

RAS 6725

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

August 19, 2003 (9:30AM)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

In matter of  
CFC LOGISTICS, INC.  
materials license application :

:  
:  
: DOCKET NO. 03036239  
:  
:  
:

SPECIFICATION OF AREAS OF CONCERN

Pursuant to the Board's Order, the proposed intervenors make the following specification of issues of concern, and submit that they confer standing on proposed intervenors, and are germane to this proceeding:

General Substantiation of Grounds of Concern: Lack of Information:

The refusal to make disclosure together with this history, unique nature of the facility, raise compound issues of concern as to the absence of adequate information.

A. The applicant has withheld information from the public, and has been dishonest about the grounds. The applicant's February affidavit states that the information is being withheld for security reasons only, and does not identify any trade secret issue. (Copy attached) In contradiction, the applicant, through counsel, represented in a telephone discussion on the record on August 8 and off the record on July 12 that the basis of the

of the withholding included specifically trade secret information.

B. The applicant also misrepresented the nature of the withheld information. On August 12, the applicant repeatedly asserted that the information was not relevant to the issue of standing and germaneness, because it related only to the assembly of components of the fuel rods, whereas the affidavit requesting nondisclosure (Copy attached), refers to much broader issues, which clearly relate to safety and also to security.

C. The applicant has also failed to provide any analysis for the potential safety failures, and their effects, as well as causes; and has failed to provide any analysis of security failures and their causes and effects. In the context of an untried facility, this lack of information.

D. The Board's order directs itself toward germaneness and standing, requires evidence to be provided to satisfy the Commission and the record, under both the Nuclear Act and National Environmental Policy Act, that adequate safety evaluation has occurred. In the absence of such analysis, concerns cannot be ruled out or confined. In the absence of necessary information, such analyses cannot be done, or corroborated or tested.

Effects: Risk of health effects, including chronic and disaster, will cause health effects, loss of natural resources, and adverse

Operational: That the facility represents concern because it presents a serious risk in that it is not be adequately protected against accidents and terrorism due to inadequate design, inadequate operational plans, and inherent danger.

1. Air Dispersion: No plans have or can be shown to assure against air dispersion because of low level plans and construction.

1.1 Cracking of vessel containing cobalt-60

1.11 Event: The vessel containing the cobalt-60 which require continual water cooling may crack from loss of coolant.

1.12 Impact: Radiation would be emitted into the air which would harm intervenors, some of whom live 13 miles from the site and most of whom live within a mile of the facility.

1.13 Substantiation: An expert who examined the license application found that the loss of coolant or the failure of pumps to remove heat from the water may cause the water to boil, pressurization of the vessel, causing the cobalt-60 rods to overheat and compromising the vessel. Radiation would then be emitted into the air.

1.14 Source: Reply July 17, 2003 p. 14; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D.

1.2 Neighbors Air Circulation

1.21 Event: Air circulation around the vessel containing the cobalt-60 could emits radiation into the air.

1.22 Impact: Radiation emitted into the air would harm proposed intervenors, most of whom live within a mile of the facility.

1.23 Substantiation: An expert who examined the license application found air circulation around the vessel is a potential source of environmental contamination. Additionally, no dispersion analysis has been provided to show such emissions can be confined to the facility site. The application has no discussion of the radiation criteria for shutting down the facility; what radiation concentrations in air, resins and HEPA filters will cause applicant to investigate radiation leakage and shut down the facility

1.24 Source: Reply July 17, 2003 p. 14; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D.

### 1.3 Radioactive Waste

1.31 Event: Storage of radioactive waste at the facility may emit radiation into the air.

1.32 Impact: Emission of radiation into the air would harm proposed intervenors, most of whom live within a mile of the facility.

1.33 Substantiation: An expert who examined the license

application found the storage of radioactive waste in the form of resins collected from water chemistry controls is a potential source of environmental contamination. Additionally, no dispersion analysis has been provided to show such emissions can be confined to the facility site.

1.34 Source: Reply July 17, 2003 p. 14; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D.

#### 1.4 Rods

1.41 Event: Mishandling of cobalt-60 rods could emit radiation into the air.

1.42 Impact: Emission of radiation into the air would harm proposed intervenors, most of whom live within a mile of the facility.

1.43 Substantiation: An expert who examined the license application found the mishandling of cobalt-60 rods during transportation, loading and discharge, cracking and leaks from the rods are potential sources of environmental contamination. No dispersion analysis has been provided to show such emissions can be confined to the facility site. Further, the license application does not describe the procedures for loading and unloading sources, including emergency procedures for accidents in loading and unloading sources. Therefore, proposed intervenors and experts are unable to assess these procedures for

important safety information.

1.44 Source: See Reply July 17, 2003 p. 14; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D; CFC license application February 25, 2003.

#### 1.5 Loss of Electricity

1.51 Event: A loss of electricity could compromise cobalt-60 and emit radiation into the air.

1.52 Impact: Radiation could be emitted into the air causing harm to proposed intervenors most of whom live less than one mile from the facility.

1.53 Substantiation: In the event of a loss of power while a bell containing cobalt-60 is underwater, the source could become water-logged, distribute itself within the pool, thereby clogging the filters. In changing the clogged filters, cobalt-60 may be released into the air. The license application does not provide emergency procedures for this potential accident.

1.54 Source: See CFC license application February 25, 2003.

#### 1.6 Damaged Air Line

1.61 Event: A damaged air line could compromise cobalt-60 and emit radiation into the air.

1.62 Impact: Radiation could be emitted into the air causing harm to proposed intervenors most of whom live less than one mile from the facility.

1.63 Substantiation: The license application contains no emergency procedures for accidents involving a break in the compressed air line. This break would allow water to enter the bell holding the cobalt-60 underwater, would degrade the source in the pool, clog the filters. In changing the clogged filters, cobalt-60 would be emitted into the air.

1.64 Source: See CFC license application February 25, 2003.

#### 1.7 Ozone Dispersion

1.71 Event: Irradiation facilities generate high levels of ozone that is particularly harmful because of its close proximity to the ground.

1.72 Impact: Proposed intervenors live in close proximity to the facility and would be harmed by the dangerous exposure to ozone.

1.73 Substantiation: An expert has noted that ozone harms the community surrounding an irradiation facility because it is a very toxic atmospheric pollutant when it is close to ground level instead of high in the stratosphere.

1.74 Source: See Hearing Request June 23, 2003 p. 2; "Food Irradiation Threatens Public Health" attached to Hearing Request June 23, 2003.

#### 1.8 Installation and Assembly:

1.81 Event: Plans for assembly and installation are

new, untried on a large scale, and have not been made available for safety review.

1.82 Impact: Proposed intervenors live in close proximity to the facility and would be harmed by air or water dispersion that may occur.

1.83 Substantiation: Applicant's claim of trade secret.

1.84 Source: See Reply July 17, 2003 p. 14.

## 2. Neighbors Security

2.1 Irradiation facility is inadequately regulated and secured; no security data is available. Security issues are serious with generalized effect.

2.11 Event: Because irradiation facilities are relatively small, they are often unregulated and lack adequate security.

2.12 Impact: Irradiation facility are vulnerable to national security breaches and terrorism (for example, criminal background checks on employees are not required). Thefts may "go bad," causing release of cobalt-60, thereby threatening the proposed intervenors who live in close proximity to the facility.

2.13 Substantiation: Experts warn that due to inadequate security at irradiation facilities, these facilities are vulnerable to sabotage, particularly because terrorists may attempt to steal cobalt pellets from irradiation facilities that can be mixed with conventional explosives to produce "dirty



bombs." Also see CFC and Gray\*Star's submissions regarding such a threat.

2.14 Source: See Hearing Request June 23, 2003 p. 2; "Food Irradiation Threatens Public Health" and "Preventing Pathogenic Food Poisoning" attached to Hearing Request June 23, 2003.

2.2 Security Plan Is Not Adequate and Cannot be Made Adequate.

2.21 Event: CFC has not made any security measures and procedures publically available.

2.22 Impact: Proposed intervenors and their experts are unable to assess the facility's security provisions.

2.23 Substantiation: CFC has omitted all security provisions from its license application that is publically available on the NRC website.

2.24 Source: See Hearing Request June 23, 2003 p. 2; See Reply July 17, 2003 p. 16; CFC license application February 25, 2003.

### 3. Exposure To Irradiation Facility Workers (Air and Water)

3.1 Event: Irradiation facility workers may be exposed to dangerous levels of radiation.

3.2 Impact: Exposed workers could spread radioactivity to locations outside the irradiation facility thereby harming proposed intervenors.

3.3 Substantiation: For example, in Decatur, Georgia in June 1988, two workers who were exposed to cesium-137 left the facility and spread radioactivity to their cars and homes.

3.4 Source: See Hearing Request June 23, 2003 p. 2; "The Dangers of Irradiation Facilities: A Legacy of Deaths, Injuries, Accidents and Cover-ups" attached to Hearing Request June 23, 2003.

#### 4. Neighbors Water Dispersion

4.1 Event: Public water system may be accidentally, recklessly, or intentionally contaminated with cobalt-60 due to leakage into groundwater.

4.2 Impact: Proposed intervenors' health and safety would be jeopardized by contamination of drinking water, particularly because the water table is close to the surface in Milford Township.

4.3 Substantiation: For example, in Dover, New Jersey in June 1986, workers were instructed to pour 600 gallons of water contaminated with cobalt-60 down a shower drain that emptied into the public water system. In Parsippany, New Jersey in June 1974, radioactive water from a cobalt-60 storage pool was flushed down the toilet into the public sewer system.

4.4 Source: See Hearing Request June 23, 2003 p. 2; "The Dangers of Irradiation Facilities: A Legacy of Deaths, Injuries, Accidents and Cover-ups" attached to Hearing Request June 23,

2003.

5. Transportation of Hazardous Radioactive Material (Air, Water and Ground)

5.1 Accident

5.11 Event: The irradiation facility must be regularly replenished with cobalt-60, thereby increasing transportation hazards (locally and nationally).

5.12 Impact: An accident involving the transport of cobalt-60 or radioactive waste will expose proposed intervenors to radioactive emissions.

5.13 Substantiation: The license application does not describe the emergency procedures for accidents in loading and unloading sources. Therefore, proposed intervenors and experts are unable to assess these procedures for important safety information.

5.14 Source: See Hearing Request June 23, 2003 p. 2; Reply July 17, 2003 p. 15; Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D; CFC license application February 25, 2003.

5.2 Terrorism

5.21 Event: The irradiation facility must be regularly replenished with cobalt-60, thereby increasing transportation hazards (locally and nationally) and the risk of sabotage or terrorism.

5.22 Impact: Experts have found sabotage or a terrorist attack on frequent shipments of radioactive material exposes proposed intervenors to radioactive emissions.

5.23 Substantiation: The license application does not describe the emergency procedures for sabotage in transporting sources. Therefore, proposed intervenors and experts are unable to assess these procedures for important safety information.

5.24 Source: See Hearing Request June 23, 2003 p. 2; "Zapping the Food Supply" p. 4 attached to Hearing Request June 23, 2003.

## 6. Experimental Design

6.1 Event: The facility is a "first of a kind" (a scale up from an experimental operation of 17,000 curies of cobalt-60 to 1,000,000 curies), and is atypical of other radiation-source irradiators in the United States.

6.2 Impact: An experimental and unprecedented design places proposed intervenors at greater risk of radiation exposure because the design has not been sufficiently tested and is more likely to be faulted.

6.3 Substantiation and source: See Preliminary Report of R. Alvarez attached to Reply July 17, 2003 as Exhibit D.

## 7. General - Air, Water and Other

7.1 Event: The applicant does not have a cost estimate for decommissioning. 10 CFR 30.35(e) states, "[e]ach decommissioning


funding plan must contain a cost estimate for decommissioning and a description of the method of assuring funds for decommissioning from paragraph (f) of this section, including means for adjusting cost estimates and associated funding levels over the life of the facility." The applicant has offered the minimum \$75,000 financial assurance, but has not come forward with a decommissioning plan.

7.2 Impact: Proposed intervenors may be affected by serious air and water dispersion due to lack of maintenance.

7.3 Substantiation: 10 CFR 30.35(e) and orphan site problems.

7.4 Source: CFC license application February 25, 2003.

Respectfully Submitted,

  
ROBERT J. SUGARMAN  
I.D. NO. 03332  
COUNSEL FOR PROPOSED  
INTERVENORS

OF COUNSEL:  
SUGARMAN & ASSOCIATES  
100 N. 17<sup>th</sup> Street - 11<sup>th</sup> floor  
Philadelphia, PA 19103  
(215) 864-2500

Dated: August 14, 2003

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

In matter of :  
CFC LOGISTICS, INC. : DOCKET NO. 03036239  
materials license application :  
:  
:

CERTIFICATION OF SERVICE

This is to certify that in this case complete copies of all papers contained in the Specification of Areas of Concern, affidavits and map have been served upon the following persons, by e-mail and overnight mail (where e-mail address is given) or first class mail on August 14, 2003:

Anthony J. Thompson, Esq.  
Christopher S. Pugsley, Esq.  
Law Offices of Anthony J. Thompson, P.C.  
1225 19<sup>th</sup> Street, N.W.  
Second Floor  
Washington, DC 20036  
[ajthompson@athompsonlaw.com](mailto:ajthompson@athompsonlaw.com)

U.S. Nuclear Regulatory Commission  
Office of the Secretary  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20851

John Kinneman  
Branch Chief, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

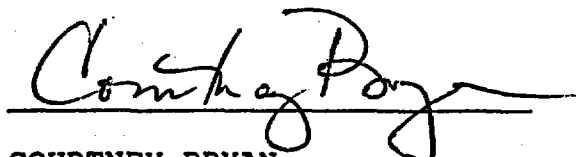
Administrative Judge  
Charles N. Kelber  
Special Assistant  
Atomic Safety and Licensing Board Panel  
Mail Stop - T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
cnk@nrc.gov

Administrative Judge  
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Presiding Officer  
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U.S. Nuclear Regulatory Commission  
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James Wood  
President  
CFC Logistics, Inc.  
400 AM Drive  
Quakertown, PA 18951

Stephen Lewis, Esq.  
Counsel for NRC Staff  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
shl@nrc.gov

  
COURTNEY BRYAN

SUGARMAN & ASSOCIATES  
100 N. 17<sup>th</sup> Street, 7<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 864-2500



## Affidavit

L30804  
030-36239  
03521  
(37-30804-02)

I, James Wood, being duly sworn, depose and state as follows:

- (1) I am the president of CFC Logistics, Inc. ("Applicant").
- (2) As president of the Applicant, I am authorized to apply for withholding of submitted materials to the US Nuclear Regulatory Commission from public disclosure.
- (3) The Applicant requests that certain information be withheld from the "Application for Material License For CFC Logistics, Inc. Rev. 01".
- (4) The specific information requested to be withheld:

1. Radiation Safety Program, Security Section.

Due to heightened awareness of security issues since September 11, 2001, the Applicant has taken extra measures to supplement existing security for the facility. The Applicant requests that this information be withheld from public disclosure. The public disclosure of this information might be used to endanger the facility and personnel. A person or persons intent on doing harm might be able to subvert the detailed security measures if they are provided this detailed information. We believe that this in accordance with the objectives of 10CFR2.790(1)(i)

2. Non-Routine Operations.  
Procedures (in their entirety):

GI-201 Source Repositioning  
GI-202 Source Loading  
GI-203 Source Unloading

Due to heightened awareness of security issues since September 11, 2001, the Applicant requests these procedures to be withheld from public disclosure. These specific procedures detail the handling of the sealed source material. Should, for any reason, an unauthorized person(s) try to damage, expose or remove a sealed source, the public, facility and personnel might be endangered. Providing this material to such unauthorized person(s) might facilitate intent to do harm because these procedures would give them specific instruction of how to handle and remove source material. We believe that this in accordance with the objectives of 10CFR2.790(1)(i)

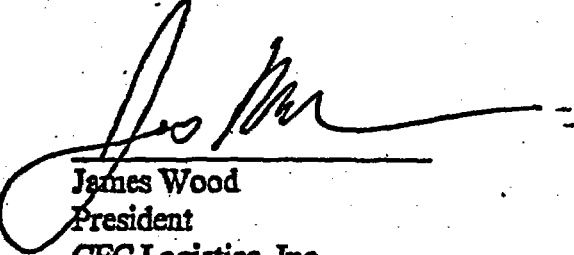
- (5) A copy of the Application will be provided for public disclosure which has the above information withheld. The specific pages withheld will be indicated by replacement page indicating "This page has been withheld from public disclosure".



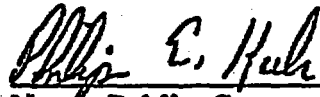
James Wood, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information and belief.

Executed at Hatfield Township, Pennsylvania, this 18<sup>TH</sup> day of February, 2003.

  
James Wood  
President  
CFC Logistics, Inc.

Subscribed and sworn before me this 18<sup>TH</sup> day of FEBRUARY, 2003



Notary Public, Commonwealth of Pennsylvania

My Commission Expires

Notarial Seal  
Philip E. Keeler, Notary Public  
Hatfield Twp., Montgomery County  
My Commission Expires Aug. 10, 2004  
Member, Pennsylvania Association of Notaries

## Location of Residents Signing Affidavits



Red Triangles are  
Requestors.

DOQQ Originator:

U.S. Geologic Survey; Pennsylvania Bureau of Topographic and Geologic Survey

Flight date: April, 1999

Location map prepared by: William Heasom, P.E. (215)-536-3944  
2505 Tirjan Ave.; Quakertown, PA 18951

| Seq. No | Address | Road                 | First Name        | Last Name     | Phone        | GPS Point No | Note                         | North<br>(degrees)(NAD 83) | West<br>(degrees)(NAD 83) | Distance to CFC<br>(feet) |
|---------|---------|----------------------|-------------------|---------------|--------------|--------------|------------------------------|----------------------------|---------------------------|---------------------------|
|         | No.     |                      |                   |               | (215) Prefix |              |                              |                            |                           |                           |
|         |         |                      |                   | CFC log.      |              | 194          | 500' N of plant              | 40.44175                   | 75.42581                  |                           |
|         |         |                      |                   | CFC log.      |              | 195          | 500' N of NE cor plant       | 40.44181                   | 75.42415                  |                           |
| 1       | 1730    | Red Bud Road         | Andrew            | Ford          | 538-7150     | 196          | S. Side of street (opposite) | 40.43649                   | 75.42988                  | 1800                      |
| 2       | 1742    | Red Bud Road         | Tom & Kelly       | Helt          | 529-9332     | 197          | ? (SW side) opposite         | 40.43646                   | 75.42926                  | 1700                      |
| 3       | 2086    | Huber Drive          | Catherine         | Fletcher      | 529-4749     | 198          | going SW to right            | 40.43719                   | 75.43602                  | 3300                      |
| 4       | 2083    | Huber Drive          | Roseanne          | Kelsell       | 529-4756     | 199          | going SW to left             | 40.43702                   | 75.43660                  | 3400                      |
| 5       | 2082    | Huber Drive          | Barbara           | Lorman        | 529-1306     | 200          | going SW to right            | 40.43699                   | 75.43650                  | 3400                      |
| 6       | 2067    | Huber Drive          | David             | Fhl           |              | 201          | going SW to left             | 40.43637                   | 75.43776                  | 3900                      |
| 7       | 2065    | Huber Drive          | John              | Grabowski     | 538-9155     | 202          | going SW to left             | 40.43632                   | 75.43782                  | 3900                      |
| 8       | 2066    | Huber Drive          | Brian             | Zerbert       | 538-0565     | 202          | going SW to right            | 40.43632                   | 75.43782                  | 3900                      |
| 9       | 2017    | Huber Drive          | Cliff             | Evan          |              | 203          | going NE to left             | 40.43535                   | 75.43629                  | 3700                      |
| 10      | 2013    | Huber Drive          | Robert & Jennifer | Ulrich        | 529-1630     | 204          | going NE 50' left            | 40.43560                   | 75.43601                  | 3500                      |
| 11      | 2007    | Huber Drive          | Suzi              | Glowaski      | 538-2525     | 205          | going NE 60' left            | 40.43597                   | 75.43561                  | 3400                      |
| 12      | 2006    | Huber Drive          | Anita             | Boyer         | 538-7441     | 206          | going NE 30' right           | 40.43607                   | 75.43551                  | 3300                      |
| 13      | 2000    | Huber Drive          | Jennifer          | Howett        | 538-7945     | 207          | going NE 30' right           | 40.43643                   | 75.43513                  | 3100                      |
| 14      | 1999    | Huber Drive          | Christina         | Butcher       | 538-6274     | 208          | going NE 50' left            | 40.43662                   | 75.43502                  | 3100                      |
| 15      | 2125    | Gable Lane           | Hetal             | Peters        |              | 209          | going NW to right            | 40.43515                   | 75.43715                  | 3800                      |
| 16      | 1875    | Wentz Road           | Ken               | Reynolds      |              | 210          | Headed NW 30' left           | 40.44579                   | 75.41997                  | 2400                      |
| 17      | 2180    | Weiss Road           | Sandra            | Hinkle        |              | 211          | Headed S 100' right          | 40.43957                   | 75.41499                  | 2700                      |
| 18      | 2071    | Millford Square Pike | Tiffany           | Biagioli      | 538-2606     | 212          | going E 100' on right        | 40.43590                   | 75.40626                  | 5400                      |
| 19      | 1920    | Allentown Road       | Phil & Judy       | Stein & Szela | 529-5562     | 213          | NW of bridge over unami      | 40.42666                   | 75.39723                  | 8600                      |
| 20      | 1860    | Fox Lair Drive       | Lori Beth         | Verba-Martin  | 529-6541     | 214          | Heading N 50' right          | 40.42438                   | 75.37088                  | 16100                     |
| 21      | 1406    | Concord Court        | Charles           | Moyer         | 529-4511     | 215          | Heading W 50' right          | 40.42032                   | 75.37293                  | 16100                     |
| 22      |         | Huber Drive          | Nancy             | Comfort       | 804-0163     |              |                              |                            |                           |                           |

## **Procedure Used for Preparing Location Map and "Crow Fly" Distances from Affidavit Signatories to CFC Facility**

### **Executive Summary:**

I was furnished a list of addresses for location (in relation to the CFC facility near the PA Turnpike). I used a procedure that I have used for similar reconnaissance or feasibility surveys. Using a Garmin GPS 12 XL device, I recorded a GPS coordinate at points opposite the CFC facility (from the public access road) and at points in the road in front of each residential location. I made a note of distance from my observation point to the residential building associated with the address if that was possible to determine from the road.

I downloaded (or updated my) computer files and associated metadata for the Milford Township and Quakertown USGS Quadrangles from the PASDA web site. PASDA (<http://www.pasda.psu.edu/about/index.shtml>) is described as follows:

The Pennsylvania Spatial Data Access system (PASDA) is Pennsylvania's official geospatial information clearinghouse and the Commonwealth's node on the National Spatial Data Infrastructure (NSDI). The PASDA clearinghouse provides for the widespread sharing of geospatial data, eliminates the creation of redundant data sets, and serves as a resource for locating data throughout the Commonwealth through its data storage, interactive mapping/webgis applications, and metadata/documentation efforts.

I used the GIS software, ArcView GIS v. 3.2 (a widely used tool compatible with the PASDA data and with my GPS observations), to show the locations of the CFC facility, the roads and streams of Bucks County, and the individual residences of the signatories on a composite map. Using the distance measuring tool in the ArcView software, I compiled a list of distances to a point estimated to be centrally located within the CFC facility site. A visual inspection of the fit of the observed GPS locations with structures visible in the aerial photographs was made by way of confirmation. The fit of the roads and streams with the photograph also serves to confirm. Finally, some of the points were plotted on a USGS Quadrangle and the distances were measure with a scale to further verify the work.

Notice that many of the residences plotted as well as the local streets that serve them did not exist in 1999. That is the date of the most recent data available from PASDA.

William Heasom, P.E.  
August 11, 2003

AFFIDAVIT

Barbara Lorman, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2082 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 11 day of August, 2003.

Barbara Lorman  
Barbara Lorman

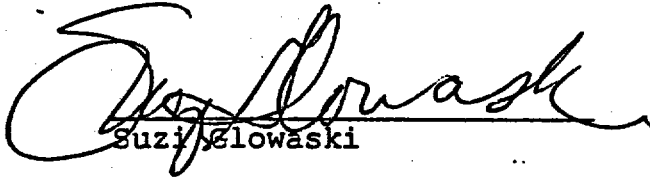
AFFIDAVIT

Suzi Glowaski, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2007 Huber Drive, Quakertown, PA 18951.
2. I live 1 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.

  
Suzi Glowaski

AFFIDAVIT

Suzi Glowaski, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2007 Huber Drive, Quakertown, PA 18951.

2. I live 1 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.

  
Suzi Glowaski

AFFIDAVIT

Kelly Helt, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1742 Red Bud Road, Quakertown, PA 18951.
2. I live 1/3 of a mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 11 day of aug, 2003.

Kelly A Helt  
Kelly Helt



AFFIDAVIT

Tom Helt, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1742 Red Bud Road, Quakertown, PA 18951.
2. I live 1/3 of a mile as the crow flies from the CFC

proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 11 day of Aug, 2003.

Thomas Helt  
Tom Helt

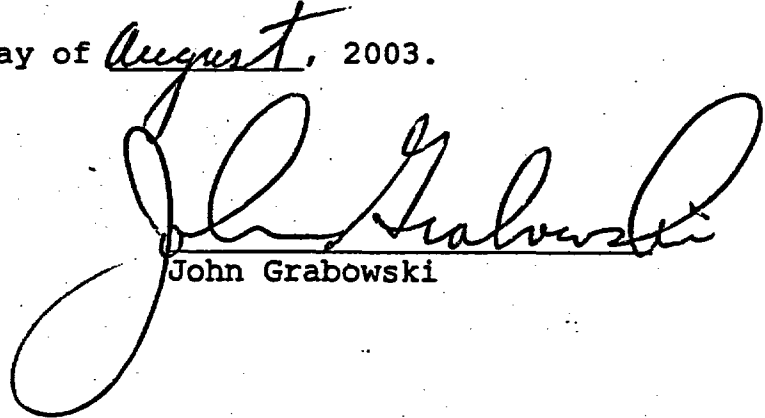
AFFIDAVIT

John Grabowski, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2065 Huber Drive, Quakertown, PA 18951.
2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 11 day of August, 2003.



John Grabowski

AFFIDAVIT

Judy Szela, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1920 Allentown Road, Quakertown, PA 18951.
2. I live 1 1/2 mi as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of Aug, 2003.

Judy Szela  
Judy Szela

AFFIDAVIT

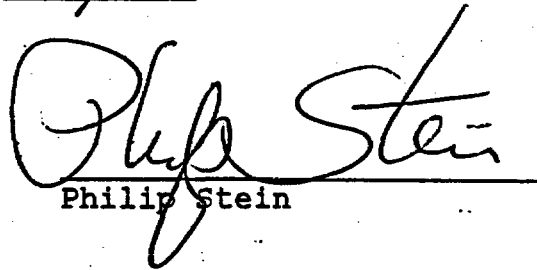
Philip Stein, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1920 Allentown Road, Quakertown, PA 18951.

2. I live 1 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 11 day of August, 2003.

  
Philip Stein

AFFIDAVIT

Tiffany Biagioli, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2071 Milford Square Pike, Quakertown, PA 18951.

2. I live 1 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.

Tiffany Biagioli  
Tiffany Biagioli

AFFIDAVIT

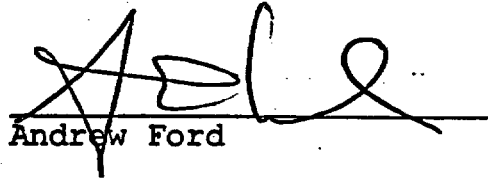
Andrew Ford, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at <sup>1730 Red Bud Rd.</sup> ~~2071 Milford Square Pike~~, Quakertown, PA 18951.

2. I live 1/3 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10<sup>th</sup> day of August, 2003.

  
Andrew Ford

AFFIDAVIT

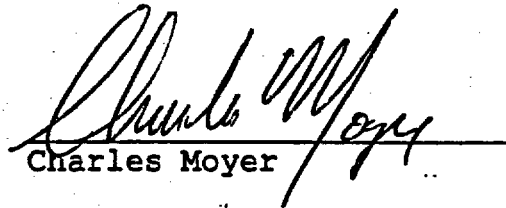
Charles Moyer, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1406 Concord Court, Quakertown, PA 18951.

2. I live 3 miles as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10<sup>th</sup> day of August, 2003.

  
Charles Moyer

AFFIDAVIT

Ken Reynolds, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1875 Wentz Road, Quakertown, PA 18951.
2. I live 1/4 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10<sup>th</sup> day of August, 2003.

  
Ken Reynolds



AFFIDAVIT

Catherine Fletcher, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2086 Huber Drive, Quakertown, PA 18951.
2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 9th day of Aug., 2003.

Catherine Fletcher  
Catherine Fletcher

AFFIDAVIT

Christina Butcher, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 1999 Huber Drive, Quakertown, PA 18951.

2. I live 5 1/2 MN as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 8 day of July 2003.

Christina Butcher  
Christina Butcher

AFFIDAVIT

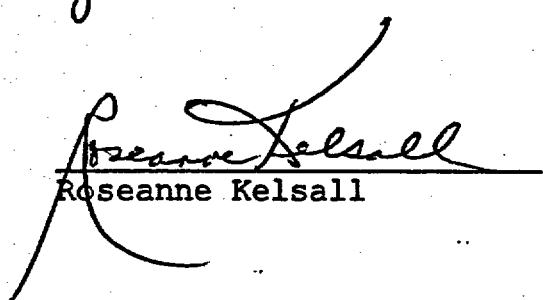
Roseanne Kelsall, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2083 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 9th day of August, 2003.

  
Roseanne Kelsall

AFFIDAVIT

Anita Boyer, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2006 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.

Anita Boyer  
Anita Boyer

AFFIDAVIT

Nancy Comfort, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2076 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile? as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 18 day of August, 2003.

Nancy Comfort  
Nancy Comfort

AFFIDAVIT

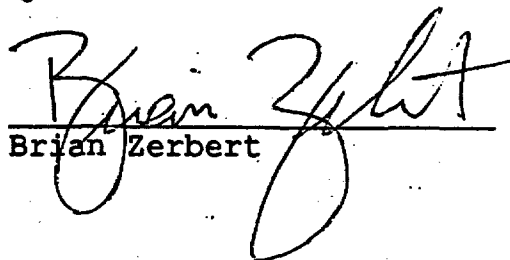
Brian Zerbert, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2066 Hubert Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.

  
Brian Zerbert

AFFIDAVIT

Jennifer Howlett, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2000 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10<sup>th</sup> day of August, 2003.

Jennifer Howlett  
Jennifer Howlett

AFFIDAVIT

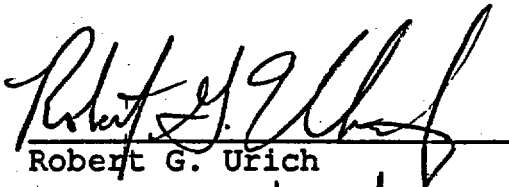
Robert G. Urich, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2013 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mi as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10<sup>th</sup> day of August, 2003.

  
Robert G. Urich  
urich



AFFIDAVIT

Jennifer Urich, pursuant to 28 U.S.C. Section 1746, states as follows:

1. I live at 2013 Huber Drive, Quakertown, PA 18951.

2. I live 1/2 mile as the crow flies from the CFC proposed irradiation facility in Milford Township.

The foregoing is true and correct, subject to the penalties for unsworn perjury.

Executed this 10 day of August, 2003.

  
Jennifer Urich Urich