

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
DUKE POWER COMPANY, et al.,
(Catawba Nuclear Station,
Unites 1 & 2)

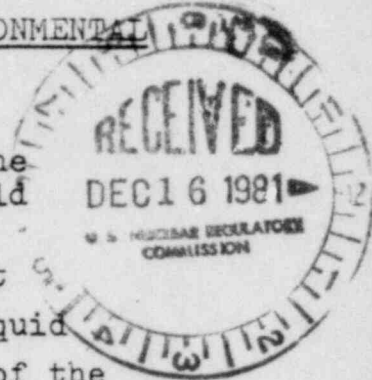
Docket Nos.

ER
81 DEC 14 P4:28
50-413
50-414

SECRETARY
& SERVICE
BRANCH

CONTENTIONS OF THE CHARLOTTE-MECKLENBURG ENVIRONMENTAL
COALITION

In accord with the Board's Order of Nov. 5, 1981 CMEC herewith amends its petition and contends that the applicant's Application for an Operating License should be denied on the following grounds:



1. The Applicant's Environmental Report (ER) does not adequately project the radioactive emissions, both liquid and gaseous, which will result from normal operation of the Catawba Nuclear Station (Catawba) in the following respects:

- (a) The projections set out in the ER are understated in that they do not reflect the fact that during the operating life of a LWR such releases will become progressively greater.
- (b) The projections set out in the ER are based on assumptions which lack proper scientific foundation in that there are wide divergences between such projections for the McGuire Nuclear Station (as shown in the ER and FES for the McGuire operating license) and Catawba (as shown in the Catawba ER), notwithstanding the fact that the Catawba reactors and the McGuire reactors are essentially similar in design.

2. The projections of radioactive emissions set out in the ER for normal operation of Catawba fail to take into account the actual accidental releases of radionuclides which have occurred at operating nuclear power plants with the United States.

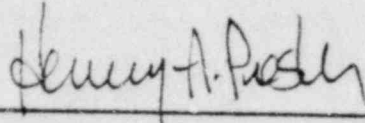
3. The Applicants' ER does not adequately project the concentrations of radionuclides which will occur in the Catawba River from normal operation of Catawba, and releases of the nature specified in Contention 2, in the following respects:

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50/11

- (a) The models and methods used in the ER underestimate the resulting concentration of radionuclides in that they project an erroneous and overly optimistic dilution effect in the discharge canal and in the lake. We contend that the only suitable and realistic model is one that, in respect to any particular radionuclide, calculates the resulting concentration by dividing the e.g. annual projected release into the total annual amount of water leaving the lake. A 'feed and bleed' model, such as that proposed in the ER, that results in a lower figure for the concentration than that yielded by our model, can only result in much higher concentration in the lake itself.
 - (b) The calculated concentrations of radionuclides in the Catawba River downstream of Catawba from liquid releases fail to take into account the cumulative impact of radionuclides released to the Catawba River from McGuire Nuclear Station during normal operation of both the McGuire and Catawba Nuclear Stations. Such cumulative impact should be taken into account in calculating concentrations of radionuclides in water drawn from the Catawba River by communities downstream from Catawba.
 - (c) The calculated concentrations of radionuclides, particularly tritium, drawn from the Catawba River upstream of Catawba into the water supply of the City of Charlotte does not take into account the fact that gaseous releases from normal operation of Catawba will be carried up to 50 miles from Catawba and will be brought back into the Catawba River watershed through rainfall.
4. The ER inadequately assesses the long-range genetic and somatic health effects of routine releases of radioactivity within applicable NRC guidelines during normal operation, and releases of the nature specified in Contention 2, of the Catawba Nuclear Station, in that it fails to take into account recent work which shows the long-term genetic and somatic health effects of such releases to be damaging to adults and extremely hazardous to the human embryo and fetus.

As part of the 'stipulation process' Petitioner has had discussions with J. M. McGarry and A. V. Carr, attorneys for Applicant. It is my understanding that, on the basis of these discussions, Applicant agrees to the above four contentions being brought before the Board by CMEC.

Submitted,



Henry A. Presler, Chairman

Charlotte-Mecklenburg Environmental
Coalition

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December 9, 1981

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AFFIRMATION OF SERVICE

I hereby affirm that copies of "Contentions of the Charlotte-Mecklenburg Environmental Coalition" in the above captioned proceeding have been served on the following in the U.S. Mail, first class, this 9th day of December 1981.

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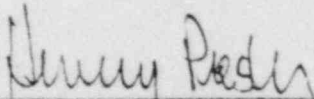
* Atomic Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
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* Atomic Safety & Licensing Appeal Panel
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