### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

### ATOMIC SAFETY AND LICENSING BOARD PANEL

## Before Administrative Judge

### Charles Bechhoefer

In the Matter of	
COMBUSTION ENGINEERING, INC.	Docket No. 70.36-MLA
(Hematite Fuel Fabrication ) Facility, Special Nuclear	ASLBP No. 89-593-01-MLA
Materials License No. SNM-33 )	September 5, 1989

# SUPPLEMENTAL INFORMATION TO REQUEST OF KAREN SISK

By order dated August 18, 1989, Administrative Law Judge Charles Bechhoefer granted Karen Sisk the opportunity to file supplementary information by September 5, 1989, on her request for a hearing in the above-styled cause regarding the following:

Whether Karen Sisk wishes to intervene personally or through membership in the Coalition for the Environment and whether her interests may indeed be plausibly affected by the concerns she set forth in her request for a hearing dated June 22, 1989:

With respect to the request for a hearing on the proposed amendment of the materials license of the Combustion Engineering uranium fuel fabrication plant in Hematite, Jefferson County, Missouri, please be advised that I am seeking participation in this proceeding both as an individual (as a resident of Jefferson

County) and as a member of the Coalition for the Environment. I joined the Coalition in August 1989 after receipt of your Memorandum and Order.

Our home, which we live in and own, is located approximately eleven miles, as the crow flies, from the plant. In addition we own undeveloped property at the Raintree Plantation approximately eight miles from the plant.

I believe our health and safety could be affected by the release of contaminated material into the atmosphere as the result of an accident at the plant or on a Jefferson County road during the transport of materials to or from the plant. I also believe such an accident would affect the value of our two Jefferson County properties. I have additional concerns about the potential impact on our health and safety of the increased levels of gaseous and particulate materials which would be released into our airshed from the plant stacks during the plant's routine operation as the result of the proposed expansion.

I am also concerned about the potential release to the environment of the radioactive materials present in approximately forty unmarked burial pits at the plant site. Recognizing that some of the materials processed at the Hematite plant will remain radioactive and hazardous for generations into the future, I believe the buried materials should be located, identified, exhumed and properly disposed of, preferably before final decisions are made on the proposed expansion of plant operations. (Uranium-238, for example, the predominant material processed at the Hematite facility, will continue releasing alpha particles and decaying into

a range of radioactive daughter products for at least ten times its half-life, that is, ten times four and a half billion years.)

If the Coalition for the Environment is admitted as a party to this proceeding, I would like the Coalition to serve as the lead intervenor in representing my interests.

I attended the informational public meeting conducted by Nuclear Regulatory Commission staff members on August 24, and I orally raised some questions at that time. Although interesting information about the proposed amendment was provided at the meeting, I continue to believe that the concerns stated in our June 22 petition are warranted. In fact, I now have two additional concerns not mentioned in our petition which were generated by comments and questions raised by citizens in the audience -namely, the potential health effects of the routine and accidental release of a large amount of fluorides to the environment, and the plausibility of an accident from the continuing use of outmoded equipment for the processing of uranium hexafluoride. This latter concern was subsequently heightened when I learned through the media last week that the licensee had discovered on August 29, on the basis of surprisingly high levels of radioactivity on crushedlimestone scrubbers, that there had been a recent unplanned release of an unmeasured amount of uranium powder to the environment. According to the St. Louis Post-Dispatch, September 1, 1989, the most recent estimated volume of the accidental release reported to have been about 274 grams, as compared with the estimated planned release during daily routine operations of about one-half gram.

I hope this document provides the requisite supplemental information as requested in the Memorandum and Order of August 18, 1989. If any other information is necessary, I will be happy to furnish it upon request.

Respectfully submitted,

Karen Sisk
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Imperial, Missouri 63052