

50-482

BEFORE THE NUCLEAR REGULATORY COMMISSION

In the Matter of:
WOLF CREEK POWER PLANT



PETITION TO SUSPEND CONSTRUCTION
AND REVOKE LICENSE

COMES NOW the Petitioner, the Kansas Building and Construction Trades Council, and requests that the Director of Nuclear Reactor Regulation, the Director of Nuclear Material Safety and Safeguards, or the Director of the Office of Inspection and Enforcement, as may be appropriate, institute a proceeding to suspend construction and revoke the construction permit issued for construction of the Wolf Creek Power Plant, Burlington, Kansas.

In support of this request, the Petitioner would show unto the Commission that the construction work on said power plant, especially the concrete work which forms the base mat for the reactor, as well as the containment vessel, is so sub-standard and inadequate that operation of the power plant would gravely endanger the public's health and safety; and, said danger can not be alleviated until the construction work, especially the concrete, is redone.

WHEREFORE, the Petitioner requests that the Director of Nuclear Reactor Regulation, the Director of Nuclear Material Safety and Safeguards, or the Director of the Office of Inspection and Enforcement, as may be appropriate, issue an order directed to the licensee and its contractors to show cause why construction should not be suspended and the construction permit should not be revoked.

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Respectfully submitted,

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