

JUN 10 1981

Staff that intervenors' contentions be more specific. This document is filed in accordance with an order that intervenor serve said contention in written form to all parties.

Intervenor alleges that the evacuation plan for Perry is fatally defective in numerous aspects and inadequately protects the safety of the public with respect to but not limited to various deficiencies. Many of the concerns deal directly with new information that was not available at the time of completion of the FSAR. This therefore allows for reexamination of the evacuation plan. 10 C.F.R. 51.21 and 51.23(e). This new information regards new research on the recalculation of the effects of nuclear radiation on people done by Dr. Edward Radford. (Pittsburgh Post Gazette, Scientist: Radiation Risks Higher, 5-16-81). Dr Radford believes that the probabilities for contracting any form of cancer after irradiation will be quadrupled. This information warrants reevaluation of the evacuation plan.

CONTENTION (evacuation plan)

Intervenor alleges that the evacuation plan for Perry is fatally defective in regard to but not limited to the following deficiencies; including the need for recalculation of all radiation standards and associated aspects of the plan.

1. Applicants' definition (2) of 'affected persons' is Deficient. (Vol. 16, Appendix 13A, p. 1-1).

- a. It does not state a specific criteria as to what constitutes the degree at which a person requires special attention.
 - b. This level is open for recalculation due to new information referenced beforehand.
 - c. It does not state how personnel decontamination of 'affected person' will be facilitated.
2. Applicants' definition (10) of 'Contaminated Area' is deficient. (Vol. 16, Appendix 13A, p.1-2).
 - a. Reference values regarding contamination levels must be recalibrated.
3. Applicants' definition (14) of 'Dose Projection' is deficient. (Vol. 16, Appendix 13A, p. 1-2).
 - a. The dose projection is calculated from an off-site monitoring program which only includes accumulative readout and is noncontinuous. Applicant should install off-site monitors with continuous readout of current ionizing radiation.
4. Applicants' definition (15) of 'Emergency Action Levels' is deficient. (Vol. 16, Appendix 13A, p. 1-3).
 - a. The threshold at which action is to be implemented must be recalculated in light of new information.
5. Applicants' definition (36) of 'Plume Exposure Pathway' is deficient. (Vol. 16, Appendix 13A, p. 1-5).
 - a. The pathway would have to be enlarged due to recalculation of radiation dose effects in light of

new information.

6. Applicants' definition (42) of 'Protective Action Guides' is deficient. (Vol. 16, Appendix 13A, p. 1-6).
 - a. The protective action guides would have to be recalculated in light of new information.
7. Applicants' 'Emergency Planning Zones' are deficient. (Vol. 16, Appendix 13A, Section 2.3, p. 2-2).
 - a. The first EPZ is compared with the plume exposure pathway. Since this aspect of the plan needs to be altered, the EPZ dimensions will have to be changed and enlarged.
 - b. The concern regarding the second EPZ is the ingestion pathway of Iodine 131 particulate fallout. Applicants' state that a monitoring program of crops, dairy cows, and farm animals would be necessary. Intervenor asserts that the human population should be included in the monitoring program since they will be ingesting affected food, be it garden vegetables or locally produced food products.
8. Applicants' 'Emergency Classifications' are defective. (Vol. 16, Appendix 13A, Section 3.3, p. 3-4).
 - a. The Alert Classification 2 includes a limited release of radioactive material. Further description of Alert Classification 2 makes no mention that the monitoring teams will be deployed. Applicants' should provide for this.

POOR ORIGINAL

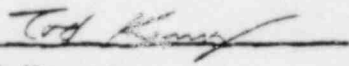
9. The Applicants should provide off-site readout of the current level of ionizing radiation with monitors that give instantaneous determination.
10. Applicant should provide for stockpiling of Potassium Iodide at the receiving hospitals, Lake County Memorial Hospital, East, Painsville, Ohio and The Radiation Medicine Center Hospital, University of Pennsylvania, Philadelphia, PA.. (Vol. 16, Appendix 13A, Section 5.5, p. 5-14).
11. Agreements with the local communities are not formally reached and therefore not binding so the evacuation plans are fatally defective.
12. Applicants make no provision for payment to local communities for planning or maintenance of the evacuation plans and therefore is defective.
13. Applicants may suffer financial difficulty and would therefore be hampered in safely operating the nuclear facility. A factor which would influence this would be the Muni Light anti-trust suit case.
14. Applicants' off-site radiological monitoring program is deficient. (Vol. 16, Appendix 13A, Section 7.4.8.2, p. 7-13). "The Computer will perform calculations that will determine the radioactivity concentration and dose to all sectors of the environment around the plant." By following the reference

POOR ORIGINAL

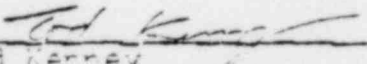
to table 7-4 the list of type of samples are given. The list includes air borne, surface water, drinking water, sediment, fish, and milk. The sampling of the human population is not indicated on the list. Since this is the ultimate concern it should be included amongst the sampling.

CERTIFICATE OF SERVICE

I hereby certify that copies of INTERVENOR'S AMENDED CONTENTION have been served on the following by deposit in the United States mail on this 8th day of June, 1981.


Tod Kenney

I hereby certify that copies of KENNEY ADDRESS CHANGE have been served on the following by deposit in the United States mail on this 8th day of June, 1981.


Tod Kenney

POOR ORIGINAL

Peter B. Bloch, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry R. Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Frederick J. Shon
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Jay Silberg, Esq.
Shaw, Pittman, Potts, Trowbridge & Madden
1800 M Street, N.W.
Washington, D.C. 20036

Donald T. Ezzone, Esq.
Assistant Prosecuting Attorney
105 Main Street
Lake County Administration Center
Painesville, Ohio 44077

Daniel D. Wilt
Wegman, Hesler & Vanderberg
7301 Chippewa Road, Suite 102
Brecksville, Ohio 44141

Terry Lodge, Esq.
Attorney for Applicants
915 Spitzer Building
Toledo, Ohio 43604

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

POOR ORIGINAL