

AFFIDAVIT OF DOUGLAS KING ON CONTENTION 4 B

1. My name is Douglas King. My business address is Palmer School, 7900 S.W. 176th Street, Miami, Florida, 33157. A statement of my professional background and qualifications is attached to this affidavit and made a part thereof.

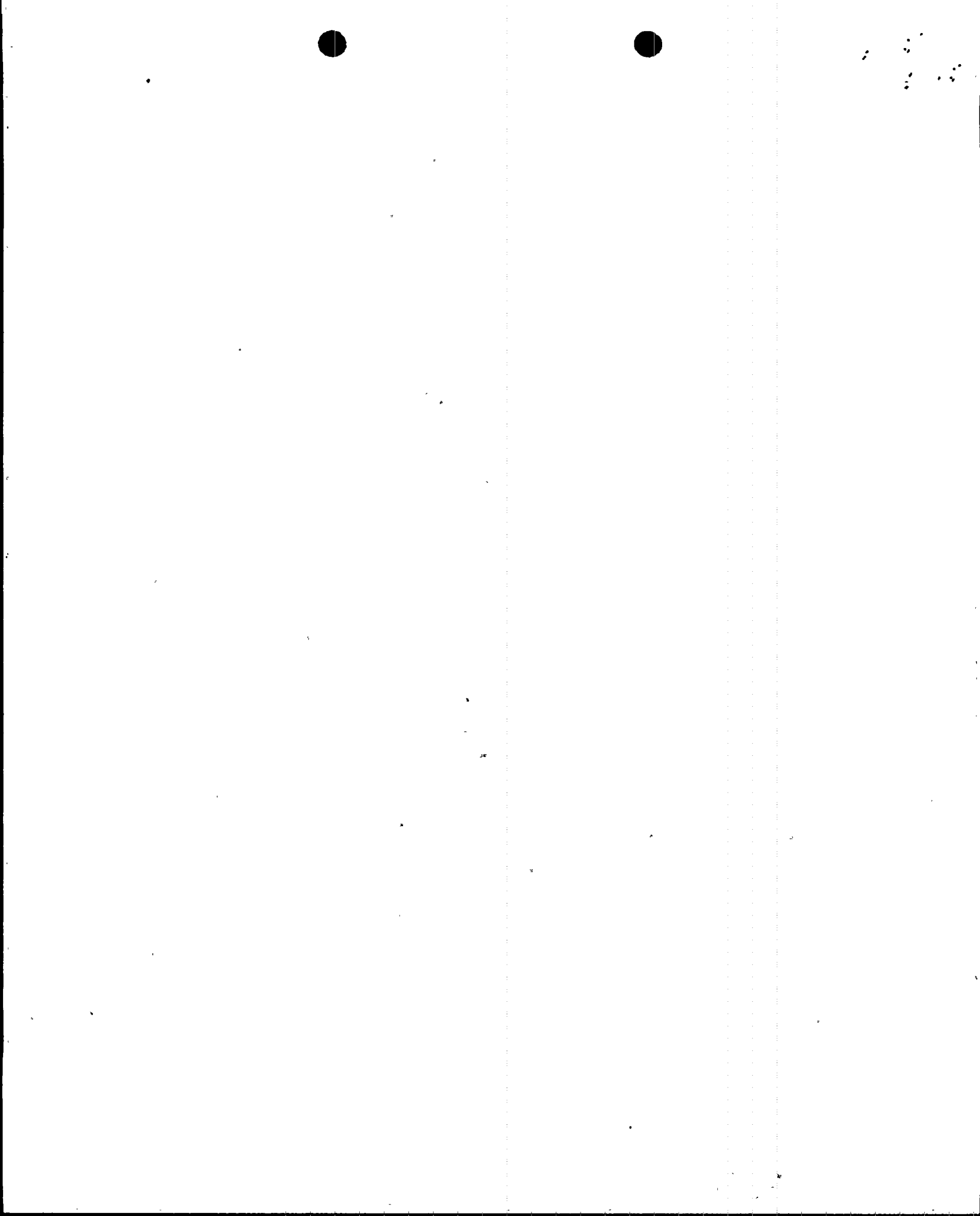
2. This affidavit addresses contention 4 B which states:

There are likely to occur radioactive releases, (from the steam generator repair) to unrestricted areas which violate 10 CFR Part 20 or are not as low as reasonably achievable within the meaning of 10 CFR Part 50 as a result of a hurricane or tornado striking the site during repairs.

3. I participated in the Turkey Point site inspection on April 19, 1981 as a member of Intervenor, Mark Oncavage's party. The inspection was authorized by the Atomic Safety and Licensing Board for the purpose of discovery.

4. I observed several locations of loosely stacked, sealed drums in roped off areas. These drums were identified as containing radioactive material

5. I monitored a few of these locations of loosely stacked sealed drums with a geiger counter. The readings indicated radiation above the background level.



6. The drums were apparently sealed but were neither fastened down nor covered. The drums were subject to weathering and other natural forces.

7. In all, several hundred drums were observed at these locations. At some locations, drums were loosely stacked on top of each other.

8. NUREG 0743, the Final Environmental Statement, states that the estimated amount of radioactive solid waste generated from the steam generator repair ranges from 1100 cubic meters to 2300 cubic meters, per unit. This estimate excludes the lower assemblies and the normal amount of solid waste from operations of 575 cubic meters, per unit per year.

9. NUREG 0743, the Final Environmental Statement, states that the waste limitation for Turkey Point wastes at the Barnwell disposal site is 57 cubic meters, per month, starting October 1981. No other site for the final disposition of these wastes is mentioned in the Final Environmental Statement.

10. I am professionally concerned that the ability of the sealed drums to completely contain the radioactive wastes

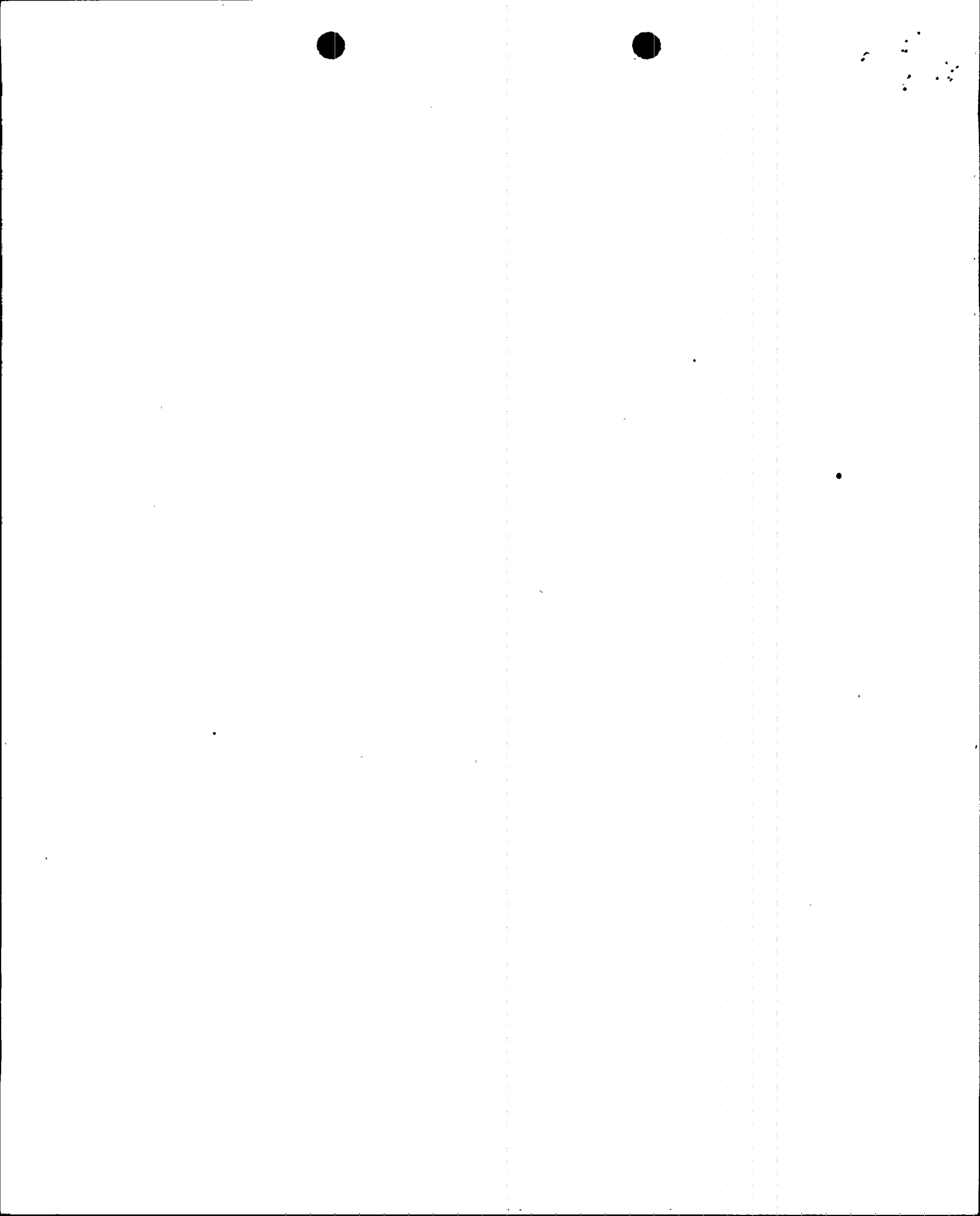


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will diminish, due to long term outdoor storage where natural weathering forces such as high rainfall, high humidity, high temperature, sunshine, salt spray, and storms can environmentally degrade the sealed drums.

CONCLUSION

If a hurricane or tornado, with the ability to breach and flood the drums of radioactive wastes, were to strike Turkey Point, a contaminating accident will occur. The magnitude of the contamination would increase as the the numbers of breached drums increases. The vast amounts of wastes discussed and the degradation of the drums increases the potential of the contaminating accident. The present practice of outdoor storage of radioactive wastes in a hurricane prone area (see Leonard G. Pardue affidavit, paragraph 3) is an abandonment of the ALARA principle. In view of the vast amounts of radioactive wastes that will be generated by the repairs and stored on site, the present practice of loose, outdoor storage is unreasonable.



FURTHER AFFIANT SAYETH NOT

Date: MAY 13th, 1981

Douglas King
Douglas King

STATE OF FLORIDA)
COUNTY OF DADE)


SS.

SWORN to and subscribed before me this

13th day of May, 1981.

Notary Public, State of Florida at Large
My Commission Expires October 11, 1982
Bonded thru Maynard Bonding Agency

Raymond D. King
Notary Public





STATEMENT OF PROFESSIONAL BACKGROUND AND QUALIFICATIONS

DOUGLAS KING

EDUCATION:

Bachelor of Science, Physics, 1971
The Cooper Union, New York City, New York

GRADUATE STUDIES:

Physics Department, Radiation Biophysics Department, 1971 - 1977
University of Florida, Gainesville, Florida

RESEARCH AREAS:

Nuclear Magnetic Resonance, Radiation Biophysics, Biological
Action of Ionizing Radiation, Cell Membrane Physiology, and
TLD Dosimetry

EMPLOYMENT:

1975 - 1977 Teaching Assistant, Physics Dept. Univ. of Florida
10/77 - 1/78 Biomedical Engineer, Univ. of Miami, Medical School
2/78 - 10/78 Radiation Health Physics Supervisor, Medi + Physics Inc.
11/78 - 5/81 Physics and Advanced Mathematics Teacher, The
Palmer School

MEMBERSHIPS AND HONORS:

Member of Sigma Pi Sigma, Physics National Honor Society
President of Sigma Pi Sigma, Univ. of Florida Chapter, 1976 - 1977
Member of United States Chess Federation, 1964 - 1980

