

United States Nuclear Regulatory Commission

BEFORE THE ATOMIC SAFETY AND LICENSE BOARD NRC PUBLIC DOCUMENT ROOM

In the Matter of Houston Lighting and Power Company) Docket No. 50-466
(Allens Creek, Unit 1)ROBERT S FRAMSON's ContentionsTHIS DOCUMENT CONTAINS
POOR QUALITY PAGES

1. The proposed Allens Creek Plant is planned to be located at a site that will have an environmental impact on a presently dense-populated area. This location is in an area that is about the fastest growing area in the nation, both in numbers and in geographical dimensions. Applicant should be denied permit for construction until demographic studies are made for a time frame during the life of the plant to its demise in 30 years. Since the plant and its environs will still be radioactive after its dysfunction, studies should be made on its environmental impact into perpetuity, and demographic studies should be made for a time frame after the initial 30 year period and thereafter, ad infinitum, of this population that will be burdened with this environmental impact.
2. Construction permit should be denied until studies are made for the routes to be used for radioactive materials in the complete nuclear cycle from delivery of fuel rods to the plant to the removal and transport of radioactive wastes from the plant. License should be denied until the public is informed of these routes and is allowed adequate time to intervene at hearings, as to the transport of radioactive materials and wastes to and from the plant, on the total spectrum of its environmental impact.
3. Environmental impact studies, including planned radiation emissions and unplanned radiation emissions in an accident, during transport of radioactive materials and wastes in the complete nuclear cycle relating to the Allens Creek Plant on these proposed routes should be made. My family will be subject to this environmental impact and radiation emissions since our residence is located a close proximity to the 610 Loop and many other main freeways and thoroughfares. Robert S. Framson's job, which requires 50% travel, includes travel in the complete radius of Houston and Harris County, and also into Fort Bend, Wharton, Austin, Brazoria, Colorado and Waller Counties.
4. An average nuclear reactor can turn out as much as 32 tons of radioactive spent fuel a year. DOE Assistant Secretary John O'Leary and Dr. Ralph Lapp, utilities consultant, indicate that there will be at least ten year on site storage of high level radioactive wastes which makes the Allens Creek Nuclear Generating Station essentially a Nuclear Waste Repository for at least ten years and perhaps, in perpetuity, since the problems of radioactive wastes are insoluble. Permit should be denied until studies are made of the radioactive emissions from the steady increments of radioactive wastes stored on site. This increased storage time would necessarily increase hazards to the public's health and safety. A substantial increase in the amount of radioactive waste at the plant site could force the plant to curtail operation or shut down altogether in order to cease the generation of wastes. The environmental, health and safety issues are germane to the interim and ultimate storage of radioactive wastes not only to this generation but to future generations.
5. This increment of radioactive wastes, which will include weapons-grade plutonium for bombs, stored on plant site creates a serious security risk and makes this area vulnerable to theft, violence and nuclear terrorism. These acts of nuclear terrorism could trigger an accident of catastrophic proportions releasing excessive amounts of radiation, with resultant destructive effects to the public and the environment.
6. Drs. John Gofman and Arthur Tamplin, world renown nuclear physicist and medical physicists, both formerly connected with the Atomic Energy Commission, in their many years of research of effects of low level radiation indicate that there is no known "safe" level of radiation. Also confirming their research are studies by distinguished scientists in this country and abroad, recently revealed in spite of attempted suppression by certain govern-

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ment agencies. These studies indicate that government standards for safe levels of radiation are flawed and erroneous. Drs. Karl Z. Morgan, former director of health physics at the Oak Ridge, Tenn. Nuclear Facility for 30 years, Irwin Bross, Director of Biostatistics, Roswell Park Cancer Institute, Thomas F. Mancuso, University of Pittsburgh, research scientist under ERDA grant, Alice Stewart, internationally regarded epidemiologist, Birmingham Univ., England and her associate, George Kneale, biostatistician, are just some of the scientists whose research data reflects that levels of radiation exposure that have been considered safe by the government are actually dangerous. These so-called government standards have caused cancer and the implications are far reaching in effecting not only nuclear workers but the population-at-large. Dr. Mancusos stated, "...the risk for the industrial population is 10 times greater than was estimated before. Therefore, the standards should be reduced by 10 times, become 10 times more stringent, and consequently, the general population which is exposed to a fraction of what the industrial population is, will have to be reduced accordingly." Construction permit should be denied until non-government, independent investigators study and revise radiation limits for atomic workers and the general public.

6. The population-at-large should not be lumped into one stereotypical individual, with equal susceptibility to radiation. Radiation has a cumulative factor. Particular health, disease, age, pregnancies, genetics are just some of the factors effecting individuals' susceptibility to radiation. It is already medically known that the young, who make up the majority of the population, and pregnant women are predisposed to radiation. Our family is also one with high susceptibility to radiation.

Madeline Bass Framson has pernicious anemia, complete deficiency of hydrochloric acid and serious hypothyroidism. Her physicians are Chiefs of their Departments, in research and teaching, at the Baylor College of Medicine, Houston, Texas. These physicians, as well as medical journals and textbooks indicate that these medical conditions make Mrs. Framson one of the highest cancer-prone risks. These doctors have advised Mrs. Framson that if cancer occurred it would be "environmentally triggered".

Robert S. Framson has serious colon and prostate conditions and is also considered a high cancer-prone patient. Both Mr. and Mrs. Framson will have to be examined periodically for the rest of their lives for cancer - several times a year.

My family's interest is not protected with the proposed Allens Creek Plant and its environmental impact and I feel we represent the vast numbers in the general population with various medical problems, conditions and ages that are highly susceptible to radiation. To license this plant is to state that a large segment of the population is expendable. Construction permit should be denied.

7. The building of Allens Creek Nuclear Plant will not only increase the danger to health and safety, but will also cause decreased civil liberties. This is because of the extensive protective safeguards required to protect against sabotage and terrorism. Suppose someone reported that a portable rocket capable of breaching the containment was in the area of the plant, do you suppose that the police would wait to get a search warrant before conducting house to house searches at all homes close enough to hit the containment with the rocket. The Barton Report of Oct. 31, 1975 was prepared under contract of the NRC, and it gives a detailed discussion of the problem. The EIS has not considered this environmental impact and so is incomplete.

8. The safety analysis has failed to consider the danger from insulator failures in containment electrical penetrations. During October and November 1977, the Millstone plant had several failures due to the epoxy insulator intrusion into cable splices that led to high resistance heating that caused short circuits between conductors that were to have been isolated. At Allens Creek, this can cause electrically operated valves to be in the incorrect position (as open when supposed to be closed), and failure of alarms to operate properly which can endanger the public health and welfare.

9. The EIS and Safety Evaluation of Allens Creek is defective because they used the WASH 1400 Reactor Safety Study results as the basis of expected safety as the plant. Yet, several recent studies have all indicated that the report is wrong in its calculation of the probabilities of various accidents at the plant. It failed to account for the interaction of various failure mechanisms that are not independent events as assumed. It failed to account for the mistakes and fears of ordinary human beings that operate plants such as Allens Creek. The report did not consider that a worker might use a candle to set the Browns Ferry fire that almost caused two core melts. It claimed that no spacemen would burn up on the ground while sitting in the space ship, yet 4 men have already done so. Until the data is convincing to the insurance industry such that they will insure all losses then the Allens Creek plant should not be built.

10. The present plan for decommissioning Allens Creek is inadequate because it does not insure that the applicant will be able to properly decommission the plant or pay for it if some way was available to do it safely. Before building the plant and spending over one billion dollars in construction costs, the applicant should post bonds held in escrow to insure that the money will be available to properly decommission the plant. Both the GAO and the Congress have recently issued reports on this problem.

11. About 31 million acres of U.S. farmlands have disappeared in the last decade, according to EPA. That's an area half the size of the State of Wyoming. The diminishing supply of food for our nations with its rapid growing population has serious implications for its economy, stability and security. In a world-wide context, it's a peace/war factor. The EPA intends to limit this adverse impact. The Allens Creek Plant should not be constructed as it is obviously contributing an adverse impact in destroying over 5000 acres of rich food-producing farmland, a diminishing natural resource.

12. A large number of environmental and safety problems are associated with the BWR, Mark IIT containment, Emergency Core Cooling System, automatic Protection systems, etc. to be used in the Allens Creek Plant, but I must stop now to get this photocopied and mailed before deadline, although I have studied and prepared almost full time for the 5 days since being told that contentions would have to be submitted by Nov. 2nd. I again wish to register my objections to the arbitrary unfair acceleration of schedule not giving petitioners adequate time for proper preparation of contentions. If I am given sufficient time as allowed by my constitutional right of "real" due process, I will submit more contentions and elaborate more on the above.

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