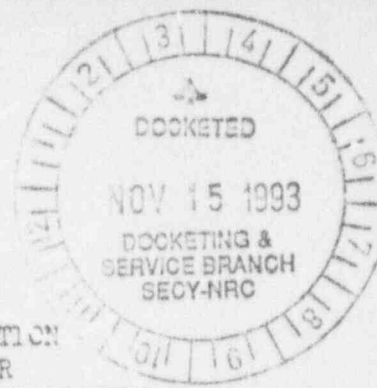


UNITED STATES OF AMERICA
BEFORE THE NUCLEAR REGULATORY COMMISSION



Ex Parte:)
Environmentalists, Inc.)
)
Petitioner,)
)
In the Matter of)
)
Yankee Atomic Electric Company)
(Decommissioning and Dismantlement of)
Yankee Rowe Nuclear Power Plant))
)
Applicant.)

PETITION
FOR
ADJUDICATORY HEARING
AND FOR
LEAVE TO INTERVENE

Environmentalists, Inc., on behalf of its members, supporters and others having interests and rights related to plans to decommission and dismantle the Yankee Rowe Nuclear Power Station, herein and hereby petitions the United States Nuclear Regulatory Commission (NRC) to hold an adjudicatory hearing in the above-referenced matter and petitions the agency for leave to intervene at said proceeding. The Petitioner states that the granting of these petitions are within the authority of the NRC, because the agency is responsible for protecting the public in relation to nuclear plants and nuclear materials, including radioactive waste projects such as the proposed decommissioning and dismantlement of the Yankee Nuclear Power Plant. In support of this Petition, the following statements are offered:

1. The NRC is mandated by the Atomic Energy Act to oversee nuclear operations, ensuring with each facility and project that the public is protected.
2. Environmentalists, Inc. was founded in 1972. The organization is engaged in research and education activities related to environmental and public health policies, including those concerned with radioactive waste and nuclear power projects, such as the decommissioning of the Yankee facility. The Petitioner

has members who live, work or travel within areas which may be adversely affected by the Applicant's dismantlement and decommissioning plans. Whether from routine operations or due to accidents, releases of radioactive waste materials into the atmosphere, water or environs would endanger the following rights and interests of the petitioner and its members:

- a. Their use of, and right to use property in close proximity to the Yankee Power Plant, travel routes over which wastes are shipped and in the vicinity of the nuclear waste landfill near Barnwell, South Carolina.
- b. Their right to be protected while travelling on trains and roads from the release of gaseous or particulate matter from radioactive waste shipments.
- c. Their right to have food and water which are free of radioactive contaminants.
- d. Their right to produce milk and other food products within the geographic areas which may become contaminated from radioactive releases.
- e. Their right to receive income from tourism and other businesses which could be impaired by the proposed activities and related outcomes.
- f. The possible effect of allowing decommissioning of the Yankee Plant now, without adequate planning would be to adversely affect the foregoing interests of the Petitioner, its members, the environment as a whole, and the health, safety and welfare of citizens in Massachusetts, South Carolina and places along the highways over which waste travel.

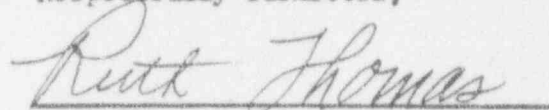
3. Reserving its right to amend this document prior to the close of the evidentiary hearing in order to set forth before the presiding Safety and Licensing Board of the NRC any issue with respect to environmental protection which reasonably comes to its attention after the Commission has made available reports which provide the evidence necessary for knowing what is the best option for

managing the radioactively contaminated power plant of the applicant. The Petitioner sets forth the following contentions for consideration in this proceeding:

1. The Nuclear Regulatory Commission (NRC) has failed to fulfill its regulatory oversight by not requiring the applicant to prepare adequate reports related to the environmental impact and public health impact of dismantlement and decommissioning operations which the utility has chosen.
2. The NRC has failed to require that the applicant carry out the 10CFR regulations.
3. The NRC has failed to provide adequate opportunities for public participation and has not given adequate attention to the questions raised and the requests made by public-interest organizations.
4. The NRC and the Applicant have failed to provide adequate information regarding the waste stream associated with the dismantlement plan and in terms of all the non-fuel radioactive wastes.
5. Both the NRC and the Applicant are taking a piece-meal approach to plans for closing down the Yankee Reactor, rather than assessing the total impact of the decommissioning project.
6. Safety and environmental issues related to dismantlement, transportation, and burial of wastes have not been adequately researched and presented in the plans. For example, the NRC and the Applicant have failed to present adequate information regarding the radioactive particulate problems associated with the various operations to be used during decommissioning nor have disposal issues concerned with long-lived radioactive materials being buried at the Barnwell site received the necessary attention, although it is known that the toxic life of the reactor waste far exceeds the time it would take for the migration of buried nuclear materials to reach the nearest water source.

In addition to petitioning for an Adjudicatory Hearing and for leave to intervene at such a proceeding, Environmentalists, Inc. requests that all dismantlement and decommissioning operations at the Yankee Rowe Nuclear Power Station be halted and that all shipments of radioactive waste to the Barnwell Nuclear waste Landfill of Waste Management, Inc. be stopped.

Respectfully submitted,

A handwritten signature in cursive script that reads "Ruth Thomas". The signature is written in dark ink and is positioned above a horizontal line.

Ruth Thomas, President
Environmentalists, Inc.
1339 Sinkler Road
Columbia, South Carolina 29206

Tel. 803-782-3000

November 12, 1993