



UNITED STATES  
 NUCLEAR REGULATORY COMMISSION  
 WASHINGTON, D. C. 20555

February 4, 1985

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In the Matter of  
 Commonwealth Edison Company  
 (Braidwood Nuclear Power Station, Units 1 and 2)  
 Docket Nos. 50-456 and 50-457

Gentlemen:

I am following up on my telephone call to you concerning the request by Judge Marshall Miller that the status report due February 15, 1985 include a list containing the wording of all admitted and pending contentions indicating any proposed changes. Enclosed please find a list of what I believe to be the contentions admitted and pending in the Braidwood proceeding with proposed changes noted as such.

Please review the list to be certain that it reflects the wording of the contentions and call me to confirm your agreement or to make corrections. I will include the finalized list in the NRC Staff's status report to the Board.

Thank you for your cooperation.

Sincerely,

*Elaine I. Chan*

Elaine I. Chan  
 Counsel for NRC Staff  
 (301) 492-7148

Enclosure: As stated

cc w/encl.: Service List

BRAIDWOOD NUCLEAR POWER STATION, UNITS 1 AND 2  
DOCKET NOS. 50-456 and 50-457

Bridget Little Rorem and Appleseed

Admitted: August 23, 1979 Special Prehearing Conference Transcript

Contention 1 - Transcript at 10

Intervenor contends that an adequate emergency plan for the Braidwood Station should include the following:

- a) a program for informing the public within 25 miles of the Station of the means for obtaining instructions for evacuation or other protective measures in the event of a radiological emergency originating at the Station.
- b) assurance that institutions within 25 miles of the Station, such as the federal prison in Joliet, hospitals and nursing homes, can be evacuated or adequately protected in the event of a radiological emergency.
- c) a suitable plan for providing medical treatment to operating personnel who might be exposed to radiation in the event of an accident, including transportation to medical facilities equipped to treat radiation casualties.

Contention 2 - Transcript at 10

Intervenors contend that Applicant is not qualified to operate the Braidwood Station because:

- a) its personnel do not have adequate technical qualifications.
- b) there is a shortage of technically qualified personnel which will be aggravated when Braidwood Station and other nuclear units now under construction come on line.
- c) Applicant's management has not demonstrated a sufficient commitment to the safe operation of nuclear power plants as is evidenced by the NRC fines and the consistent "C" rating on its Zion and Dresden plants.

from Bridget Little Rorem, August 7, 1979 Amended Petition

Bob Neiner Farms, Inc.

Admitted: August 23, 1979 Special Prehearing Conference Transcript

Contention 1 - Transcript at 25, 26

Intervenors contend that the 765 Kv transmission lines that will be used to transport the electrical output from the Braidwood Station create an unacceptable, hazardous and dangerous condition to persons living or working on a daily basis within 600 feet from the closest line, and that the 765 Kv transmission lines should not be placed closer than 600 feet from any structure or area in which people can be expected to be present six or more hours per day. The hazardous and dangerous conditions include: audible noise impairing hearing, increasing tension, interfering with sleep, interfering with speech; interference with the operation of cardiac pacemakers; biological effects on humans because of exposure to electric fields excluding the use of nearby areas for working, living or recreation, and the danger of shock to persons and animals.

The basis for this contention is that Commonwealth Edison testified before the Illinois Commerce Commission that as of March 3, 1978, approximately 60% of all transmission right-of-way acquisitions included right-of-way for 345 Kv and 765 Kv transmission lines. Opinion No. 78-13, involving Case No. 26529, issued by the Public Service Commission of New York discusses the hazards associated with 765 Kv lines.

Contention 3 - Transcript at 31

Intervenors contend there are inadequate emergency plans for the Braidwood Station in case of a radiological emergency and that such plans should include the following:

- a) a program for educating and informing the public within 25\* miles of the Station of the response they should take and also of the means for obtaining instructions for evacuation or other protective measures in the event of a radiological emergency originating at the Station.
- b) a specific plan for notifying people residing within 25\* miles or using recreational facilities within ten miles of the Station of the existence of a radiological emergency.
- c) assurance that institutions within 25\* miles of the Station, such as the federal prison in Joliet, hospitals and nursing homes, can be evacuated or adequately protected in the event of a radiological emergency.

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\* Contention was amended in August 23, 1979 Special Prehearing Conference. Tr. at 31 (change 20 miles to 25 miles).

Contention 5 - Transcript at 37

Intervenors contend that in order to detect unacceptable contamination to groundwater supplies resulting from seepage from the cooling lake, Applicant must establish a monitoring program which specifies the number and location of offsite monitoring points and the frequency of sampling at each point.

Contention 6 - Transcript at 37

Intervenors contend that since the Illinois River will be cumulatively affected by chemical and radiological discharges from the Braidwood, Collins and Dresden power stations, that the existing environmental impact studies are inadequate to show that an unacceptable impact on aquatic biota and fishing will not be created.

Contention 7 - Transcript at 38

Within ten miles of Braidwood Station there are public and private recreational facilities with a total annual attendance of 1,053,873 persons (Table 2.2-7 ER-LOS)

Intervenors contend that the potential that these facilities would have to be closed, either temporarily or permanently, due to the release of substantial quantities of radioactive materials during an accident creates an unacceptable environmental impact.

Contention 10 - Transcript at 40

Intervenors contend that prior to the operation of the Braidwood Station, Applicant should present data showing the expected radiation exposure to individuals and livestock from radioactive releases from the LaSalle and Dresden Stations, as well as the Braidwood Station, in order that the cumulative total dose to individuals and livestock can be assessed.

Contention 11 - Transcript at 40

Intervenors contend that the dike surrounding the Braidwood Station cooling lake is subject to failure due to rain liquification of the calcareous material from which the dike is constructed. In the event of a failure of the dike, the water remaining in the ultimate heat sink basin might not be adequate to cool the reactor from full power operation or to allow safe shutdown in the event of an accident.

Pending:

Contention 4 - Transcript at 36, 37

Intervenors contend that the proximity of the Illinois Central Railroad to the plant site and the use of the rail system to transport explosive materials from the Joliet, Illinois arsenal and other plants or depositories creates an unacceptably hazardous condition not considered by the Atomic Safety and Licensing Board, which issued the partial initial decision on environmental and site suitability matters for the Braidwood Station (LBP-75-1, 8 AEC 1197 (January, 1975)). At the construction permit stage the analysis of the probability of an explosion was inadequate in that:

- a) the six-month period during 1974 for which the traffic from the Joliet arsenal was analyzed is not representative of other traffic periods in the past and may not be representative of the traffic to be expected in the future.
- b) the analysis of the traffic was based on peacetime traffic only.
- c) only the probability of accidental or inadvertent explosions were assessed and the probability of sabotage or purposefully caused explosions were not explored.

Contention 8 - Transcript at 39

Intervenors contend that for purposes of determining compliance with 10 C.F.R. Part 100.11(a)(3), Applicant and the NRC Staff should have used the population expected to be at the nearby (within eight miles) recreational facilities in aggregate as a population center. (Table 2.2-7 ER-LOS)

from Bob Neiner Farms, Inc., August 7, 1979 Supplemental and Amended Contentions