

DESCRIPTION OF THE PETITIONER
AND HOW ITS INTERESTS WILL BE AFFECTED

Concerned Citizens of Louisa County is a not-for-profit organization comprised of approximately 70 persons who reside in the vicinity of the North Anna power plant. Citizens was established because of concern on the part of its members over threats to the safety and health of the public, and to the quality of the environment, which may be posed by the operation of the North Anna plant. Foremost among the goals of the group are to assure that the plant is operated safely, and to educate its members and the general public on matters related to the plant's safe operation.

Citizens submits that it has standing to participate in the above-captioned proceeding as a representative of its members, most if not all of which reside within 20 miles of the North Anna plant and thus satisfy the prevailing rules governing standing in NRC licensing proceedings. In particular, the following members have authorized Citizens, through counsel, to represent their interests in this matter:

* Donna M. Dellest, Rick W. Dellest, and their children - Christen, age 4, and Andy, age 1 - reside in Bumpass, Virginia, within 10 miles of the North Anna plant. In addition, the Dellests are the proprietors of a retail store in Bumpass. The Dellests' health and safety, as well as their financial

interest in the store, are threatened by VEPCO's proposal to increase the amount of nuclear waste to be stored at the North Anna plant. If authorized, VEPCO's proposal would increase the amount of radioactive discharges which routinely emanate from the plant, and create a risk of spent fuel pool accidents causing even greater harm to the Delletts.

* Collette Cole resides in Mineral, Virginia. The property on which her home is located lies adjacent to Lake Anna, into which the North Anna plant discharges thermal and radioactive effluents. Because of the risk of accidents and the chronic, long-term radioactive discharges to which VEPCO's proposal, if approved, will give rise, Ms. Cole's interest in her personal health, and in the quality of the Lake Anna area's environment, will be affected by the proposed license amendment.

* Pamela H. and Frederick S. Richardson reside, with their 6-year old son, Joel, in Mineral, Virginia. Their home lies within 10 miles of the North Anna plant. Should the Commission approve VEPCO's license amendment application, the Richardsons' property and environmental interests will be impaired because of the resultant increased levels of radioactive effluents that will be discharged by the North Anna plant.

* Gary and Theresa Schwartz reside in Louisa, Virginia, within 15 miles of the North Anna plant. Their children,

Lydia and Graham, attend the Mineral Elementary School in Mineral, which is located less than 10 miles from the North Anna plant. Should the proposed license amendment be granted, the Schwartz family's health and property interests will be impaired by the increased levels of pollution emanating from the plant, as well as the enhanced risk of an accident involving the spent fuel pool.

CONTENTIONS

Citizens makes the following specific contentions concerning (1) alternatives to VEPCO's proposed action, (2) the risk of accidents involving the North Anna spent fuel pool, and (3) the NRC's statutory obligations to evaluate the environmental implications of the proposed license amendment. Citizens intends to amend and/or supplement this list in the near future.

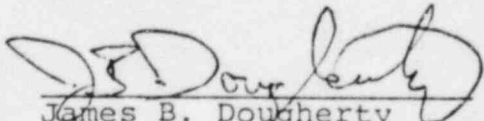
(1) Applicant has not demonstrated that the proposed modification of the spent fuel pool is environmentally and economically preferable to the construction and use of a dry cask spent fuel storage facility at the Surry Power Station.

(2) Applicant has not demonstrated that the proposed modification of the spent fuel pool is environmentally and economically preferable to increasing the capacity of the spent fuel pool at the Surry Power Station.

- (3) Applicant has not shown that the proposed modification of the spent fuel pool is environmentally and economically preferable to operating the Surry Power Station at a reduced rate of output.
- (4) Applicant has not shown that, in the event of an accident involving the spent fuel pool, the resulting radioactive releases would not be inimical to the public health and safety.
- (5) Applicant has not shown that, in the event of a "Class 9" (i.e., catastrophic) accident involving North Anna Units 1 and/or 2, the resulting radiological releases from the spent fuel pool would not be inimical to the public health and safety.
- (6) The proposed license amendment constitutes a major federal action significantly affecting the environment and thus may not be granted prior to the preparation of an environmental impact statement.

Respectfully submitted,

Dated this 22nd day
of October, 1982


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