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50-523 Skagit Nuclear Power Project; Unit 2, Puget Sound Pow 0500052
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SUBJECT: Suppl to amended petition to intervene, listing contentions
& basis for contentions.

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

PUGET SOUND POWER & LIGHT CO.)

et. al.)

(Skagit/Hanford Nuclear Project)

Units 1 and 2))

Docket Nos. STN 50-522

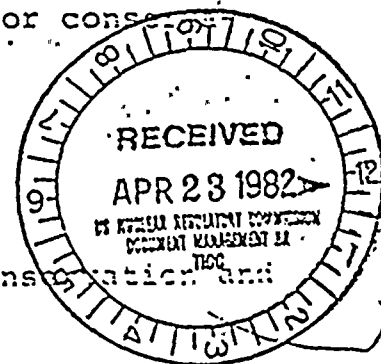
STN 50-523

SUPPLEMENT TO AMENDED PETITION FOR LEAVE TO INTERVENE BY
COALITION FOR SAFE POWER

Pursuant to Title Ten of the Code of Federal Regulations,
Part 2.714(b) Petitioner Coalition for Safe Power hereby submits
its supplement to its petition consisting of a list of conten-
tions and the bases for each contention.

1. Petitioner contends that Applicant has failed to show a need
for the S/HNP as required by the National Environmental Policy
Act and the Commission's rules. The need for the electrical
generating capacity of the project has not been properly esta-
blished because Applicant has not developed an adequate model
which takes the following into consideration:

- a. voluntary curtailment of electrical consumption;
- b. the continuing poor economy of the region;
- c. Bonneville Power Administration incentives for conservation;
- d. elasticity of demand;
- e. peak load pricing to flatten demand;
- f. mandatory new construction standards for conservation and solar;
- g. mandatory standards for commercial and industrial space heating and cooling, lighting and appliance use;



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cluded that the S/HNP is compatible with present or future use of the Hanford Reservation in failing to provide an assessment of the interactivity between the project and other nuclear and chemical industrial facilities by inadequately describing:

a. the changes in land-use within a fifty mile radius, including the development of a hazardous waste dump three miles from the proposed site; and

b. nuclear and chemical facilities within a fifty mile radius and the activities conducted therein.

47. Petitioner contends that Applicant has failed to conduct an assessment of the potential impact of the S/HNP on nuclear facilities and activities located on the Hanford Reservation and the ability of these operations to continue in the event of a major accident at the S/HNP.

48. Petitioner contends that the Applicant has failed to conduct an assessment of the potential impact of surrounding nuclear facilities and activities on the S/HNP, its ability to continue operation in the event of accidents at these facilities and the loss of operation ability of S/HNP. These facilities include the Fast Flux Test Facility, four miles from the proposed site, which has the potential for a 1,160 lbs. TNT accident and a containment capable of withstanding up to 150-300 lbs. TNT and the N-reactor which has no containment building.

Geology of the Proposed Site

49. Petitioner contends that present geology and seismic studies presented by the Applicant are inadequate and do not meet the requirements of 10 CFR 100 Appendix A. Applicant has not considered the safety significance of all linements

within a five miles radius of the site. Applicant has not adequately assessed the Cold Creek syncline. Applicant has not identified all faults in the Pasco Basin.

50. Petitioner contends that neither the Applicant nor the NRC Staff have factored in the effects of the Mt. St. Helens volcanic activity on the area's geology and seismicity and its effect on the project. Numerous scientists from the U.S. Geological Survey and the University of Washington have stated that the Mt. St. Helens activity has changed the geology of the Pacific Northwest and what is known about it. Considering the continuing nature of this activity it must be considered an unresolved issue.

51. Petitioner contends that Applicant has not considered the Hanford geology and seismology in the design of the plant and its safety systems. Applicant merely has taken the project from the Skagit site and placed it at Hanford. One example of this is the Missoula Sands issue raised by the Staff.

Washington Public Power Supply System Plants 4 and 5

52. Petitioner contends that Applicant has not considered the completion of the terminated nuclear projects WPPSS 4 and 5 as an alternative to the proposed project. Furthermore, Petitioner contends that since these two plants are under NRC jurisdiction the NRC Staff and the ASLB must investigate this alternative. Failure to do so would violate NEPA and the Commission's regulations.

53. Petitioner contends that WPPSS 4 and 5 would be more likely to be accepted by the Northwest Power Planning Council for regionalization than the S/EHP because construction has already been started on the units and because a majority of the re-

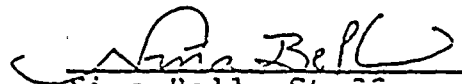
documents had been made available the issues would exist anyway. Furthermore Petitioners have already raised a number of issues and the possibility exists that no new issues will arise.

Conclusion

Given the above facts and the showing that the requirements of 10 CFR 2.711(a) and 2.714(a)(1) have been met, Petitioner Coalition for Safe Power prays that the Board in the above-captioned proceeding grant this motion for an extension of time.

Respectfully submitted,

Dated this day, the
20th of April, 1982


Tina Bell, Staff
Coalition for Safe Power