

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

PUBLIC SERVICE ELECTRIC &
GAS COMPANY

(Salem Nuclear Generating
Station, Unit No. 2)

Docket No. 50-311
Proposed Issuance
of Operating License

AFFIDAVIT IN SUPPORT OF PETITION
SEEKING ISSUANCE OF AN ORDER TO SHOW CAUSE AND STAY LICENSING

1. I am fully familiar with all the statements contained in the attached Petition Seeking Issuance of an Order to Show Cause and Stay Licensing of Salem Unit No. 2. To the best of my knowledge, information and belief, the statements contained therein are true and accurate, submitted in good faith and not submitted for the purpose of delaying adjudication of this within proceeding.

2. My wife and I, together with our three children (ages 11, 14 and 18), live at 35 "K" Drive, Pennsville, New Jersey 08070, in a one-story ranch style house, which we own. Our home is located about ten miles north of the Salem Station, near the Delaware River. We have lived here for about six years, and have no present intention of moving.

3. I am employed by the Du Pont Corporation of Wilmington, Delaware, as a Distributor and Customer Service Supervisor with responsibilities for the sale and distribution of Du Pont paint products for international sales. I am a graduate of Rutgers University, where I majored in economics. Also, I am a

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licensed real estate salesman/broker and licensed insurance solicitor/broker in the State of New Jersey. I engage in real estate and insurance on a part-time basis, mostly in the Salem County area.

4. Our interests, together with the interests of others similarly situated, potentially are affected by Public Service Electric and Gas Company (the Licensee) application and the lack or failure of the Nuclear Regulatory Commission (NRC) to analyze information already known, will adversely affect our electric bills and create a needless economic hardship prematurely.

5. Our interests, together with the interests of others similarly situated, potentially are affected by the licensee's Amendment No. 42 due to the prospect, as yet undetermined, of increased daily exposure to radiation releases from a multi-nuclear facility, together with the risk of exposure to significantly higher levels in the event of design, construction, or operational errors in the proposed expansion. These interests also extend to our children, prospective grandchildren, together with friends and relatives who might be expected to visit with us.

6. Additionally, our interests, together with the interests of others similarly situated, potentially are affected by public recognition of hazards, real or suspected, regarding a multi-nuclear center and nuclear fuel storage at the Salem installation which reasonably could be expected to affect property values and business activity within the vicinity..

7. Finally, our interests, together with that of others similarly situated, cannot feasibly be protected in any reasonable manner, other than by our own active intervention and participation.

8. In conclusion, due to our close proximity to the facility, the potential hazards of normal or accidental releases of radiation to ourselves, our children, relatives, and friends, and the concurrent risk of adverse economic impacts, our health, safety, and welfare are affected by the licensee's application which is the subject of this proceeding.

Dated: August 2, 1979

Alfred C. Coleman Jr.
Alfred C. Coleman, Jr.

Eleanor G. Coleman
Eleanor G. Coleman

Sworn and Subscribed to before
me this second day of Aug, 1979

Jean A. McDonough

JEAN A. McDONOUGH -
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 20, 1981