

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC
82 SEP -7 P4:26

Before the Atomic Safety and Licensing Board

OFFICE OF GENERAL
DOCKETING & SERVICE
BRANCH

In the Matter of)

CLEVELAND ELECTRIC ILLUMINATING)
COMPANY, et al.)

(Perry Nuclear Power Plant,)
Units 1 and 2))

Docket Nos. 50-440
50-441

SUNFLOWER et. al. RESPONSE TO APPLICANT'S ANSWER TO JULY 13, 1982
MOTION TO SUBMIT ADDITIONAL CONTENTION.

Although the NRC Staff has conceded reasonable specificity in Sunflower's contention, the applicant has chosen not to. Therefore answers to specific responses are submitted below.

The draft environmental statement does not contain any new information, very true, that's exactly our contention. Enough information about the health effects of low level radiation has been amassed in the years since dose level calculations have been completed in the original environmental statement to change the DES conclusions - but they have not been changed.

The dose calculations for the PNPP are not Perry specific by applicants own admission. The dose commitments do not take into account the wide range of different crops grown in the areas within 50 miles of Perry, not do they take in to account the significant portion that Perry EPZ fresh & preserved produce (vegetables, fruit, grain & meat) make up in the diet of Perry EPZ population. Many people (an increasingly larger number in these depressed economic conditions in northeast Ohio) get the majority of their food from their own gardens and local road side markets. Also totally ignored are the doses received from

harvested game (deer, rabbit, etc.) fish from Lake Erie and local rivers & streams and wild growing berries and fruits, all of which contain much higher concentrations of radionuclides than do domesticated livestock. (Methodologies for the study of Low-Level Radiation in the Midwest - Huver et.al.)

Models used are also not sub-population sensitive for age, sex & locale. Fetus, infants, children, pregnant & nursing mothers are especially sensitive to low-level emission, as much as 10 times more sensitive as a mature healthy "average" male. Doses are calculated for the "average" individual within 50 miles of PNPP - not taking into account the relatively higher fallout nearer the plant.

We cited nothing new by Stern Glass - but his conclusions have been ignored by applicant - and newer studies (Es. Savannah River Plant Study Report by Robert Alvarez) confirm his conclusions.

Sternglass's conclusions have never been scientifically, conclusively refuted, because the effects of radiation exposure are slow to develop and are very difficult to separate out from other environmental effects. There has never been a comprehensive, systematic, long-term study of health effects of low-LEVEL radiation from a nuclear reactor. The development of a sound record demands a full comprehensive public examination of all facts from all vantage points, foreign or domestic, industry or critics, new & old. Including the Savannah River Plant Study (not yet complete), which is being done under the auspices of local, state and federal officials. The study, just proposed for the same plant, by the center for disease control and the recent British Journal of Epidemiology and Community Health, June 1982 by Alice Stewart.

Page 25. Detectable by whom, and based on what instrumentation, for how long a time? Dose calculations do not include more than 1 year ingestion and deposition in human tissue of radio nuclides, doses are based on estimates -

the heart of the contention - they are not based on actual measured liquid or gaseous emissions.

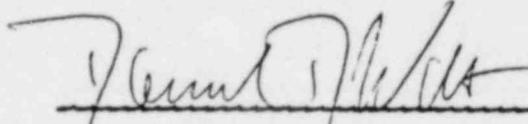
Alpha emitters are ignored by the DES. For example N-239 a beta emitter is included, N-239 half life 2.35 days decays to Pu 239, which is an alpha emitter and is not included in dose estimates.

Ground water will be contaminated by the leaching action of rain and melting snows. Anything put on top of the land, fertilizers, chemicals, etc. are eventually leached to ground water. The ground water table and Lake Erie are connected and interdependent, they are not compartmentalized. There is flow back and forth and further ground water contamination will occur from radionuclides dumped into Lake Erie from liquid effluents and gaseous effluents deposited on the surface of the lake.

The contention clearly alleged that food and nursery crops from the PNPP area will be damaged by contamination and their marketability will be damaged. As the damaging of health by low level radioactivity becomes more apparent to the general public (as it surely will) the public will increasingly resist buying such contaminated crops. The paragraphs categorically deny damage to crops - the truth remains, crops are contaminated. Doses to people who eat these crops are significant and must be studied.

No one point of Sunflower's contention deserves a public airing, in a licensing proceeding, But taken as a whole, the concerns, questions and potential for health and economic damage demand the development of a sound record. Neither does the applicant's refutation of one point as to untimeliness preclude the discussion in public.

The time delay incurred would be very small in comparison to construction time and the operational life span of the PNPP.



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S E R V I C E

A copy of this Motion has been sent to all persons on the Service List
on this 3 day of August, 1982.



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