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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )  
ARMED FORCES RADIOBIOLOGY )  
RESEARCH INSTITUTE )  
(Cobalt-60 Storage Facility) )  
Docket No. 30-6931  
Renewal of Byproducts  
Material License No.  
19-08330-03

SUPPLEMENT TO PETITION  
FOR LEAVE TO INTERVENE

The Citizens for Nuclear Reactor Safety, Inc.,  
Intervenor in the above-captioned matter, hereby supplements  
its Petition for Leave to Intervene in said matter pursuant  
to 10 C.F.R. §2.714(b) and the Decision and Order of the  
Atomic Safety and Licensing Appeal Board dated July-16, 1982  
(ALAB-682). Intervenor's identity and interests in this  
proceeding have been previously identified in its Petition for  
Leave to Intervene filed August 29, 1981, and the same are  
incorporated by reference and made a part hereof.

Contentions

Following are the specific aspects of the subject  
matter which Intervenor seeks to litigate.

Security

1. Licensee has not adequately addressed the possibility  
and consequences of terrorist diversion of radioactive material  
from the cobalt storage room and AFRRI facility. Licensee  
possesses in accessible form one of the largest inventories of

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radioactive Cobalt-60 in the United States and has a history of unauthorized entries into and exits from the building which houses the cobalt. Licensee has failed to demonstrate that terrorist diversion of its cobalt could be prevented or that the public health and safety could be adequately protected in the event of a successful terrorist attempt.

2. Licensee has not adequately addressed the possibility and consequences of sabotage of the cobalt storage facility. Licensee has failed to demonstrate that terrorist activities could not precipitate:

- (a) a rupture of the cobalt storage tank;
- (b) a pumping defect or failure;
- (c) a break in the feeder line;
- (d) an explosion;
- (e) a combination of these types of problems.

Licensee has not demonstrated that the public health and safety could be adequately protected in the event of such terrorist acts.

#### Accidents

1. Licensee has not adequately demonstrated that there could not be a recurrence and escalation, with adverse impacts on the public health and safety, of the accident which began in its cobalt storage room on April 22, 1981 and continued unmitigated until May 16, 1981, during which time radioactive cobalt remained continuously exposed above the shielding water.

2. Licensee has failed to adequately address the possibility and consequences of other accident scenarios at the

cobalt facility that would pose a significant hazard to the health and safety of the surrounding community and environment. Such scenarios would include but would not be limited to a loss-of-shielding accident, caused by a pumping defect or failure, break in the shielding water tank feeder line, or rupture of the shielding tank itself, in turn caused by an explosion in the contiguous TRIGA reactor facility or shock waves from sources external to the APFRI complex such as a Metro tunnel explosion or natural gas pipeline rupture.

#### Emergency Planning

Licensee has failed to demonstrate that its emergency response capabilities and those of the surrounding Bethesda community would be adequate to protect the public health and safety in the event that one or more of the acts of terrorism or accidents described above occurred. Given the near identity in operating personnel, location, security procedures, safety systems, emergency and evacuation plans of Licensee's cobalt facility and TRIGA reactor, Licensee has not adequately demonstrated that the deficiencies inherent in the reactor's Emergency Plan, which Intervenor has identified with particularity in the TRIGA licensing renewal proceeding (Docket No. 50-170), are not also present in Licensee's Emergency Plan for its cobalt facility.

#### Siting

Licensee has not adequately demonstrated that the site of its cobalt storage facility, with its exceedingly large inven-

tory of radioactive material, vulnerability to acts of terrorism, and demonstrated susceptibility to accidents, in the midst of a densely populated residential/urban area and in close proximity to numerous schools, hospitals and nursing homes, less than five miles from the nation's capital, does not constitute a significant hazard to the public health and safety.

#### National Environmental Policy Act

Neither Licensee nor the Nuclear Regulatory Commission Staff has prepared a legally adequate environmental cost-benefit analysis of the action to renew the cobalt material license which, inter alia, considers alternatives to relicensing and balances the need for the license against the environmental hazards associated with its possession and use.

#### Conclusion

Intervenor submits that the Contentions set forth above establish that neither the Licensee nor the NRC Staff has provided reasonable assurance that the renewal of Licensee's Byproducts Materials License No. 19-08330-03 is not inimical to the public health, safety and environment. Intervenor therefore respectfully requests that the Atomic Safety and Licensing Board designated to preside over the consolidated dockets of this proceeding and the AFRRI TRIGA Reactor pro-

ceeding admit the aforesaid contentions as litigable matters  
in said consolidated proceedings.

Respectfully submitted,

Elizabeth B. Entwisle

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Counsel for Intervenor

Dated at Pittsburgh, Pennsylvania  
this 5th day of January, 1983.

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	)	Material License No.
	)	19-08330-03

CERTIFICATE OF SERVICE

I hereby certify that the SUPPLEMENT TO PETITION FOR LEAVE TO INTERVENE in the above-captioned matter was served on the following by deposit in the United States Mail, First Class, this 6th day of January, 1983:

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