RAS 3427

BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE

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September 14, 2001

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary of the Commission
Rule Making and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Docket Nos. 50-369, 50-370, 50-413, and 50-414

Dear Commissioners:

On behalf of the Board of Directors of the Blue Ridge Environmental Defense League, Inc. (BREDL), and pursuant to Atomic Energy Act, the National Environmental Policy Act, and 10CFR2, 10CFR51, 10CFR54. 10 CFR 2.1203 (a) 10 CFR 2.1203 (e), and 10 CFR 2.714, I hereby submit this written Request for Hearing by the Nuclear Regulatory Commission and a Petition for Leave to Intervene in the matter of the renewal of licenses for Duke Energy Corporation (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

This Petition sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the Nuclear Regulatory Commission's decision on the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE.

This Petition further explains the why intervention should be permitted with reference to (1) our rights under the ACT to be made party to the proceeding, (2) the nature and extent of our property, financial, and other interests in the proceeding, and (3) the possible effect of any order which may be entered in the proceeding on said interests, as required in 10 CFR 2.714. This petition also identifies the specific aspects of the subject matter of the proceeding in which we wish to intervene.

Scope of Proceeding and Right to Intervene

BREDL's right to intervene and request a hearing is defined in the Atomic Energy Act, the National Environmental Policy Act, and 10CFR2, 10CFR51, and 10CFR54.

First, the scope of the matters which may be taken into consideration in these proceedings [as defined in 10 CFR Parts 54 and 51] include all safety-related systems, structures, and components which are relied upon to remain functional during and following design-basis events [as defined in 10 CFR 50.49 (b)(1)] to ensure the following functions: (1) The integrity of the reactor coolant pressure boundary, (2) The capability to shut down the reactor and maintain it in a

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safe shutdown condition, or (3) The capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposure comparable to the 10 CFR Part 100 guidelines.

Second, the scope includes all non-safety related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions of the safety related systems, structures, and components. Finally, the scope includes all systems, structures, and components relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations for fire protection [10 CFR 50.48], environmental qualification [10 CFR 50.49], pressurized thermal shock [10 CFR 50.61], anticipated transients without scram [10 CFR 50.62], and station blackout [10 CFR 50.63].

Third, the scope includes provisions of the National Environmental Policy Act (NEPA) in this case including the purpose and need for the proposed action, a review of no-action and other alternatives, and analyses of the affected environment, environmental consequences and mitigating actions.

Nature and Extent of Interests

In October 1999 NRC granted DUKE an exemption to the requirement in 10 CFR 54.17 that an application for a renewed license may not be submitted to the Commission earlier than 20 years before the expiration of the operating license currently in effect.

On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072]. The NRC exemption allowed DUKE to submit an early license application for three of four units at McGUIRE and CATAWBA.[1]

BREDL has an interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

1. Membership and Operations in Vicinity of McGUIRE and CATAWBA

BREDL and its members in the Charlotte-Rock Hill area have substantial interests which are put at risk by the operation of aging reactors at McGUIRE and CATAWBA. BREDL operates an office in downtown Charlotte, 17 miles from McGUIRE and 20 miles from CATAWBA, and we have staff personnel, volunteers, and members with homes in the Charlotte and Rock Hill areas within 20 miles of the two plants. Within the scope of this proceeding, DUKE is required to

[1] McGuire 2: 3/3/23 expiration date would prohibit a license application earlier than 3/23/03
Catawba 1: 12/6/24 expiration date would prohibit a license application earlier than 12/6/04
Catawba 2 : 2/24/26 expiration date would prohibit a license application earlier than 2/24/06

analyze impacts of the plants inside a 50 mile radius.

An accident in the Charlotte/Rock Hill metropolitan area would have a negative impact on our members' ability to work, play, obtain access to the high quality health care, and to live a normal life. It would place us in a permanently contaminated landscape. Minor accidents with higher probabilities could lead to similar health and safety problems, and will negatively impact property values.

Also, normal operations may have impacts significantly larger than the NRC acknowledges. The future effects of routine operations of nuclear power plants cannot be encompassed by reference to regulatory compliance in the past because regulations are subject to change. In other words, the fact that compliance exists today does not mean compliance is assured 10 or 20 years from now. For example, future scientific findings could lead to more stringent radioactive exposure standards. Therefore the renewal cannot rely solely upon compliance with existing laws

2. Exclusion Areas, Low-population Zones, and Population Centers

In its evaluation of its McGUIRE and CATAWBA sites, DUKE was required to derive an exclusion area, a low population zone and population center distance for each reactor [10 CFR 100.11]. It its analysis DUKE was to assume a fission product release from the core with an expected leak rate from the containment structure and the meteorological conditions pertinent to the plant site. The fission product release assumed for these calculations was to be based upon a major accident resulting in substantial meltdown of the core with subsequent release of large quantities of fission products.

The exclusion area was to be determined so that an individual located at any point on its boundary for two hours immediately following onset of fission product release would receive a total radiation dose up to 25 rem or a total radiation dose to the thyroid from iodine exposure up to 300 rem [as defined in 10 CFR 100.11]. The 25 rem whole body dose and the 300 rem thyroid dose were set for the purpose of evaluation of reactor sites with respect to potential reactor accidents.

Similarly, the low population zone was to be determined so that an individual located at any point on its outer boundary who is exposed to the radioactive cloud resulting from a fission product release during the entire period of its passage would receive a total radiation dose up to 25 rem or a total radiation dose to the thyroid from iodine up to 300 rem. [10 CFR 100.11]

Finally, a population center distance of at least one and one-third times the distance from the reactor to the outer boundary of the low population zone was to be determined, based on population distribution, not political boundaries. The regulations state that for plants located near large cities, greater distances may be necessary because of total integrated population dose considerations. [10 CFR 100.11]

The code of federal regulations defines the low population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: "A low

population zone means the area immediately surrounding the exclusion area which contains residents, the total number and density of which are such that there is a reasonable probability that appropriate protective measures could be taken on their behalf in the event of a serious accident. . Whether a specific number of people can, for example, be evacuated from a specific area, or instructed to take shelter, on a timely basis will depend on many factors such as location, number and size of highways, scope and extent of advanced planning, and actual distribution of residents within the area." [10 CFR 100.3]

Since McGUIRE and CATAWBA opened in the 1980's, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. In fact, DUKE admits in its Environmental Report that the area within a 20 mile radius is a high population zone according to GEIS criteria, as defined by NRC. We expect this development to continue into the forseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA.

If granted leave to intervene in NRC's re-licensing proceedings, BREDL expects to provide information which would otherwise not be offered and which would protect the property, financial, health, and other interests of our members.

For sites with multiple reactors in which an accident in one reactor could affect the safety of operation at another, the size of the exclusion areas, low population zones and population center distances were to be based upon the assumption that all interconnected reactors emitted their fission products simultaneously. [10 CFR 100.11]

Under 10 CFR 51, DUKE must assess the future growth in the region and the impact of McGUIRE and CATAWBA on vehicular traffic in 2021-2046, the years covered by the license renewal: "All applicants shall assess the impact of highway traffic generated by the proposed project on the level of service of local highways during periods of license renewal refurbishment activities and during the term of the renewed license." [10 CFR 51.53 (J)] (emphasis added)

The possible effect of any decision in this process would influence the consequences of a major nuclear accident during plant operations, during transportation, or in the irradiated fuel storage area. Exposure to dangerous levels of radioactivity causes cancer, induces chronic health problems, or provokes other maladies. An accident would also reduce property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel—instead of the Low Enriched Uranium (LEU) fuel now in use—plutonium aerosol contamination at either CATAWBA or McGUIRE would have an even greater negative effect on public health.

3. Reactor Accident Containment Failures and Ice Condenser Issues

Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the Nuclear Regulatory Commission's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA.

The NRC's PPRs completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection, corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance.

Ice condensers must work during a reactor emergency-as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems.

The functional integrity of a containment structure is necessary to mitigate or prevent the release of radioactive materials in the event of severe postulated accidents involving the loss of reactor coolant. Ice Condenser systems are incorporated into some Westinghouse pressurized water reactor containment building designs including McGUIRE and CATAWBA. Ice condensers maintain large banks of borated ice stored in baskets. They are constructed so that steam released during an accident will be directed through the borated ice where it is cooled and condensed. The sole function of this system is to remove heat in the containment building during a postulated accident. This serves to reduce pressure on the containment building walls. Ice condensers absorb energy and allow smaller physical containment structures to contain accidental radioactive releases from the reactors. The design pressure is about 60 pounds per square inch.

The ice is located behind a number of doors designed to open when the pressure in containment reaches a certain level above the pressure inside in the ice condenser area. In July 1997, McGuire plant employees determined that 10 of the 48 ice condenser inlet doors in lower containment were incapable of opening with less force than specified in the plant's technical specifications and may not have opened in an accident situation.

On October 1, 1997 the NRC held a predecisional enforcement conference with DUKE to discuss apparent violations of NRC regulations involving ice condenser doors at McGUIRE. The apparent violations involved the company's failure to ensure that ice condenser inlet doors on Unit 2 would be able to open if needed and a failure to perform adequate corrective actions based on industry experience and operational events at McGuire.

Plant systems, structures, and components are within the scope of power plant license renewal. The ice condenser is a safety related system which is relied upon to prevent or mitigate the consequences of accidents that could result in offsite exposure above 10 CFR 100 guidelines. The aging of the ice condenser system coupled with poor maintenance reduces the safety margin.

The two recent NRC Performance summaries included below indicate that DUKE's ability to assure that plant systems, structures, and components as required under 10 CFR 54.4 continues to be questionable:

McGuire 1
Initiating Events
March 17, 2001
Identified By: Licensee
Item Type: NCV Non-Cited Violation
Inadequate Corrective Actions for Recurring Problems with Shutdown Operations Involving Loss of Letdown and/or Inadvertent Reactor Coolant System Cooldown Transients
Inadequate corrective actions (10CFR50, Appendix B, Criterion XVI) for recurring problems with shutdown operations involving loss of letdown and/or inadvertent reactor coolant (NC) system cooldown transients. During a Unit 1 shutdown from Mode 2 to Mode 3 on March 9, 2001, NC system temperature went below minimum temperature for criticality due to overfeed of steam generators. This event occurred because of ineffective corrective actions to address procedural deficiencies and/or equipment problems complicating plant cooldown. This is captured in the licensee's corrective action program under PIP M-01-0986. This finding was determined to have very low safety significance and is being treated as a Non Cited Violation (Section 4OA7). Inspection Report# : 2000007(pdf)

McGuire 1
Mitigating Systems
December 15, 2000
Identified By: NRC
Item Type: FIN Finding
Depth and effectiveness of the licensee's evaluation and corrective actions for failures of the standby shutdown facility (SSF) diesel generator.
A finding was identified associated with the depth and effectiveness of the licensee's evaluation and corrective actions for failures of the standby shutdown facility (SSF) diesel generator. The licensee's corrective actions for recent SSF-related problems have not been commensurate with the risk significance of the system. A recent Problem Investigation Process report, which documented a jacket water coolant leak and subsequent emptying of the engine's radiator, was not screened to include a root cause evaluation. The licensee did not perform comprehensive corrective actions to evaluate the need for performing additional preventive maintenance on the SSF diesel generator components. The inspectors identified vendor-recommended maintenance practices that were not being implemented and service bulletins authored by the vendor that were not included in the associated controlled vendor manual located on site. This issue was determined to have very low safety significance because it was not directly linked to any specific period of unavailability for the SSF diesel generator. This instance of ineffective corrective action was an isolated example and is not considered indicative of the licensee's overall corrective action program. (Section 4OA2b). Inspection Report# : 2000010(pdf)

Also, Dr. Edwin Edwin S. Lyman, PhD, Scientific Director at Nuclear Control Institute, says that a recent analysis released by NRC raises questions about the ability of ice condenser systems to maintain public safety in the event of postulated accidents at CATAWBA and McGUIRE. Dr. Lyman states, "This new NRC study has found that pressurized-water reactors (PWRs) with 'ice condenser' containments, a category that includes Catawba and McGuire, are 'substantially more sensitive to early containment failure' than other types of PWR containments. This means that in

the event of a severe accident in which the reactor fuel melts, the risk that the reactor containment will rupture and large releases of radioactive materials into the environment will occur is significantly greater at Catawba and McGuire than at PWRs with other types of containment." [Plutonium Fuel and Ice Condenser Reactors: A Dangerous Combination, Edwin S. Lyman, PhD, NCI, October 19, 2000]

A less technical assessment of the ice condenser containment issue was offered by Mr. Dana Powers, Member of the NRC's Advisory Committee on Nuclear Safeguards at its February 2, 2001 Meeting. This is a excerpt from the transcript:

> Mr. Powers: "I just wonder if ICE condensers had some peculiarity about them that I didn't know about other than vulnerable containment."
> (Laughter)
> Mr. Kress: "You were reading my mind."
> Mr. Powers: "I saw you grinning over there."

The nature and extent of our interests in this matter relate to the ability of DUKE to assure a continued margin of safety protection to BREDL staff and members and the general public during extended operations at McGUIRE and CATAWBA beyond the current operating permits' expiration dates of 2021-2026. With regard to safety related systems, if granted leave to intervene we would provide information and expert testimony which shows that the ice condenser systems cannot be relied upon to prevent or mitigate the consequences of accidents beyond the current license expiration dates.

4. General Aging Issues.

Under 10 CFR 54.29 Standards for issuance of a renewed license, one condition for a renewed license includes the provision that:

> "(a) Actions have been identified and have been or will be taken with respect to the matters identified in Paragraphs (a)(1) and (a)(2) of this section, such that there is reasonable assurance that the activities authorized by the renewed license will continue to be conducted in accordance with the CLB, and that any changes made to the plant's CLB in order to comply with this paragraph are in accord with the Act and the Commission's regulations. These matters are:
> (1) managing the effects of aging during the period of extended operation on the functionality of structures and components that have been identified to require review under §§54.21(a)(1); and
> (2) time-limited aging analyses that have been identified to require review under §§54.21(c)."

BREDL has an interest in pursuing aging issues for reasons that include:

a. Neutron bombardment resulting from the fission reaction degrades the metal parts of the reactor and the metal becomes brittle. Reactor embrittlement increases with age. An embrittled

reactor may look unchanged, but it will not perform as well under extreme conditions. In the event of a drop in the level of reactor coolant, the heated water is replaced by cold water from outside the reactor. This cold water can cause the embrittled metal part to fail and a minor reactor failure becomes a major one. Embrittlement of reactor parts is a well-known phenomenon and has caused premature closing of commercial power reactors.

b. The impacts of aging on key mechanical and electrical parts as well as all other aging issues are required to be analyzed under this process by NRC rules and guidance, and reflected in the applicant's Attachment B: Aging Management Programs and Activities.

5. Mixed Oxide Plutonium-Uranium Fuel

DUKE is a partner in the limited liability company of Duke Cogema Stone and Webster (DCS), which is under contract with the Department of Energy to perform plutonium/MOX fuel fabrication and irradiation services. The terms of its existing contract include requirements for the applicant to 1) design modifications to CATAWBA and McGUIRE, 2) license the modifications, 3) amend its license to use plutonium/MOX fuel, and 4) qualify plutonium/MOX fuel for use in CATAWBA and McGUIRE.

Under 10 CFR 51.53.c.(2), at the operating license renewal stage the applicant must submit an environmental report containing "a description of the proposed action, including the applicant's plans to modify the facility or its administrative control procedures as described in accordance with §§54.21 of this chapter. This report must describe in detail the modifications directly affecting the environment or affecting plant effluents that affect the environment"

DUKE wrongly dismisses the requirement (specified in 10 CFR 51.53) to analyze its plans to modify the facility for the use of plutonium/MOX fuel during the license renewal process, stating on Page 4 of its June 13 renewal application that "One potential future change to the current licensing basis involves the use of mixed oxide (MOX) fuel at McGuire and Catawba...Duke is planning to submit, later this year, a license amendment request related to the use of MOX fuel."

With regard to DUKE's proposed testing in 2003 of plutonium fuel (MOX) lead test assemblies at McGUIRE and CATAWBA, Dr. Lyman demonstrates that the testing of a new fuel type at reactors using the ice condenser containment system raises un-reviewed safety questions which would disallow NRC from proceeding without additional analysis of this matter.

The proposed use of plutonium/MOX fuel in Duke Power nuclear reactors will result in storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Both CATAWBA and McGUIRE will be *de facto* plutonium storage sites for the Department of Energy, making these plants more vulnerable to acts of sabotage or terrorist acts. Further, The use of plutonium/MOX fuel significantly increases the consequences of a major nuclear accident that would harm interests of BREDL and its members.

The use of plutonium/MOX fuel would exacerbate the effects of aging and reduce the ability of DUKE to maintain safe operations. NRC cannot assure the safe operation of these plants.

DUKE's approach to licensing directly violates the basic tenets of NEPA, which mandates an analysis that is comprehensive and not piecemeal. DUKE's action circumvents discussion and scrutiny related to reactor refurbishment. Further, it is a violation of the spirit and letter of the concept of Integrated Safety Management to which the NRC claims to adhere. At the least, it is an inefficient use of government resources and an unnecessary burden on the public to keep plutonium/MOX fuel use separate from license renewal. The use of plutonium/MOX fuel must be addressed in this proceeding.

6. Alternative Sources of Energy.

The NRC defines the purpose and need of license renewals as " to provide an option that allows for power generation capability beyond the term of a current nuclear power plant operating license to meet future system generating needs, as such needs may be determined by State, utility, and, where authorized, Federal (other than NRC) decision makers."

Under 10 CFR 51.71, "the NRC Supplemental environmental impact statements prepared at the license renewal stage pursuant to §§51.95(c) need not discuss the economic or technical benefits and costs of either the proposed action or alternatives except insofar as such benefits and costs are either essential for a determination regarding the inclusion of an alternative in the range of alternatives considered or relevant to mitigation."

However, DUKE, which justified its propose action with the NRC generic statement of purpose and need, did discuss economic and technical benefits in its Environmental Report:

"Current Duke planning strategies have established that combined cycle units (482 MW(e)) and conventional fossil units (600 MW(e)) are the only current viable supply side base load technologies. Duke believes that the 482 MW(e) combined cycle technology is the most economically attractive base load technology. However, for purposes of this review of alternatives to the proposed action, conventional coal-fired, oil and gas-fired combined cycle, gas-fired only combined cycle, and advanced light water nuclear reactor are considered to be currently available base load technologies that would be considered to replace Catawba's generation upon the termination of operation."

BREDL and its members have a long tern and significant interest in future energy supplies. The Atomic Safety and Licensing Board identifies its responsibility to "continue the national debate over the role that nuclear power should play in meeting the nation's energy needs." With regard to alternative sources of energy, BREDL has interests that will be presented at the contention stage.

7. Regulatory Compliance

Under 10CFR51.71(c), the "draft environmental impact statement will list all Federal permits, licenses, approvals, and other entitlements which must be obtained in implementing the proposed action and will describe the status of compliance with those requirements. If it is uncertain

whether a Federal permit, license, approval, or other entitlement is necessary, the draft environmental impact statement will so indicate."

BREDL has a clear interest in addressing compliance issues for the simple reason that public health and our environment are not protected sufficiently if basic laws and regulations are violated. Some of these issues may include Category 1 issues that will be discussed in future contentions, including waste disposal and wastewater discharges.

8. Irradiated Fuel Storage.

Although 10 CFR 54 states that "the environmental report need not discuss any aspect of the storage of spent fuel for the facility within the scope of the generic determination in §§51.23(a) and in accordance with §§51.23(b)," DUKE has stated that capacity for irradiated (spent) fuel is insufficient for the existing license period, and that: "Duke plans to add an independent spent fuel storage installation (ISFSI) at Catawba in order to expand the storage capacity. Plans for implementation of ISFSI are presently in the early stages of development."

The capacity for storing irradiated fuel at CATAWBA and McGUIRE is limited, and precludes an extension of operations without an associated increase in storage space. There is still no national repository for irradiated fuel storage. Without a long-term, permanent storage facility or repository for irradiated nuclear fuel, an additional 20 years of reactor operations will greatly increase storage of irradiated fuel in this area, posing increased risks of accidents.

BREDL interests are affected by irradiated fuel storage and are within the scope of this process for many of the same reasons cited for incorporating plutonium/MOX fuel into the process; i.e. that piecemeal analysis is a regulatory burden upon the public, an inefficient use of federal resources, and violates the spirit of NEPA.

9. Terrorist Acts

NRC's design basis threat (DBT) is woefully optimistic and inadequate. Therefore the threat of a major radiological sabotage and release must be within the scope of these proceedings.

A recent NRC letter reveals how hopelessly outdated the DBT is. In his June 15, 2001 letter to Vice President Cheney concerning the NRC's role in combating terrorism, Chairman Meserve states, "The NRC also imposes obligations to prevent or control a terrorist incident. The NRC requires that power reactors and certain sensitive fuel facilities have the capacity to defend against a Design Basis Threat (DBT). We assume for this purpose that the adversaries will consist of several well-trained and dedicated individuals with knowledge of the facility and possessing weapons (up to and including automatic weapons) and specialized equipment, such as incapacitating agents and explosives. See 10 C.F.R. § 73.1(a)."

BREDL and its members in the Charlotte-Rock Hill area have substantial interests which are put at risk by terrorist activity at or near nuclear power stations. Since 1995 Blue Ridge

Environmental Defense League has repeatedly requested that the US Department of Energy and the NRC conduct an intensive re-evaluation of the potential adverse impacts from acts of domestic or foreign terrorism. Our requests have been met with inadequate studies, unrealistic scenarios, and near disregard. Once again, we petition the NRC to conduct realistic assessments of terrorism impacts with regard to power plant operations and related activities. If allowed to intervene, BREDL will present information which may not otherwise be included in license renewal proceedings for McGUIRE and CATAWBA.

Please communicate with me in regard to all aspects of this proceeding.

Respectfully submitted,

Janet Marsh Zeller

Janet Marsh Zeller, Executive Director
Blue Ridge Environmental Defense League
PO Box 88
Glendale Springs, NC 28629
(336) 982-2691
BREDL@skybest.com

cc: NRC Office of the General Counsel
cc: Michael S, Tuckerman

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001
Attention: Rulemakings and Adjudications Staff

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 12, 2001

Affidavit of Catherine Mitchell

Comes now Catherine Mitchell who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 5101 Markay St., Matthews, N.C., County of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

. I live approximately 22.5 miles from CATAWBA reactors and 21.8 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary

feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Catherine M Mitchell 9/14/01

signature date

Edna Ann Grant 9/14/01

notary date

My Commission Expires 2/11/06

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 205557?0001, Attention:
Rulemakings and Adjudications Staff

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

Date: 9-13-2001

Affidavit of James R. Henley

Comes now James R. Henley who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 5704 Shangrila Lane in Fort Lawn city
county Chester state South Carolina

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 26 miles from CATAWBA and 59 miles from McGUIRE.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded

greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

James R. Hendley 9-13-2001

signature
date

Jayne H Kirk Commission Expires 07-25-2007

notary
date

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555?0001, Attention:
Rulemakings and Adjudications Staff

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

Date: 9-13-01

Affidavit of Robin H Henley

Comes now Robin H Henley who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 5704 Shangri La in Ft Lawn city
county Chester state South Carolina

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 26 miles from CATAWBA and 59 miles from McGUIRE.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded

greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Robert H Henley

signature
date 9-13-01

Janice C. Hammond

notary
date Expires 4-12-09

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD
Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff
Docket Nos. 50-369, 50-370, 50-413, and 50-414
In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2
September ~~14~~, 2001 Sep. 13 ASW
Affidavit of ANNE S. WHITE
Comes now ANNE S WHITE who deposes and states as follows:
1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].
2. I reside at 203 Lorimer Road in Davidson
city
Mecklenburg County, N.C.
county state
I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.
3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].
4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:
a. I live approximately 40 ~~miles~~ from CATAWBA nuclear reactors and 8 miles from McGUIRE nuclear reactors.
b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.
c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.
d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I ~~or my family~~ will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.
e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March

1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident. ASW

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

signature date Anne S. White 9/13/01

Christie Bradley 9/13/01
comm exp 7/20/03

CHRISTIN BRADLEY NOTARY PUBLIC MECKLENBURG COUNTY, N.C.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of Penny Kuhn

Comes now Penny Kuhn who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 6315 Rosecrest Dr. in Charlotte, North Carolina, county of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 9 miles from CATAWBA reactors and 19 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be

affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

9-11-01

signature date

JANET J. MALONE 9/11/01

notary date

JANET J. MALONE NOTARY PUBLIC UNION CO. N.C.

EXPIRES 2-5-2006
UNION CO. N.C.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of Susan Bulloch

Comes now Susan Bulloch who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 5328 Farmbrook Dr. in Charlotte, North Carolina, county of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

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4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 10 miles from CATAWBA reactors and 18 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

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affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

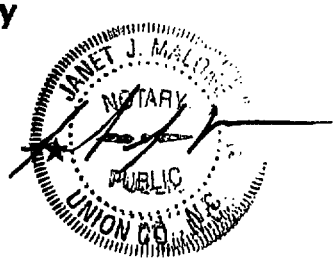
g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Sue Ballard 9-11-01

signature date

JANET J. MALONE 9/11/01

notary date



EXPIRES 2-5-2006
UNION Co. N.C.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of Nina Layton

Comes now Nina Layton who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 5328 Farmbrook Dr. in Charlotte, North Carolina, county of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 10 miles from CATAWBA reactors and 18 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be

affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Nina Layton 9/1/2001

signature date

Janet J. Malone 9/11/01

notary date

JANET J. MALONE NOTARY PUBLIC UNION CO. N.C.

Expires 2/5/2006
Union Co. N.C.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of Joan Harrell

Comes now Joan Harrell who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 3000 Somerset Dr. in Charlotte, North Carolina, county of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 11 miles from CATAWBA reactors and 17 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be

affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

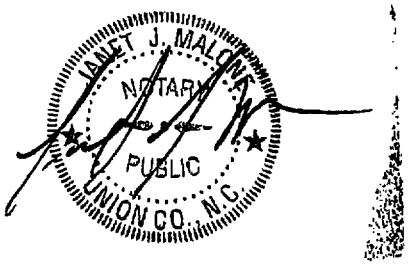
g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Joan Ellen Hamell 9-11-01

signature date

Janet J. Malone 9/11/01

notary date



Expires 2/5/2006
Union Co N.C

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of Elizabeth Ann Wicker

Comes now Elizabeth Ann Wicker who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 1027 Park West Dr. in Charlotte, North Carolina, county of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 11 miles from CATAWBA reactors and 17 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be

affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Elizabeth A. Wicker 13 Sept 2001

signature date

9/13/01

notary date

OFFICIAL SEAL
Notary Public, North Carolina
JEFFREY LEE MILLER
Mecklenburg County, N.C.
My Commission Expires December 6, 2004

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001
Attention: Rulemakings and Adjudications Staff

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 12, 2001

Affidavit of George L. Mitchell

Comes now George L. Mitchell who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 5101 Markay St., Matthews, N.C., County of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

. I live approximately 22.5 miles from CATAWBA reactors and 21.8 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary

feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

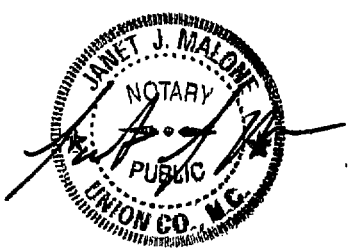
g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

[signature] 9/11/01

signature date

JANET J. MALONE 9/11/01

notary date



EXPIRES 2-5-2006
UNION CO. N.C.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 12, 2001

Affidavit of Crystal Elizabeth Carmack

Comes now Crystal Elizabeth Carmack who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 13001 Maple Springs Drive, Charlotte,
street address city
North Carolina Mecklenberg
state county

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 3 miles from CATAWBA reactors and 27 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

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e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary

feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Elizabeth Compton September 12, 2001

signature date

Lisa M. Mims 9/12/2001

notary date

North Carolina
Mecklenburg County
My Commission Expires
July 3, 2006

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 12, 2001

Affidavit of NANCY JOCOY

Comes now NANCY JOCOY who
deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 1232 Plum Branch Ln in Fort Mill city
York county SC state 29715 zip code

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 10 miles from CATAWBA and 30 miles from McGUIRE.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on

Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

_____ signature 091201 ~~09/12-01~~ 09/12/01 date

_____ notary 9-12-01 date

My Commission Expires May 26, 2005

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 11, 2001

Affidavit of Gregg Jocoy

Comes now Gregg Jocoy who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 1232 Plum Branch Lane in Fort Mill city York county South Carolina state 29715 zip code

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 10 miles from CATAWBA and 30 miles from McGUIRE.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on

Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

_____ signature 9-11-2001 date

_____ notary 9-11-01 date

My Commission Expires May 26, 2005

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001
Attention: Rulemakings and Adjudications Staff

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 12, 2001

Affidavit of Phyllis St. Clair

Comes now Phyllis St. Clair who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 5360 Smokerise Hill, Charlotte N.C., County of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

. I live approximately 16 miles from CATAWBA reactors and 24 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater

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. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the harlotte/Rock Hill metropolitan area for a variety of services such as transportation and nedical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and njoyment of numerous cultural and educational activities in the Charlotte area. I have ignificant personal interests in this matter which may be affected by the results of the urrent proceedings, including but not limited to, continued access to employment, nedical services, and/or recreational facilities following a reactor accident.

j. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly ncreases the risk of a major nuclear accident that would harm myself, my family, my roperty, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in)uke Power nuclear reactors will result in the interim or even long-term storage of rradiated MOX fuel with substantially higher plutonium content than existing irradiated uel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this natter which may be affected by the results of the current proceedings including but not imited, to the determination of health effects from a postulated accident, unreliability of ervice due to accelerated aging of the reactor, and whether the NRC will permit the use of olutonium/MOX fuel.

Phyllis St Clair Sept 14, 2001

signature date

Edna Ann Gant 9/14/01

notary Commission expires 2/11/06 date

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of Mark Robert Williams

Comes now Mark Robert Williams who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 1027 Park West Dr. in Charlotte, North Carolina, county of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 11 miles from CATAWBA reactors and 17 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be

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f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

11 SEPTEMBER, 2001

signature date

JANET J. MALONE 9/11/01

notary date

EXPIRES 2-5-2006
UNION Co.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of Michael Reno Harrell

Comes now Michael Reno Harrell who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 3000 Somerset Dr. in Charlotte, North Carolina, county of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 11 miles from CATAWBA reactors and 17 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

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e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be

affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

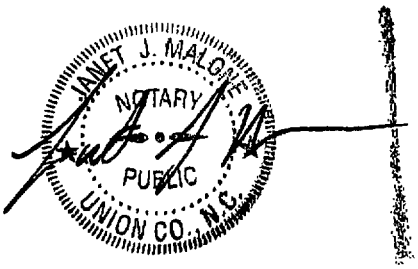
f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

signature _____ date 9-11-01

JANET J. MALONE _____ 9/11/01

notary _____ date



EXPIRES 2-5-2006
UNION Co. N.C.

JNITED STATES OF AMERICA
IUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of Thomas Kuhn

Comes now Thomas Kuhn who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 6315 Rosecrest Dr. in Charlotte, North Carolina, county of Mecklenburg.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 9 miles from CATAWBA reactors and 19 miles from McGUIRE reactors.

). I am a member of the Blue Ridge Environmental Defense League, which has made :ommitments of time and resources in the petition to intervene in the matter of DUKE's 'equest for license extensions at McGUIRE and CATAWBA.

:. A major nuclear accident during reactor operations, during transportation or in the rradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the .ow Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of :he current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal ife and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be

affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

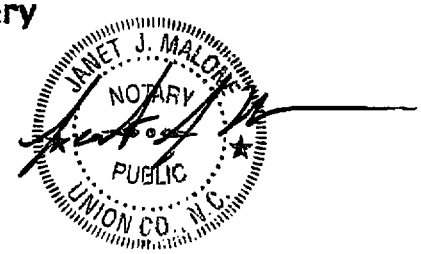
g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Thomas K Lee 9/11/01

signature date

Janet J. Malone 9/11/01

notary date



Expires 2-5-2006
Union Co. N.C.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 12, 2001

Affidavit of Rosemary B. Hubbard

Comes now Rosemary B. Hubbard who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 2607 Toddville Rd. Charlotte
street address city

North Carolina Mecklenburg
state county

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 5.8 miles from CATAWBA reactors and 18.2 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary

'eedwater pipes (the only source of water for steam generators when the main feedwater ;ystem fails), and examples of poor engineering performance at CATAWBA. Ice condensers nust work during a reactor emergency, as an air bag must work during an auto accident. 'he Donald C. Cook nuclear plant with similar technology was shut down because of ice :ondenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my nealth and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year ;eriod.

'. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the :harlotte/Rock Hill metropolitan area for a variety of services such as transportation and nedical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have ;ignificant personal interests in this matter which may be affected by the results of the :urrent proceedings, including but not limited to, continued access to employment, nedical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly ncreases the risk of a major nuclear accident that would harm myself, my family, my ;roperty, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of rradiated MOX fuel with substantially higher plutonium content than existing irradiated 'uel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not imited, to the determination of health effects from a postulated accident, unreliability of ;ervice due to accelerated aging of the reactor, and whether the NRC will permit the use of ;lutonium/MOX fuel.

Rosemary B. Hubbard 9/14/2001

;ignature date

Anta Sane 9/14/01

notary date

ANTA SANE
Notary Public, Mecklenburg County, NC
My Commission Expires July 1, 2006

JNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff,

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 12, 2001

Affidavit of Jacqueline B. McElrath

Comes now Jacqueline B. McElrath who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 1238 Plumstead Rd. Charlotte
street address city

NC 28216 Mecklenburg
state county

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately _____miles from CATAWBA reactors and 11.3 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary

eedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Jacqueline B McElrath 9/14/01

signature date

Robin R Biddy 9/14/01

notary date

"OFFICIAL SEAL"
Notary Public, North Carolina
County of Gaston
Robin R. Biddy
My Commission Expires 1/31/06

North Carolina Mecklenburg County I Robin R. Biddy a Notary Public of Gaston County Certify that Jacqueline B. McElrath Appeared Before me this 14th day of Sept, 2001 And Acknowledged the foregoing instrument

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD
Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff
Docket Nos. 50-369, 50-370, 50-413, and 50-414
In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of Betty Yurkas

Comes now Betty Yurkas who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 19927 Oak Leaf Circle in ~~Charlotte~~ city Cornelius, NC. 28031, Meck County county state

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 40 miles from CATAWBA nuclear reactors and 8 miles from McGUIRE nuclear reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of

people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Betty Yuhas — 9-12-01

signature — date

Michelle Dawn Hutto — 9-12-01

notary — date

)NITED STATES OF AMERICA
)UCLEAR REGULATORY COMMISSION
)TOMIC SAFETY AND LICENSING BOARD

)ecretary of the Commission, U.S.
)uclear Regulatory Commission,
)ashington DC 20555-0001, Attention:
)ulemakings and Adjudications Staff,

)ocket Nos. 50-369, 50-370, 50-413, and 50-414

)n the Matter of DUKE ENERGY CORPORATION
)cGuire Units 1 and 2, Catawba Units 1 and 2

)eptember 12, 2001

)ffidavit of Allen S. Hubbard

)omes now Allen S. Hubbard who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request)or Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for)uke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba)uclear Stations 1 and 2 [CATAWBA].

2. I reside at 2607 Toddville Road Charlotte
street address city

North Carolina Mecklenburg
state county

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

1. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately ~~12~~ 15.8 miles from CATAWBA reactors and 12 miles from McGUIRE reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary

'eedwater pipes (the only source of water for steam generators when the main feedwater ;ystem fails), and examples of poor engineering performance at CATAWBA. Ice condensers nust work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice :ondenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my nealth and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year oeriod.

:. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and nedical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have ;ignificant personal interests in this matter which may be affected by the results of the :urrent proceedings, including but not limited to, continued access to employment, nedical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly ncreases the risk of a major nuclear accident that would harm myself, my family, my oroperty, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of rradiated MOX fuel with substantially higher plutonium content than existing irradiated 'uel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not imited, to the determination of health effects from a postulated accident, unreliability of ;ervice due to accelerated aging of the reactor, and whether the NRC will permit the use of olutonium/MOX fuel.

Allen Hubbard 9/14/01

signature date

Anta Sane 9/14/01

notary date

ANTA SANE
Notary Public, Mecklenburg County, NC
My Commission Expires July 1, 2006

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD
Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555-0001, Attention:
Rulemakings and Adjudications Staff
Docket Nos. 50-369, 50-370, 50-413, and 50-414
In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2
September 14, 2001
Affidavit of Catherine H. Thompson
Comes now Catherine H. Thompson who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 6318 Duck Dogwood Lane in Charlotte N C 28262
city
Mecklenburg
county state
I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 140 ecm miles from CATAWBA nuclear reactors and 84 ecm miles from McGUIRE nuclear reactors.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I

expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

Steven B. Thompson 9-12-01
signature date

Notary Public 9-12-01
notary date

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission, U.S.
Nuclear Regulatory Commission,
Washington DC 20555?0001, Attention:
Rulemakings and Adjudications Staff

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION
McGuire Units 1 and 2, Catawba Units 1 and 2

September 14, 2001

Affidavit of ROBERT PHILLIPS MAHOOD

Comes now ROBERT PHILLIPS MAHOOD who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 118 SHORECREST DRIVE in

city DAVIDSON

county MECKLENBURG state NORTH CAROLINA

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the license

for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately 30 miles from CATAWBA and 5 miles from McGUIRE.

b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.

c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.

d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency: Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis: Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA, opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my family will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the

performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my family will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. I am employed in the Charlotte, NC , metropolitan area and I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as transportation and medical services; recreation on Lake Wylie/Lake Norman/Catawba River/elsewhere and enjoyment of numerous cultural and educational activities in the Charlotte area. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to employment, medical services, and/or recreational facilities following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my family, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited, to the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

h. The McGuire plant was built in a relatively remote and lightly populated area with fairly adequate roads to use for evacuation. However in the intervening years, Duke through its fully owned subsidiary, Crescent Resources, has fomented such excessive over-development that now the roads are daily in gridlock and any evacuation would be utterly impossible in any nuclear emergency.

i. The penetration of four concentric buildings of the Pentagon by a hijacked commercial jet makes clear that a similar attack on McGuire would penetrate its shell and release plutonium into the community - therefore the sooner the conversion of McGuire and Catawba to non-nuclear power (e.g. gas) the better.

Robert P. Mahood

Robert Phillip Mahood

signature

SEPT 12, 2001

date

ROBERT P. MAHOOD

DATE: SEPT 12, 2001

Christin Bradley

notary

9/12/01 comm exp 9-12-03

date

CHRISTIN BRADLEY NOTARY PUBLIC MECKLENBURG COUNTY, N.C.

CHRISTIN BRADLEY NOTARY PUBLIC MECKLENBURG COUNTY, N.C. comm exp 9-12-03

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Attention: Rulemakings and Adjudications Staff

Docket Nos. 50-369, 50-370, 50-413, and 50-414

In the Matter of DUKE ENERGY CORPORATION McGuire Units 1 and 2, Catawba Units 1 and 2

September 13, 2001

Affidavit of CONSTANCE E. KOLPITCKE

Comes now Constance E. Kolpitcke who deposes and states as follows:

1. This affidavit is in support of Blue Ridge Environmental Defense League's (BREDL) Request For Hearing and Petition for Leave to Intervene with respect to the renewal of licenses for Duke Energy Corporation's (DUKE) McGuire Nuclear Stations 1 and 2 [McGUIRE] and Catawba Nuclear Stations 1 and 2 [CATAWBA].

2. I reside at 21024 Pine Street in the town of Cornelius, Mecklenburg County, North Carolina.

I hereby petition that I have a personal interest in the proposed 20 year license renewals for DUKE's nuclear power stations at CATAWBA and McGUIRE. BREDL's Petition for Leave to Intervene sets forth with particularity the interests of this petitioner and how those interests may be affected by the results of the current proceedings.

3. On June 13, 2001 DUKE submitted an application to renew the licenses for McGuire Nuclear Stations 1 and 2 and Catawba Nuclear Stations 1 and 2, identified by Operating License Nos. NPF-9, NPF-17, NPF-35, and NPF-52 respectively, for an additional 20 year period. The Notice of Receipt of Application was published in the Federal Register on July 16, 2001 [66 FR 37072].

4. I have a personal interest in the renewal of operating licenses for DUKE's nuclear power stations at McGUIRE and CATAWBA for the following reasons:

a. I live approximately seven miles from McGUIRE nuclear reactors and forty miles from CATAWBA nuclear reactors.
b. I am a member of the Blue Ridge Environmental Defense League, which has made commitments of time and resources in the petition to intervene in the matter of DUKE's request for license extensions at McGUIRE and CATAWBA.
c. A major nuclear accident during reactor operations, during transportation or in the irradiated fuel storage area would disperse dangerous levels of radioactivity, and exposure to such radiation is likely to cause cancer, induce chronic health problems or provoke other maladies resulting from radioactive contamination. Such contamination at McGUIRE and CATAWBA would drastically lower property values and cause immense social upheaval. In the case of a severe accident involving plutonium/MOX fuel, instead of the Low Enriched Uranium fuel now in use, even greater death and disease would occur. I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to the fact that any accident in the Charlotte metropolitan area would have a negative impact on my ability to live a normal life and would place me in a permanently contaminated landscape.
d. Federal regulations define the population zone near a licensed reactor in terms of public safety and the ability of residents to get away from the plant in an emergency. Factors to be considered include whether a specific number of people can be evacuated or instructed to take shelter on a timely basis. Public safety during an emergency depends on many factors such as location, number and size of highways, extent of advanced

planning, and the distribution of residents within the area. Since McGUIRE and CATAWBA opened in the 1980s, the population has expanded greatly and many new commercial and residential districts have been constructed in the vicinity of both plants. I expect this development to continue into the foreseeable future, resulting in even greater population density. This growth is uneven; that is, it does not follow any regular or predictable pattern. The effect of this growth is to alter the assumptions made by DUKE in its initial calculations of safety in the areas around McGUIRE and CATAWBA. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to whether I or my husband will be able to get to safety in the event of an emergency at McGUIRE or CATAWBA.

e. Hazards in nuclear plants are a combination of human and technical errors. Both types of error are noted in the NRC's Plant Performance Reviews (PPR) of the McGUIRE and CATAWBA. The NRC's PPR completed in March 1999 for McGUIRE and CATAWBA rated them merely "acceptable." The PPRs note shortcomings in ice condenser maintenance and inspection at McGUIRE and CATAWBA and corrosion of service water pipes and auxiliary feedwater pipes (the only source of water for steam generators when the main feedwater system fails), and examples of poor engineering performance at CATAWBA. Ice condensers must work during a reactor emergency, as an air bag must work during an auto accident. The Donald C. Cook nuclear plant with similar technology was shut down because of ice condenser problems. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, whether my health and safety and the health and safety of my husband will be endangered by the NRC granting DUKE operating permits for McGUIRE and CATAWBA for an additional 20 year period.

f. Since I live in the Charlotte, NC metropolitan area, I am dependent upon the Charlotte/Rock Hill metropolitan area for a variety of services such as: public highways and streets for transportation and travel; medical services; shopping; recreation at various parks including Jetton Park on Lake Norman; and cultural and educational events. Many of these services are accessed short distances from Lake Norman along which the McGuire reactors are situated . I have significant personal interests in this matter which may be affected by the results of the current proceedings, including but not limited to, continued access to the aforementioned services following a reactor accident.

g. The use of MOX/plutonium fuel at McGUIRE and CATAWBA unnecessarily and significantly increases the risk of a major nuclear accident that would harm myself, my husband, my property, and my lifestyle. Also, the proposed use of plutonium/Mixed Oxide (MOX) fuel in Duke Power nuclear reactors will result in the interim or even long-term storage of irradiated MOX fuel with substantially higher plutonium content than existing irradiated fuel. Finally, the use of plutonium/MOX fuel at McGUIRE and CATAWBA could shorten the life of the reactors through accelerated aging of vital components and/or create greater difficulties in reactor operations that could result in increased down time for the reactors and therefore undependable energy supplies. I have significant personal interests in this matter which may be affected by the results of the current proceedings including but not limited to, the determination of health effects from a postulated accident, unreliability of service due to accelerated aging of the reactor, and whether the NRC will permit the use of plutonium/MOX fuel.

h. AS THE EVENTS OF SEPTEMBER 11, 2001 HAVE SO INDELIBLY DEMONSTRATED, NUCLEAR POWER PLANTS AND THEIR OUTDOOR STORAGE OF SPENT FUEL ARE EXTREMELY VULNERABLE TO UNCIVILIZED TERRORIST ATTACK.

i. SINCE NO SOLUTION TO THE PROBLEM OF DISPOSAL AND LONG-TERM STORAGE OF NUCLEAR WASTE HAS BEEN DETERMINED BY THE FEDERAL GOVERNMENT OF THE UNITED STATES OF AMERICA, IT IS UNWISE AND IMPRUDENT TO EXTEND ANY NUCLEAR POWER PLANT LICENSES AT THIS TIME.

Constance E. Kolpitcke — Sept. 13, 2001
signature — date

Christin Bradley — 9/13/01
notary — date

comm exp 7/26/03

CHRISTIN BRADLEY NOTARY PUBLIC MECKLENBURG COUNTY, N.C.