



DOCKET NUMBER 50-254,265
PROD. & UTIL. FAC.

May 28, 1981

Dear Sir or Madam,

I write on behalf of the Quad-City Alliance for Safe Energy and Survival and in doing so, I hereby move to intervene with respect to the request to the Nuclear Regulatory Commission by the Commonwealth Edison Company for modification to the spent fuel storage pool at the Quad-Cities Nuclear Generating Station Unit Nos. 1&2 located in Cordova, Illinois.

I request that a hearing be granted concerning this proposal so other interested individuals and organizations can participate.

The following are contentions and other said interests concerning Commonwealth Edison Company's request.

1) The storage of additional radioactive spent fuel at the Quad-Cities site may create a hazard to the citizens in both the state of Iowa and Illinois.

2) The information submitted by the Licensee (Commonwealth Edison) in support of its request is inadequate for there is no indication on the effects of long term storage of large amounts of spent fuel.

3) The Licensee has made no showing that it will be financially capable of meeting the costs of eventual disposal of the spent fuel wastes which it intends to store in the expanded spent fuel pool.

4) The request by the Licensee fails to discuss neither the continued integrity of the spent fuel rods during long term storage in the pool nor possible increased radioactive releases from loss of rod integrity, which may create difficulties in moving and shipping the rods from the site after a prolonged storage period.

5) The request does not give sufficient data to fully assess the durability and performance of the Boral stainless steel rods which form the spent fuel storage racks in the following examples:

- A. Corrosion rate of the racks.
- B. Effect of the water chemistry on the Boral within the racks.

6) The severe consequences due to an earthquake, which some earthquake scientists at the St Louis University and the Midwest Research Institute feel that the Mississippi valley is ripe for a major earthquake. If one were to occur and cause a considerable amount of damage, the release of radioactive material would have detrimental effects not only to the state of Illinois but

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to other states as well.

7) The Licensee has failed to discuss monitoring procedures adequately.

8) The proposed expanded fuel storage configuration does not positively preclude the possibility of criticality in the spent fuel pool.

9) The Licensee has failed to discuss potential occupational hazard from exposure to increased radiation emanating from defective fuel store in the pool.

10) The Licensee has failed to include anti-sabotage and security plans, so that there is no assurance that adequate protection has been developed.

11) The Licensee has also failed to include a final environmental impact statement.

12) The evaluation of additional radiological impacts offsite due to the proposed expansion of the spent fuel pool is inadequate.

As these contentions are in part based upon documents which may be superseded, modified, or supplemented before or during a hearing on this matter, I request to respectfully reserve the right to modify, amend, add or delete contentions.

Thank you,
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