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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of)
)
SEQUOYAH FUELS CORPORATION)
)
)

Document No. 40-8027 **MLA**
(50 Fed Reg. 153 (1985))

PETITION FOR LEAVE TO INTERVENE

Introduction

By application dated January 24, 1985, Sequoyah Fuels Corporation (SFC), a wholly owned subsidiary of Kerr-McGee Corporation applied for an amendment to its source material license (No. SUB-1010). The application seeks authorization to add facilities to its existing Sequoyah plant in Gore, Oklahoma. The application would allow it to convert depleted uranium hexafluoride to depleted uranium tetrafluoride for use in weapons.

Notice of Opportunity for Hearing was published in the Federal Register. In pursuant to 10 CFR 2.1049(a)(7) and 10 CFR 2.714, the Muskogee County Client Council submits this petition to intervene.

Description of Petitioner

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The Muskogee County Client Council is a affiliate of the Oklahoma Client Council which is a statewide nonprofit corporation chartered under the laws of the State of Oklahoma. The Muskogee County Client Council (MCCC) is a citizen's organization which is composed of

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low-income people seeking more knowledge about the legal system and their rights as citizens. The MCCC has represented its members in various hearings dealing with the effects of coal mining and other environmental issues including nuclear power.

Interest and Standing of the Petitioner

The interest of the MCCC are largely in part predicated on the interest of its members. The members of MCCC are residences of Muskogee County, and the county is located near the Gore plant. Individual members live, work, and visit recreational areas within a (75) mile radius of the plant. Residents would be directly affected by pollution of the land, water, and air by the facility. Food-stuffing grown and produced in the vicinity of the plant are or will be transported to Kerr-McGee owned farms operating within Muskogee County.

How Petitioners Interests May Be Affected

Muskogee County Client Council represents a cross-section of taxpayers of Muskogee County and is opposed to the application as an unwarranted risk on the "health and safety of the public"-particularly those citizens in the eastern part of Muskogee County.

In the Atomic Energy Act, Sec. 2(e) and 3(d) the stated purpose of the NRC is that the allowed atomic energy development be consistent with the "health and safety of the public." The act further states the need for regulating nuclear materials with the goal of

"protect(ing) the health and safety of the public."

We, as a public, are concerned about the effects of the application in that said approval would increase danger to the health and safety of the public through increase pollution of the Arkansas River, irreversible damage to drinking water and damage to the health and property of area residents in eastern parts of Muskogee County.

Futhermore, the possibility of an additional burden on the underground injection system already constructed at the plant would put additional unwanted waste in the environment thereby causing health condition in residents of Muskogee County.

The interest of the party wherein mention in the petition are affected in that the corporation making said application owns property in Muskogee County and such property is used in connection with the activities at the existing Sequoyah plant.

Specific Aspects of the Subject Matter

Muskogee County Client Council, if granted leave to intervene in this proceeding, will file contentions on the following aspects:

1. that the site for application is not appropriate because of the large number of torandoes, and the potential threat to life and property given the enhanced possibility of damages caused by a torando and damages to the site's nuclear materials during a torando.

2. that no reasonable assurances exist by Kerr-McCee with respect to increase safety measures taken if application approved.

3. that no reasonable assurances exist with respect to the

applicant maintaining reasonable care as to preventing release of radioactive materials into the environment.

4. that Kerr-McGee's disposal system for waster is dangerously inadequate and application would increase dangerous disposal system.

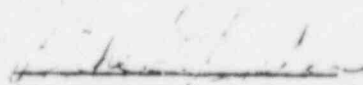
5. that the location of major drinking water sources make the site unsuitable for nuclear processing.

6. that approval of application would bring increase danger of contaminating the soil and water below the ground and such contaminating is difficult, if not impossible to track.

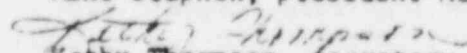
Conclusion

Muskogee County Client Council having duly shown and established standing under the Atomic Energy Act, and having fulfilled the requirements of 10 CFR 2.174, Prays for an Order granting this petition for leave to intervene.

Respectfully submitted,



Mike Stephen, president MCCC


Kathy Thompson, secretary

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