmettes in the 50 mile EPZ. The sanitarian did not know the extent of the cow population in the 10 mile EPZ; sampling of milk extended no more than 38 miles; and the extent to which cows were shielded was not taken into account in sampling. Tr. 20, 404 - 14 (Fouse). The Board's conclusion that the farmers will be protected from drinking contaminated milk is not based on substantial evidence.

37. Depending upon the nature of a given accident, the ingestion pathway may far outweigh the plume pathway in providing the nearby population with radiologic insult. Molholt, ff. 19, 690, at 2.
The Commonwealth sampled milk at 36 farms during the TMI-2 accident. Tr. 20, 405 (Fouse). Eleven farms were sampled within five miles

of the plant, eleven within 5 and 10 miles, three within 10 and 20 miles, one at 20 miles, and three out to 38 miles. Id. The possibility of undetected radiological insult to a farm family consuming all their food from their own farm is real. It is well known that plume touch down patterns vary enormously according to height of release, geography, speed and direction of wind and turbulence.

38. The Board rejected the proposal that the thyroids of small rodents naturally present in the TMI area would be a more sensitive and reliable measure of radioactive iodine in the environment. PID #1716, 1717. The use of animal thyroids integrates all exposure pathways to man: Ingestion of vegetable and animal products plus inhalation. Utilization of an integrated monitor would be more reliable than the Commonwealth use of separate PAGs for projected thyroid doses from the inhalation pathway and the ingestion pathway. (Commonwealth's measures of iodine-131 exposure are set forth in Commonwealth Ex. 2.a., Appendix 8.) Commonwealth's concentration on the milk pathway ignores other ingestion pathways.

40. In light of considerable field vole thyroid gland contamination by iodine-131 in the downwind area after the TMI-2 (Molholt, ff. 19, 690, at 14), accident, it is difficult to justify the Board's assertion (PID #1717) that "measurements of radioiodine in milk are more reliable than measurements from the thyroids of field animals.

41. The Board asserted (PID #1717) that milk sampling for radioiodine is more meaningful and more accurate for evaluating doses to man than measuring animal thyroids. The witness's testimony cited by the Board noted that field voles are not part of ^{human} ~~the~~/diet and therefore concentration/within the voile is of ^{of iodine-131} no significance to man, and that the transfer factors from air and forage to voile thyroid are not known. Tr. 18, 241 - 42 (Reilly). The Board failed to concede that milk is only more meaningful as an environmental monitor if it presents the major exposure pathway to human beings at risk. This is certainly true for most infants, but what about those consuming large amounts of leafy vegetables grown near a radioiodine source? The Board's claim that milk sampling is more accurate is unsupported as discussed in paragraphs 35 and 38 supra.

42. The Board dismissed the clustering of neonatal hypothyroidism cases as indicative of the Commonwealth's inaccurate screening of iodine-131 following the TMI-2 accident. PID #1719. The Board did not deny, however that neonatal hypothyroidism rates doubled in Pennsylvania east of Harrisburg during the nine months after the TMI-2 accident as compared to the nine months before. Id.; Molholt, ff. 19, 690, at 13. The Board asserted that the increased rates of neonatal hypothyroidism were not spatially distributed in a manner which would be expected if they resulted from radioiodine releases from the TMI-2 accident. PID #1719. That spatial distribution was not inversely proportional with the square of the distance from the TMI-2 reactor should not be surprising. When one breaks down

this distribution on a county by county basis, rather than regional examination (e. g., Pennsylvania east and west of Harrisburg), one faces the statistical uncertainty of small numbers (Poisson distribution). Furthermore, rather than integrating this distribution over the entire period of the accident, wind direction during the bursts of radioiodine release must be correlated with the distribution of neonatal hypothyroidism cases. The Board argued that there were no cases of neonatal hypothyroidism in Dauphin County in the nine months following the accident although that county is closest to TMI and in the direction of the prevailing wind at the time of the accident. PID #1719. The Board overlooked the fact that the counties contiguous to and including Dauphin in the northeasterly direction experienced a significant increase in neonatal hypothyroid births after the accident. Molholt, ff. 19, 690, at 13. Whereas Dauphin, Lebanon, Berks, Schuylkill, Lehigh and Carbon counties had two cases in the nine months before the accident, there were eight cases in the nine months after. Id. Other sections of Pennsylvania (west of Harrisburg, the five county Philadelphia area) had comparable rates before and after the accident. Id. The Board also did not deny the doubling of infant mortality rates within a 10 mile radius of TMI in 1979 comparing six months with comparable periods in 1977 and 1978. PID #1721; Molholt, ff. 19, 690, at 13.

43. The Board made a gross error in depending on the studies which disassociated the infant deaths and hypothyroid births from the TMI-2 accident. PID #1721, 1722. The Board noted their reservations concerning the radiobiological expertise and understanding of genetics of the supporting witness. PID #1722. This witness, who as a member of the committee who studied the hypothyroid cases, was at a loss to explain why radioiodine could not have been causative on a case-by-case analysis. Tokuhata, ff. Tr. 20, 097, at 1 - 2; Tr. 20, 108 - 132 (Tokuhata).

44. The Board, therefore, concluded (#1723) based on dubious evidence (paragraph 43, supra) that there is no basis to conclude that existing protective actions are insufficient. A more appropriate conclusion was that the uncontested data left an open question concerning the adequacy of the Commonwealth's program for detecting radioiodines in the environment.

45. The infant and animal data presented by Dr. Molholt are consistent and highly suggestive of a failure of the Commonwealth's detection of I-131 following the TMI-2 accident. Molholt, ff. 19, 690, at 13, 14. See paragraphs 36 and 37 supra.

46. The Board erred in finding (#1940) that the current plans are not "sufficiently defective" to cause the Board to recommend against restart of TMI-1. The Board made this conclusion based on

deficiencies in the plans to protect livestock. Id.
Paragraphs 1 through 45 supra have shown how the deficiencies
are in regard to the plan to protect farmers. Since the health
and safety of the farmers would be adversely affected by a clearly
deficient plan, the Aamodts appeal the Board's decision for
restart of TMI-Unit 1.

Respectfully submitted,

Margaret M. Aamodt

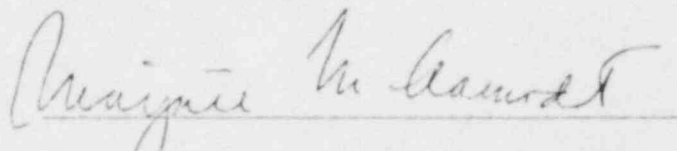
March 9, 1982

DOCKETED
UNIT
82 MAR 11 P1:25
U.S. DEPT. OF AGRICULTURE
DOCKETING & SERVICE
BRANCH

This is to certify that the following documents
were served to the parties on the attached
Service List by deposit in U. S. Mail on March 9, 1982
or where marked * by Emery Air Freight.

AAMODT BRIEF FOR APPEAL OF BOARD'S DECISION CONCERNING
INFORMATION TRANSMITTAL AND PUBLIC EDUCATION (PARTIAL
INITIAL DECISION, DECEMBER 14, 1981 EMERGENCY PLANNING
ISSUES)

AAMODT BRIEF FOR APPEAL OF BOARD'S DECISION CONCERNING
EMERGENCY PLANS FOR FARMERS


Marjorie M. Aamodt

SERVICE LIST

- *Administrative Judge Ivan W. Smith,
Chairman, Atomic Safety and Licensing
Board, U. S. Nuclear Regulatory Comm.
Washington, D. C. 20555
- Administrative Judge Linda W. Little
Atomic Safety and Licensing Board
5000 Hermitage Drive
Raleigh, North Carolina 27612
- Administrative Judge Walter H. Jordan
Atomic Safety and Licensing Board
881 West Outer Drive
Oak Ridge, Tennessee 37830
- * Gary L. Edles, Chairman
Atomic Safety and Licensing Appeal
Board, U. S. Nuclear Regulatory Comm.
Washington, D. C. 20555
- * John H. Buck
Atomic Safety and Licensing Appeal
Board U. S. Nuclear Regulatory Comm.
Washington, D. C. 20555
- * Christine N. Kohl
Atomic Safety and Licensing Appeal
Board, U. S. Nuclear Regulatory Comm.
Washington, D. C. 20555
- * Reginald L. Gotchy
Atomic Safety and Licensing Appeal
Board, U. S. Nuclear Regulatory Comm.
Washington, D. C. 20555
- * George F. Trowbridge, Esq.
Shaw, Pittman, Potts and Trowbridge
1800 M Street, N. W.
Washington, D. C. 20036
- * John F. Ahearne, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
- * Thomas M. Roberts, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
- *Office of Executive Legal
Director, U. S. Nuclear
Regulatory Commission
Washington, D. C. 20555
- * Docketing and Service Section
Office of the Secretary
U. S. Nuclear Regulatory Comm.
Washington, D. C. 20555
- Steven C. Sholly
Union of Concerned Scientists
1725 Eye St., N. W. Suite 601
Washington, D. C. 20006
- * Robert Adler, Esq.
Assistant Attorney General
505 Executive House
P. O. Box 2357
Harrisburg, Pa. 17120
- Ms. Gail Bradford
ANGRY
245 W. Philadelphia Street
York, Pa. 17404
- Jane Lee
R. D. 3, Box 3521
Etters, Pa. 17319
- Ellyn R. Weiss
Sheldon, Harmon, Roisman & Weiss
1725 I Street, N. W. Suite 506
Washington, D. C. 20006
- * Nunzio J. Palladino, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
- * Victor Gilinsky, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
- * Peter A. Bradford, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555