

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Iowa Socialist

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
COMMONWEALTH EDISON COMPANY,
et al.
(Carroll County Site)

Docket Nos.
S50-599
S50-600



SUPPLEMENT TO PETITION FOR LEAVE TO INTERVENE

In accordance with the order of the Atomic Safety and Licensing Board in the above captioned matter, the Iowa Socialist Party hereby enter a statement of their contentions with supporting basis for each.

1. In their Site Safety Report, the applicants have not demonstrated all the safety and environmental aspects of the site have been adequately met under the requirements of 10 CFR and the National Environmental Policy Act, in that:

- a. adverse effects on land use patterns in the area have not all been fully considered and detailed, such as,
 - (i) lack of safe and adequate roads in the site area for transportation to and from the site and for evacuation in the event of an on-site accident.
 - (ii) failure to adequately consider geological characteristics of the area such as the Plum River Fault.
- b. the economy of the area would be negatively impacted to a greater degree than described by the applicants, for example,
 - (i) greater loss in property values than described.
 - (ii) greater loss in productive capacity of the land than described.
 - (iii) greater impact on the local housing market than described.
- c. the siting of the plant would increase than likelihood of adverse effects on community characteristics of the area, for example,
 - (i) an increase in the likelihood of disease from low-level radiation effects would increase migration from the area.
 - (ii) people would move from the area in fear of an accident.
- d. adverse effects on crops, livestock, and other vegetation have not all been fully considered and detailed, such as,
 - (i) loss of productive capacity from low-level radiation.
 - (ii) risk of contamination in case of an accident.

2. The applicants have failed to meet the requirements of 10 CFR Part 51, 10 CFR Part 2, and the National Environmental Policy Act in their forecast for the need for power in the area and that the plant will supply by failing to consider fully the impact of conservation, alternative sources of energy and other factors decreasing demand.

3. The applicants have failed to show why the early site review should be approved at this time when,

- a. the future of commercial nuclear power is being debated in the political arena
- b. the full impact of the Three Mile Island Unit 2 accident has not been studied.
- c. the applicants have failed to show they are financially qualified to construct the facility.
- d. the applicants have failed to meet the requirements of the National Environmental Policy Act in not allowing full consideration and hearing on all factors, since some of these arise out of the construction permit process.

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