11/29/78 29 November 1978

Dear ASLB, 50-400/403

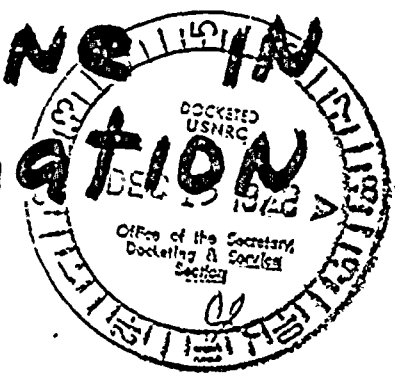
Reg. Filed.

Today I received a response to petition to intervene filed by Wells Eddleman and Kudzu Alliance. I reported on this response and other developments discussed on the phone with Charles Barth, NRC Staff Counsel, to the Kudzu Alliance General Meeting held at 7:30 tonight. (It is now 11:20 pm). Numerous Alliance members expressed concern that the Alliance should be allowed to intervene in this case. Also new information came to my attention.

I am writing to inform you of some facts relevant to points raised by Charles Barth in his filing urging denial of our request to intervene. Since we are not lawyers, we didn't know about these things when we filed and ask that the ASLB admit these facts expressed below (and any others we can supply within a reasonable time set by the ASLB) as part of the petitions to intervene by the Kudzu Alliance and by Wells Eddleman as an individual.

Enclosed is a copy of a statement signed by John P. Speights, now a Kudzu Alliance member. He states that he "requested to be intervenor around 1971. Was turned down. Was allowed to make limited appearance. (Is now member of the Kudzu Alliance)." Further "As I recall, the Chairman (of the Licensing Board) asked if the other intervenors couldn't represent some of my areas of concern. I said I would prefer to represent myself. (signed) John Speights 29 Nov. 1978" John Speights resides within 15 miles of the Shearon Harris plant site.

Material omitted deals with other current Kudzu members who say they tried to intervene in 1971. More information will follow.



I certify that the attached [illegible]

[illegible] Clappell, Notary November 30, 1978

My Commission Expires 11-12-79

Charles Barth states (p.3 of his response) that "no showing is made in the petition to intervene as to how the interests of Mr. Eddleman or the Kudzu Alliance could be affected by the proceedings." We feel to the contrary that every issue we have raised is relevant to CP & L's ability to manage a 4-reactor nuclear power plant in a safe, environmentally sound manner without unacceptable risk to public

health and private property. Rather than restate those concerns here, we add that the record of improper and unsafe activities by CP & L at Brunswick (to my personal knowledge from review of public documents) and perhaps also at H.B. Robinson #2, and the NRC's willingness to accommodate to these practices, as evidenced by allowing issues to remain unresolved without penalty to CP & L, acceptance of assurances that things had been done without independent checking by inspectors, and suppressing the concerns of inspector Floyd Cantrell, raise in our view risks to health, life, and property of everyone in the area of the plant and of all CP & L stockholders and bondholders. CP & L, with a rate base under $3 billion, proposes to invest $4.2 billion in the Harrisk nuclear plant alone. Most of this money will be paid by ratepaxxyers under Construction Work in Progress. CP & L chairperson Shearon Harris stated at the Shareholders Meeting of May 1978 that all costs of the plant would ultimately be paid by the ratepayers. Thus anyone who has electric service from CP & L is being forced to invest in a nuclear power plant owned by someone elase. If the plant is built they will then be forced to pay fixed profits on that plant, needed or not. We therefore appeal for reopening hearings on the need for power and the availability of alternative sources of energy and efficiency and conservation measures that could eliminate the need for this plant.

Kudzu Alliance and Wells Eddleman believe that our interests are vitally involved in CP & L's ability to safely manage a nuclear power plant. First, we suspect that there is no such thing as adequate safety for a nuclear plant within the actual performance of profitmaking corporations, government agencies, or other groups. If safe management does prove impossible, we as local residents will bear the health and genetic consequences; and as taxpayers and ratepayers we will bear the economic consequences. Since nuclear waste products are so terribly dangerous (see Gofman's "On the Way to the Bank" cited in my letter of 7 November) for example), we want to be assured that the most stringent and adequate plans to contain this waste in the plant and until final disposal (for which no adequate method has been demonstrated: see USGS Circular 779 and the IRG report) are made. We also vitally need to be assured that CP & L can and will carry out this very stringent nuclear waste containment program both in the operation of the plant and after the nuclear fuel is spent. We want to be assured that if waste disposal costs turn out to be very high (as the Congressional Report "Nuclear Power Costs" suggests) that CP & L can and will pay for adequate disposal, and not dump the waste on the taxpayers or charge the ratepayers for its error in judging the cost of nuclear waste disposal. I could go on for pages on this one point, as there are many other issues where nuclear plant management vitally affects us as residents near the plant and in other roles. But how can there be a clearer interest than knowing that only CP & L's safe management capability and the will to carry out that safe management will stand between us and the radioactivity of 3,600 Hiroshima atomic bombs, for the period 1986 until the Harris plants are completely decomissioned (2025?). You'll excuse us for thinking it might be better management not to create that waste and that risk in the first place, but if CP & L and the NRC are determined to create the thousands of tons of nuclear waste that this plant will produce, each ounce able to kill, injure or genetically damage many people, we what the very best assurance that you are going to do it safely. We cannot be sure unless we can cross-examine the witnesses, and call our own witnesses, and ask the questions that the power company surely will not raise itself concerning imperfect management, on an

issue where perfection to one part in 100,000 day in and day out for 50 years at the plant and perhaps 500,000 years at the waste dump is simply acceptable safety, and anything less may well be unacceptable.

We note a further issue concerning the credibility of CP & L and the NRC staff's ability to protect us from radiation. In the 1974 environmental statement for the Harris plant, it is said on page 3-17 that liquid radioactive emissions from normal operation would produce a 12.6 mrem per year per person dose at the plant boundary. Further, on page 3-22 it states that noble gas radioactive emissions will be less than 10 mrem per year, but that the dose to an infant's thyroid could be consideraly higher. The guideline for radiation dose to the public from all radioactive emissions at the plant boundary is 5 mrem per year. We are assured only that if everything works right, the emissions should be below 22.6 mrem per year and that state-of-the-art technology will be used to reduce these doses. Nevertheless, the (then-AEC) staff found 22.6 mrem per year"acceptable " Presumably the staff is not at risk from this radiation as they are several hundred miles from the source. Compare the situation of [redacted] If 4½ times the government guidelines is "acceptable" to the NRC still, what trust can people have that even the regulators (to say nothing of CP & L which cannot guarantee perfect operation because they are human) will protect them from excess radiation. NRC Staff have informed me that there are no penalties levied against plants that emit excessive radiation, though one could be shut down until it demonstrates that it has solved an excessive radiation emission problem). The EPA's funds for radiation monitoring have been cut (as has their staff for that purpose) every year from 1972 to 1978 according to reports in the Bulletin of the Atomic Scientists. And the General Accounting Office has called for aggressive NRC monitoring of nuclear plant construction, finding the current work wholly inadequate. Considering the badly belmished records of Daniel International and Research-Cottrell, contractors for CP & L's Harris nuclear plant, the lack of aggressive, independent NRC monitoring is very disturbing. How can we be sure CP & L is checking its contractors if the NRC isn't checking them adequately?

Obviously, safe radiation guidelines are required, safe plant construction is required, and radiation monitoring is required for safe operation of a large nuclear power plant. The Environmental Statement and GAO reports (CED 78-27 and others) mentioned above cast serious doubt on the verification of safe construction, safe radiation guidelines, and radiation monitoring, both by power companies and by the NRC and EPA. We want to raise these issues before the ASLB and to examine CP & L and NRC witnesses about them. Radiation at the rate of 22.6 mrem per year would yield 1 rem committed dose over 45 years. If the Mancuso-Stewart-Kneale results hold up, this 1 rem could double risk for several types of cancer, for people near the Harris plant if it operated perfectly. In reality, imperfect operation could mean a silent sentence to painful battles with cancer, and perhaps early death, to many residents near the plant. The specter of infant deaths from thyroid exposure to radiation, of stillbirths and retardation and genetic damage, is raised in other studies. We know the NRC has considered these points, but new evidence continues to come in, and the perfection of power plant safety necessary to avoid such damage is onerous indeed.

For example, Dr. Thomas Elleman, Chairperson of the Department of Nuclear Engineering at NC STate University, has told me that his discussions with other experts lead him to believe that lowering the worker exposure limits to 500 mrem per year could be "the death knell of the nuclear industry." Surely safe operation includes safety for employees. CP & L has won many safety awards, and we hope that they win all the prizes for nuclear safety (since that will mean we are better protected). But what if the worker exposure limits must belowered? Will we have to pay the cost if the nuclear plants just built with our CWIP money have to shut down? Or will workers be forced to be a suicide squad to save CP & L's stockholders and the power customers? Prudent planning will address such issues and have contingency plans ready. We hope the NRC and CP & L have such plans. We'd like to ask them about their plans and examine them. Since Dr. K.Z. Morgan has pointed out that extra genetic risk to workers will be distributed to all their descendants, even we who are not nuclear workers have a genetic interest in reducing the person-rem dose to the whole population, for the sake of our descendants who may inherit genes from nuclear workers.

Re "late" filing, we've already pointed out that Kudzu Alliance did not exist at the last opening for intervention, nor was Wells Eddleman resident in this area at that time. We also note that at least one person now a Kudzu member did try to intervene in 1971, hardly "sitting on by silently for six years" as Barth alleges.

We were not aware of the four factors listed in 10 CFP section 2.714a(1) (ii-v) as mentioned by Barth. We ask the ASLB to consider our initial addressing of these points here, since we were not informed by the NRC after our 16 October request for information on legal procedures for intervention, that these requirements existed. We still have, to my knowledge, nothing from the NRC on this question.

(1) Re "availability of other means whereby the petitioner's interest will be protected", without disparaging CCNC, the only active intervenors according to our understanding, we can say that CCNC is not raising all the questions we would like to, and certainly not cross-examining as we would like to, on many issues. CP & L and the NRC are our other means of protection, and we have cited above and on 7 November and 23 November several reasons why we are concerned that their protection of our interests, lives, health, etc, may not now be adequate. Kudzu Alliance we formed in part because the efforts of other groups opposing nuclear power were not deemed adequate by many people now members of Kudzu. We do not question others' efforts; but we wish to add our own. I, Wells Eddleman, have no reason to believe my interests are adequately protected by CP & L, the NRC, or even CCNC right now. The language is "will be protected" not "May be protected", so it is up to the NRC attorneys or CP & L to show what all our interests are and that CCNC is NOW protecting and will continue to protect them in the future, if they don't want us to intervene. We believe such a demonstration is impossible in logic and in fact, as who can even determine all our interests for us! Further, CP & L has interests of its own which would be compromised if it found our interests inadequately protected in the current situation; and the NRC staff may also wish to be our protectors rather than letting us protect ourselves.

Thus we feel that both CP & L and the NRC legal staff, having asked to keep us out of the proceedings, are biased judges of the protection our interests have. We feel they must show our interests are in fact protected by CCNC or others, in the face of our contentions about the inadequacy of others' protection. There is an old saying, "If you want something done right, do it yourself." Kudzu Alliance was formed to do for ourselves the living task of opposing nuclear power. For reasons cited above and other reasons, Kudzu Alliance and I do not believe our interests are being protected adequately by any others at present. We have no say in what CCNC attorneys ask, what witnesses they call. We have no ability to cross-examine witnesses. We think we have shown many reasons why we could make a positive contribution to the hearings' adequacy by raising and exploring issues, and by corr-examination. More reasons are given below.

(2) Re "the extent to which the petitioner's participation may reasonable be expected to assist in developing a sound record", we assume the ASLB is the one that must expect our participation to help develop a sound record. Since the NRC has ~~x~~ ruled a record developed without our participation unsound, we think we have a good case to make. Kudzu Alliance includes many individuals from all walks of life who are constantly interacting with others in their communities. We are thus informed of many things that go wrong in construction, or have been seen by local residents, or are known to people within CP & L who are afraid to try to change things through CP & L channels or through the NRC for fear of their jobs. We spoke to several such persons at the NC State Fair. Many would not give their names, but gave us information which might not otherwise be available to the ASLB. We can protect the anonymity of such sources securely and ask the ASLB to investigate points raised by these people.

Wells Eddleman is a working conservation manager and energy consultant, knowledgeable in general engineering, systems engineering, and energy issues, with access to many other knowledgeable professionals and lay persons. The greatest legal wizardry cannot of itself detect even elementary engineering or technical errors in highly technical testimony. But people with scientific training are more able to do so. Kudzu Alliance has several other members with professional experience in medicine, health, engineering and alternative energy sources, who can review documents and ask the tough questions that lead to full disclosure on the issues. Concerning management, several Kudzu members are independent businesspeople with ~~xxxx~~ practical experience in management; others, e.g. Wells Eddleman, have taken graduate management subjects. Both this practical and theoretical experience can be of value in assessing the real performance of management schemes that must be executed to an almost superhuman perfection to protect the public from nuclear radioactive pollution.

There is also the old principle that "two heads are better than one". Since CCNC is to our knowledge the only active intervenor, anything that slips by their lawyer or their experts is home free, even though it might be a dangerous error. The presence of other knowledgeable intervenors will reduce the likelihood of errors slipping by in this way. No one, not even CP & L, benefits from errors not being noticed, since when the errors are noticed later, hearings may be re-opened again or CP & L's license might be suspended or and operating license not granted. Considering that these hearings have to do with suppression of evidence, investigative experience will also be helpful. Many Kudzu members have such experience, e.g. Wells Eddleman who investigated the educational policies, history, dining policies, and CIA connections to MIT while he was a student there, as well as an investigation of General Motors policies.

Finally we note that we are not, on our own, expected to develop a sound record in the hearings, but only to assist. We believe our competence to assist is established by our experience and knowledge; our willingness to assist is evident; and the fact that some of the issues we raise (or even all) have already been considered should not bar our participation, since new evidence continues to come to light, and there are many questions that have not yet been asked about all issues; unless, like the death penalty, NRC decisions are all final, previous discussion of issues we raise should not be used to prevent us from raising such issues again where our points are new or different. We continue to do research on our own time, in addition to our regular work, and xxxxx we continue to find out things most North Carolinians are completely unaware of regarding CP & L, its contractors, its management policies, and nuclear power. For reasons cited above and below, we think we can assist in developing a more sound record for these nuclear power plants than has yet been developed.

(3)Re "the extent to which petitioner's interest will be represented by existing parties", as we have stated in (1) above, we do not feel the extent of others' representation of us (if any) is adequate now. We also note that one group of intervenors, named we believe Wake Environment, collapsed when a CP & L employee was elected vice president, automatically to become president the next year, xx so we are told. We cannot of our own initiative protect the Conservation Council of NC from ax similar fate. We note that strongly pro-nuclear people like Jerome Kohl of NC State University are active in the Sierra Club, also a prominent conservationist organization. We have no means (and would not wish to have means) to determine the leadership of CCNC or the Sierra Club. But that means we have no guarantee whatever that they will be abke to protect our interests after their next elections. Evidence has come to light that some power companies have infiltrated anti-nuclear organizations in Georgia and California. We cannot be sure it won't happen to CCNC.

The Kudzu Alliance as a separate organization would not exist had not its founders believed that CCNC as it is now had not done everything needful to represent their interests. While we endorse CCNC's efforts, our interest is to get all the facts out, a task we do not believe any single individual or organization can perform. Three intervenors can do a much better job than one; each can concentrate onx part of an issue that sne, he, or it is best able to address and backstop the others on other topics. Since we want the fullest possible checking on nuclear power plant licensing and procedures, we do not think the extent to which any one group can represent us is adequate. We ask to also represent ourselves so that we can do all we can to assure more adequate representation of our interests. Unfortunately, the burden of proof often seems to be on the intervenors, rather than on the applicant power companies as it should be. This gives us, in our view, even more reason to wish to defend ourselves from nuclear power. Axx court-appointed attorngy is xxxxxxxx far less adequate than one's own lawyer, judging by conviction rates we have heard of. & CCNCOs attorney can properly take no more interest in Kudzu or Eddleman than a court-appointed lawyer can take in a poor client among many clients. Since we feel a court- (or NRC- or CP&L+) appointed attorney won't help us much, and we can't yet afford our own lawyers, we'd like to defend ourselves, to participate directly within the legal rules. If it is objected that we aren't lawyers, we respond that we are able to follow instructions if we are told the procedures, and feel we have the same right to defend ourselves before the ASLB and NRC as we would in court. And if we try

something wrong, CP&L and the NRC's attorneys will be there to object and instruct us as they have already in this matter.

(4) Re "the extent to which the petitioner's participation will broaden the issues or delay the proceeding", we cannot say how much of the current delay from November until (according to Barth by phone) February, is due to us, if any of the delay is. We have nox wish to delay proceedings; rather, we'd like them speeded up so we can get our concerns before the hearings and xxxxx cross-examine witnesses and start planning what witnesses we want to call.

We believe there is some contradiction between developing an adequate record (which requires broad investigation at times) and not tending to broaden the issues or delay proceedings. It would be ridiculous if a prosecuting attorney, having presented a case, asked that the defense be forced to withdraw in silence as the case went to the jury, because the defense might introduce new issues, and their time taken up on defense would delay the verdict. Since construction on the Harris plant has not yet been suspended, there is no reason to believe that our participation will actually delay the plant (unless you begin to suspect that we're right about the plant not being needed, and its being a very expensive, job-destroying alternative as a source of energy). We believe that our tendency to broaden issues is a subjective judgement unless issues we have raised are cited as both within the jurisdiction of the ASLB and as not having been raised before. But if we have raised such issues and their are within the ASLB's authority to consider, our raising them is a case for our being made intervenors. If we have not raised new issues, but simply propose (as we have) to add our expertise and cross-examination and witnesses to the hearings, we are not broadening the issues but simply broadening the consideration of the issues, which we think will tend to make the hearing record more adequate. If we raise no new issues and won't do anything (which neither CP&L nor the NRC staff attorney seem to believe, since if we wouldn't do anything, why waste time opposing us?), then we would have no effect on the hearings and cause only a minor delay if we were admitted to intervention. But we do propose to participate with special knowledge and information, to assist existing intervenor in developing a full and complete record on issues vital to our lives and finances, of which CP & L's management ability is cleanly one.

Since the hearings have allegedly been postponed from November to February (3 months) we would have to do a lot of talking and take up a lot of the ASLB's time to add even 10% (9 days) to the current estimated delay in these hearings on a very complex issue. We do not believe that our participation will significantly delay the hearings beyond the delays necessitated for other reasons not of our doing, and we note that we have raised many issues for the purpose of general intervention, which we are also pursuing; our participation in hearings on CP & L's management capabilities will of course be on that issue. Our statement that we reserve the right to raise any topic (cited by Barth on page 4 of his response) is not an insult to the ASLB or a promise to raise irrelevancies, but merely an attempt to prevent our future participation as a general intervenor (we hope) from being limited to the specific set of concerns we first listed on 7 November. We hope this is understood and have no wish to offend anyone, only to protect our rights and acknowledge our inability to predict in advance all issues which we may learn of and which may be important to raise later in our interventions.

It may be true that "litigation has to end sometime," but we hope not before justice is done or adequate review of the facts developed. We are not proposing to re-do previous litigation, but to present further new facts and information on relevant issues as that information becomes available to us. We find it ironic in this respect that many groups have to resort to the Freedom of Information Act or press leaks to obtain important information about NRC practices such as current NRC chairpxxxerson Hendrie's long-suppressed letter which (excuse the language) proposes to ban a proposal to ban dynamic suppression systems, an important reactor safety feature than none of us had been told by GE, CP & L or anybody else was suspect. (CP & L has two GE BWR's at Brunswick, the plant Floyd Cantrell based his concerns about their management capability on.) We think that when new evidence comes to light, it should go into the record, just as new evidence can be introduced in an attempt to get a new trial. We do not presume that just because we bring a point up, full hearings will automatically be held on it; we may be led to assume the opposite from CP & L's and Barth's responses. We do contend that CP & L and the NRC staff may be less likely to bring certain matters embarrassing to them to the ASLB's attention than we would be. Once we have raised an issue, the ASLB can decide if it warrants rehearing or new hearings, or not. As stated above, many of the issues we have raised were raised because we have heard that legal rules we do not fully understand may limit us to evidence only on matters we have specifically listed in advance, so we list a lot of topics and "any other topic that may ...arise" to preserve what we would see as our right to be heard on issues that affect us. We do not feel we can mortgage our futures by foregoing our right to raise an issue that we have not yet thought of but which may vitally affect us later. Thus we say we would like to be able to raise any issue not for frivolous purposes, but to protect our rights. Whom can say definitively that all the possible ways of radiation release or health effects from radiation are yet known? This is only one example. As science and experience continue, many unexpected things are noted, some of which are significant. We wish to raise the new and significant problems found with nuclear power, since we are vitally concerned that it be made safe if it is made at all.

Barth states that we need not list contentions to be admitted as an intervenor. We find it difficult to state our concerns without listing issues which may be termed contentions. If we have shown sufficient interest, justification for our time of filing, and justificatio according to the four factors addressed above (any one of these 3 seeming to be sufficient to admit us since we were not here at the last opportunity to intervene), then we would like to make a list of contentions in the formal sense at that point, without prejudice to our future discovery of further issues of importance to be raised for consideration, or of further evidence on issues already raised. We would also like to know what legally constitutes a contention and how specific they are legally required to be, as is "safety" a contention, or "adequacy of ECCS" or "adequate containment of fission products" or do you have to list the exact things, and all of them, you think can and will go wrong?

Barth states that the work history and financial holdings of CP &L and NRC personnel are beyond the scope of the NRC's authority. We do not propose to bring people's finances or jobs under NRC's authority, but merely to reveal such relationships as are relevant to the credibility, expertise, and financial and other interests of witnesses

in the hearings. We believe that a person who gets their income from a party to the hearing, or who has worked for someone with a clear interest in an issue, has different credibility than a disinterested person whose income is from independent sources not party to the hearings. We would still like to explore that issue, since "money talks" and we would like to distinguish what people are saying and what their money is saying.

Finally, we ask the ASLB to bear with us in our ignorance of many legal requirements of which the NRC has not informed us except in its brief opposing us. We will do our best to present all the information required of us as soon as we know it is required, and ask that you consider our petition on the basis of all information submitted that is relevant, and that we still be allowed to amend our petition to provide any further information legally required from us in order to have the petition approved or at least considered on the facts and not on our legal ignorance. As citizens we feel we have a right to represent our selves and will do so as long as we can; we do not wish to cause you x inconvenience; please excuse our lack of experienced lawyers working fulltime (which the customers pay for for the power company and the government pays for --i.e. the taxpayers pay -- for the NRC). Most of us work full time and have some difficulty finding time to even research the legalities. We have believed our efforts best put into finding out information about nuclear power and CP & L and its planned Harris plant. Now we wish to use some of that information before the ASLB.

On behalf of myself and
The Kudzu Alliance,

Wells Eddleman

/Wells Eddleman

+ wife (and perhaps family)

John P Speights
2613 Van Dyke Ave
Raleigh, N.C. 27607
834-9251

requested to be intervenor around 1971. Was turned down. Was allowed to make limited appearance (is now member of the Kudzu Alliance.)

John P Speights

As I recall, the Chairman (of the Licensing Board) asked if the other intervenors couldn't represent some of my areas of concern. I said I would prefer to represent myself. JP Speights 29 Nov. 1978

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
CAROLINA POWER AND LIGHT COMPANY	)	Docket No.(s) 50-400
	)	50-401
(Shearon Harris Nuclear Power	)	50-402
Plant, Units 1, 2, 3, and 4)	)	50-403
	)	
	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document(s) upon each person designated on the official service list compiled by the Office of the Secretary of the Commission in this proceeding in accordance with the requirements of Section 2.712 of 10 CFR Part 2 - Rules of Practice, of the Nuclear Regulatory Commission's Rules and Regulations.

Dated at Washington, D.C. this
18th day of DEC 1978.

Peggy T. Dawkins
Office of the Secretary of the Commission

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
CAROLINA POWER AND LIGHT COMPANY	)	Docket No.(s) 50-400
	)	50-401
(Shearon-Harris Nuclear Power	)	50-402
Plants, Units 1-4)	)	50-403
	)	

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