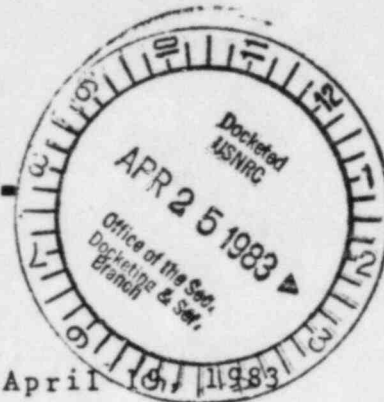


VALLEY WATCH, Inc.
P.O. Box 2262 Evansville, IN 47714 812-464-5663



NUMBER
PROD. & UTIL FAC.

50-546/547

April 1983

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing and Service Branch

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To The Secretary -

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President
Valley Watch, Inc.

This letter is to notify you that Valley Watch, Inc.:

- A) petitions the Commission for status as an intervenor in the request for an Operator's License by Public Service Company of Indiana and the Wabash Valley Power Association for the Marble Hill Nuclear Generating Station, Units One and Two, being built under construction permits Nos CPPR-170 and CPPR-171, and,
- B) requests that a public hearing be held regarding this same matter.

Valley Watch is a non-profit corporation formed to preserve the environmental quality of the Ohio River valley. Our organization has standing in this case because most of our members live in cities and towns along the Ohio River, many of them in the Madison-Louisville stretch near the proposed site. Another large segment of our membership reside in Evansville.

Valley Watch members have interests at stake in this proceeding due to their proximity to the site, and the resultant potential impacts of such a facility:

on the healthful quality of their drinking water, most of which comes directly or indirectly from the Ohio River itself;

on the quality of their lives, living under the shadow of a possible evacuation, and devaluation of property in the event of a mishap;

on the health of themselves and their families, in the event of a rapid sequence of events precluding an orderly and timely evacuation.

Also, many Valley Watch members are rate-payers of the public utilities involved in this action. They are therefore economically affected by the proposal, and have no other mechanism to affect the decision by the companies to proceed with operation of this costly and unnecessary facility.

Valley Watch is concerned about a variety of issues related to this licensing procedure.

A. Issues concerning the technical qualification of the applicants to engage in the proposed activities:

Are the companies requesting the license capable and willing to provide the technical expertise required to safely operate a facility of such complexity and to strictly follow the detailed operational safety regulations? PSI is one of the smallest utilities in the country to attempt to operate a nuclear power plant. The history of the construction of the Marble Hill plant, including two construction halts in safety related areas, demonstrates a lack of quality assurance capability casting serious doubts on the ability of PSI's management to meet the stringent NRC standards required for minimum safety.

When sited for violations of quality assurance requirements, PSI has repeatedly publicly refused to recognize the importance of following such procedures, stating that the problems were merely those of "paperwork". We feel that the danger to the public of operation without strict adherence to safety regulations are too great to grant a license to a company with such a poor track record.

B. Issues concerning health and safety aspects of operation of Marble Hill:

Valley Watch questions the security of the Marble Hill facility. A lackluster quality assurance program which allowed the major construction flaws mentioned above is very likely to have allowed other serious safety-related flaws. We are not convinced that the testing of the concrete of the containment vessel at the site was adequate to insure that additional significant bubbles are not present to weaken the structure. For these reasons, we feel that operation of the plant would be inimical to the health and safety of the population living within 100 miles of the plant.

The operation of the Marble Hill facility would significantly endanger the water supply of the substantial population downstream which depends on the Ohio River as its sole source for this essential substance. Incidents similar to those which have occurred at other nuclear plants could cause a considerable economic loss to communities along the river. A more severe accident could cause long-term damage to this crucial source of drinking water, as well as contamination of the groundwater supplies fed by the river. For these reasons, we feel that operation of the facility would be inimical to the health and safety of the population living on the Ohio River within 150 miles downstream of the plant.

Valley Watch contends that an Operator's License should not be granted until a thorough plan exists for ultimate disposal of the dangerous wastes which will be generated by the facility. At this point in time, no licensed facility for the disposal of high-level radioactive wastes exists,

or is reasonably close to completion. Until our society decides that it is willing to accept the risks involved in disposal of such long-lived and highly toxic wastes, no further wastes should be allowed to be generated. No geologic scheme has been proposed which has been widely accepted by the scientific community as adequate for long-term isolation of the wastes from the environment. For these reasons, we feel that operation of the facility would be inimical to the health and safety to the populations which will in the future reside near whatever ultimate disposal site is chosen for the wastes.

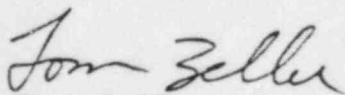
Valley Watch further contends that an Operator's License should not be granted until a detailed plan exists for decommissioning of the facility. No commercial-scale reactor has ever been decommissioned, and no scheme has been put forth which has been widely accepted by the scientific community as practical and adequate to isolate the long-lived and highly toxic radioactive species which will inextricably reside in the plant structure. For these reasons, we feel that the operation of the facility would be inimical to the health and safety of the population living in the area of the plant, for generations to come.

C. Other issues:

Valley Watch has examined the Environmental Report prepared by the applicant, and have found it to be wholly inadequate. In several areas concerning important ecological impacts, unsupported statements are made that expected impacts would be insignificant. Thorough and unbiased analysis are lacking in areas concerning the amount of radiation expected to be released into the environment. Valley Watch calls for a serious attempt to determine the degree of the ecological effects of worst-case release of radioactivity into the plant's environs.

Valley Watch contends that there is not now, nor will there be for more than a decade, sufficient electricity demand in the area served by the applicants to justify the operation of this facility. This issue was raised repeatedly during the hearings on the Construction Permit, and the public was repeatedly told that the issue could be raised again during the Operator's License procedures. In the meantime, in spite of national controversy, the NRC regulations were changed to disallow this topic from consideration at this stage. Thus the public has been cheated of its chance to examine the proposed benefits of a facility which presents such potentially extreme effects. We feel that the cost/benefit ratio in the case of this plant is unacceptable, because without demand for the power produced by the plant, there are no benefits to be derived from its operation. An unnecessary threat to public health and safety and the environment should not be allowed.

Sincerely,


Tom Zeller,
Vice-President