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To those whom it may concern:

In response to the letter of Mr. Sheldon J. Wolfe Esq., Chairman Atomic Safety and Licensing Board re special prehearing conference Nov. 17, 1978 to identify key issues of the HL&P request for license for Allens Creek Nuclear Generating Station Unit 1, I will not pretend to a legal competence that I do not have, nor to special circumstances that difference me from my neighbors if a license were to be granted to HL&P to construct and operate The Allens Creek Station. Rather, if there will be risks or penalties from operations of the Allen's Creek plant I will share them. And because of that, some of us must be permitted to intervene, to raise question and subject the HL&P license application to the searching examination needed to reduce the possibility of dangerous error in judgment or oversight to the vanishing point.

1) Typical operation of a 1000 MW(e) Light water reactor produces radioactive volatiles $^{3}H$, $^{85}Kr$, $^{129}I$ from the fission process or due to neutron irradiation of the heat exchange medium. Dilution and atmospheric venting through tall stacks to bring the radioactive volatiles that escape the containment vessel below acceptable upper bounds may not be appropriate for Allens Creek because of local atmospheric temperature inversions and sudden tropical rainstorms. Provisions for the control and release of radioactive materials both during routine operations and in the event of an operational incident at Allens Creek ought to be a key issue.

2) Operation of a 1000 MW(e) nuclear generating plant involves the replacement of 25 to 30 metric tons of fuel per year and the removal of a like amount of nuclear wastes. These wastes are extremely radioactive and it has been the practice to store them for a minimum of 150 days at the reactor site

while the short lived radioactivity decays. The provisions that HL&P has planned for the short term storage of these spent fuel elements, their containment, their security and the control of their radioactive emissions represent a key issue.

3) On-site storage of spent fuel elements is only a temporary experiment. Significant radioactive components of the nuclear wastes have half life decay times that range from years ($^{3}H$ 11 years) to millenia ($^{239}Pu$ 24000 years) and must be isolated from the biosphere accordingly. In December 1975 it may have appeared that there would be commercial enterprises that would dispose of these radioactive wastes. Such enterprises may have been Nuclear Fuel Services Inc in West Valley, N.Y., General Electric in Morris, Ill. or Allied - General Nuclear Services in Barnwell S.C. It has become abundantly clear, however, that since December 1975 none of these facilities, nor any other in the United States is disposing, nor has disposed commercially wastes from the operations of a nuclear plant such as the one proposed for Allens Creek. Industrial enterprises must be able to dispose of their wastes in a manner which presents no hazards to the community at large. Surely no less should be expected from a utility that wishes to operate a nuclear reactor. Provisions for radioactive waste disposal must be a key issue in this licensing application.

4) The protection and safety of the people who live near the transportation routes used during the delivery of the 25 to 30 metric tons of nuclear fuel to the Allen's Creek plant each year and the removal of the 30 tons of highly dangerous radioactive wastes is a key issue that ought to be addressed in the licensing hearing.

5) Experience gained since 1975 from the operation of other 1000 MW(e) nuclear generating plants, for example the Consolidated Edison of New York Indian Point I plant,

points up the importance of having available adequate supply of qualified technical personnel to cope with emergencies. In the case of Indian Point I, repair operations had to be temporarily suspended when all of the nuclear qualified welders available to ConEd NY received their maximum permissable radiation doses. A key issue is whether or not HL & P will have a sufficient pool of trained manpower available to cope with emergencies at Allen's Creek.

6) Although the Gulf Coast does not represent an earthquake-prone area, it is an area of active geological faulting. Frequently the surface expression of a subsurface fault is a water course or creek bed. Hence it becomes of the most serious consequence to learn whether or not HL & P have undertaken an intensive and thorough search for subsurface faults in the region of the proposed Allen's Creek nuclear plant. Such a search should include, but not be limited to, high resolution seismic profiling and the interpretation of such profiles by competent geophysicists. The possibility of subsurface geological faulting and the consequences of such faulting to the integrity of the Allen's Creek nuclear facility ought to be a key issue.

7) Provisions for final decommissioning and decontamination of the Allen's Creek site at the end of its useful life is a key issue and one which was ignored completely in the responses by Mr. J. Gregory Copeland and Mr. Robert H. Culp, attorneys for HL & P. Yet a recent reference (Bulletin of the Atomic Scientists, October 1978 p32 et seq) pointed out that during the decommissioning of a very small reactor (Nuclear Division Martin Marietta PM-1 1.8 MW(e)) 12200 tons of contaminated soil had to be removed and disposed of. One should not dare embark upon a nuclear course

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without seeing clearly all of the consequences to the end of the journey.

I respectfully submit these contentions for your consideration.

Respectfully
Emanuel Bastir