

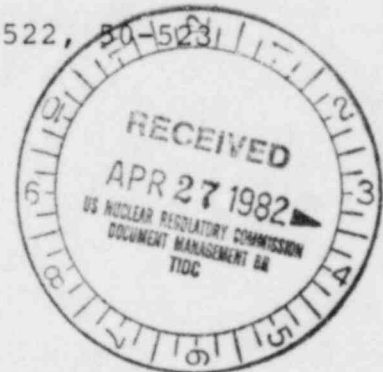
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter Of Puget Sound)
Power and Light, et al.)
Amended Application For Construction)
Permits and Facility Licenses,)
SKAGIT/HANFORD NUCLEAR PROJECT)

Docket Nos.

STN 50-522, 50-523



AMENDED PETITION TO INTERVENE

Pursuant to 10 C.F.R. § 2.714(a)(3) and in response to the Board's Order of April 5, 1982, the National Wildlife Federation and the Oregon Environmental Council jointly file this amended petition to intervene in the above-captioned proceedings. In support of this petition, petitioners would show the following:

I. NAME AND ADDRESS OF THE PERSON REPRESENTING PETITIONERS TO WHOM COMMUNICATIONS CONCERNING THIS PROJECT SHOULD BE ADDRESSED:

Terence L. Thatcher
Pacific Northwest Resources Center
Law Center, 1101 Kincaid
Eugene, Oregon 97403

II. NATURE OF PETITIONERS' INTEREST: EFFECT OF COMMISSION ACTION

National Wildlife Federation, 1412 Sixteenth St., N.W., Washington, D.C. 20036 (NWF), the nation's largest private conservation organization, is dedicated to the wise use and conservation of the nation's natural resources. Over 40,000 of its associate

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members live in the four-state Pacific Northwest region. In addition, NWF has affiliate organizations in each of the Northwest states: Idaho Wildlife Federation, Montana Wildlife Federation, Oregon Wildlife Federation, and Washington State Sportsmen's Council. Many of NWF's members live within fifty miles of the proposed project; their health and recreational interests could be adversely affected by construction and operation of the plants. Many other of NWF's members use and enjoy the natural resources that could potentially be affected by construction and operation of the Skagit/Hanford Plant, and, in particular, the Columbia River and its fish and wildlife resources, and live in the service districts of the sponsoring utilities.

Oregon Environmental Council (OEC), 2637 S.W. Water Street, Portland, Oregon 97201, is a broad-based coalition of groups and individuals, organized to protect the environment of the state of Oregon. Some of OEC's approximately 1900 members live within fifty miles of the proposed Skagit/Hanford Project; their health and safety interests could be adversely affected by construction and operation of the plants. Many of OEC's members also live in the Portland metropolitan area, use and enjoy the natural resources that could potentially be affected by construction and operation of the Skagit/Hanford Project and, in particular, the fish and wildlife resources of the Columbia River, and are served by the two Oregon-based sponsoring utilities.*

*/ The responsible officials of each petitioning organization have authorized this petition to intervene. In addition, the following individual members of petitioners have authorized NWF and [contd.]

Both NWF and OEC have interests under the National Environmental Policy Act, 42 U.S.C. §4321 et seq. and the Atomic Energy Act, 42 U.S.C. §2011 et seq., which they seek to protect through this intervention. See Calvert Cliffs' Coordinating Committee, Inc. v. United States A.E.C., 449 F.2d 1109 (D.C. Cir. 1971). Commission approval of the Skagit/Hanford Project application would significantly increase the chances that the project will be built and operated with the following impacts on petitioners' interests:

Construction and operation of the Skagit/Hanford Project will entail the risk of accidental release of fission products, which would adversely affect the health, safety, and recreational interests of NWF and OEC members living near or downwind or downriver from the plants. NWF members Willis and Ruth Hicks live within 33 air miles of the proposed nuclear plants; OEC member Doyle Hunt lives within 45 miles of the projects. Construction and operation of the plants will lead to expanded use of the Columbia River hydropower projects for peaking power, resulting in serious adverse impacts on the anadromous fish resources of the Columbia River. This would diminish the availability of fish to the many OEC and NWF members members who fish for Columbia River salmonids and steelhead trout,

[contd.] OEC to represent them in this matter. For NWF: Mr. and Mrs. Willis Hicks, 205 Fifth Avenue, Mabton, Washington 98925; Pearl Andersor, 1865 N.E. 129th Pl., Portland, Oregon 97230; Barbara Breunig, 14140 S.E. Rhone St., Portland, Oregon 97236; Lawrence L. Sowa, 17225 S.E. McLoughlin, Milwaukie, Oregon 97222. For OEC: Doyle Hunt, 1083 West Highland Ave., Hermiston, Oregon 97838; Charlotte Corkran, 130 N.W. 114th, Portland, Oregon 97229; Walter McMonies, 2321 S.W. Sherwood Dr., Portland, Oregon 97201; Marguerite Smyth, 6261 S.W. 47th Pl., Portland, Oregon 97221. Affidavits of these individual members will be shortly filed with the Commission to demonstrate their interests.

both for recreation and as a source of food. In particular, OEC members Charlotte Corkran, Walter McMonies, and Marguerite Smythe, and NWF members Pearl Anderson and Barbara Breunig use and enjoy the Columbia River fishery that would be adversely affected. Construction and operation of the Skagit/Hanford Project will increase the shipment of radioactive materials through the Pacific Northwest region, thus increasing the risks to the environmental necessities and amenities used and enjoyed by numbers of OEC and NWF. Operation of the Project will expand the volume of radioactive waste requiring storage in this nation, at a time when no satisfactory long-term storage arrangements have yet to be made, threatening the long-term health of the environment and petitioners' members' use thereof. Operation of the Project will increase the risk of catastrophic nuclear accident which could cause significant environmental damage and danger to the health of NWF and OEC members living near the Project and throughout the region. Finally, investment of billions of dollars in the construction and operation of the Skagit/Hanford plant will limit the funds available in the region for more environmentally acceptable and cost-effective energy alternatives, such as conservation, will unnecessarily and significantly increase the electrical rates of those of petitioners' members living within the service district of the sponsoring utilities, and could significantly increase the rates of all the Pacific Northwest members of NWF and OEC if the sponsoring utilities sold the output of the Project to the Bonneville Power Administration. All the individual members of NWF and OEC listed in this petition who have authorized NWF and OEC to represent their

interests purchase their electrical power from either Portland General Electric or Pacific Power and Light, two of the Project's co-sponsors.

III. SPECIFIC ASPECTS OF PROCEEDING AS TO WHICH PETITIONERS SEEK TO INTERVENE

Intervenors seek through their intervention to present evidence and legal arguments and conduct examination of applicants' experts to demonstrate the following:

(1) that the applicants have relied on an inflated calculation of the demand for electrical power in justifying pursuit of their license and have inaccurately calculated the impacts of delay or denial of the construction permit;

(2) that the applicants' benefit-cost analysis is fundamentally flawed by, among other things, use of misleadingly low estimates of the financial and environmental costs of the Project and by use of an inflated assumption of the Project's power availability and reliability benefits for the Region which, in fact, possesses significant, less-costly alternatives for providing the same or greater benefits.

(3) that there are cost-effective, environmentally preferable alternatives capable of meeting the energy demand which the Project is designed to serve even under the applicants' Project cost assumptions and that the availability of alternatives is even greater if more accurate Project cost figures are used;

(4) that acquisition of the Project by the Bonneville Power Administration pursuant to the Pacific Northwest Electric Power Planning and Conservation Act, P.L. 96-501, is highly unlikely, and

that inability of BPA to purchase the project is a central consideration in the decision to proceed or halt the project;

(5) that applicant has failed adequately to identify, discuss, and evaluate the significance of the environmental impacts of construction and operation of the plant, including, but not limited to, impacts on the fish and wildlife resources of the Columbia River, dangers of catastrophic accidents, either in fuel and waste transportation or in plant operation, and the impact on the economic and environmental viability of the project from the continuing problem of devising satisfactory long-term storage arrangements for nuclear waste material; that if those impacts are fully assessed the Project appears even less desirable when compared to available alternatives;

(6) that the Commission may not legally issue a permit or license for the proposed Project until adequate long-term nuclear waste storage facilities and procedures are established, or, at a minimum, until the conclusion of the Commission's on-going Waste Disposal Confidence proceedings; without establishment of those facilities, or, at least, without a favorable conclusion of the Waste Disposal Confidence proceedings, the Commission cannot find that it can reasonably be assured that the activities authorized by the license can be conducted without endangering the health and safety of the public, 10 C.F.R. § 50.35(a)(4) , nor can it fully assess the environmental impacts of those activities pursuant to NEPA.


IV. CONCLUSION

For all the foregoing reasons, petitioners National Wildlife

Federation and Oregon Environmental Council respectfully request that they be granted leave to intervene in this proceeding, with the right to have notice of and appear at all pre-hearing conferences and hearings that are held, and that they may introduce evidence and submit argument in support of their interests as outlined in this petition.

DATED this 20th day of April, 1982.

Respectfully submitted,

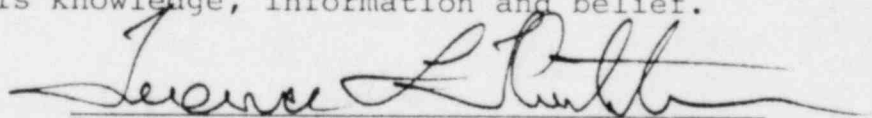


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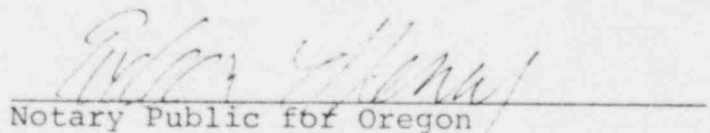
STATE OF OREGON)
) ss.
County of Lane)

Terence L. Thatcher, being first duly sworn, deposes and says that he is an attorney for National Wildlife Federation and Oregon Environmental Council; that he is authorized to make the foregoing Petition to Intervene; that he has read the same and knows the contents thereof and that all statements contained therein are true and correct to the best of his knowledge, information and belief.



Terence L. Thatcher

Subscribed and sworn to before me this 20th day of April, 1982.



Notary Public for Oregon

My Commission Expires: 1/7/83

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing
Petition to Intervene, together with Notice of Appearance, by mail,
postage prepaid, upon the following:

Executive Legal Director, Richard L. Black
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

F. Theodore Thomsen
Perkins, Coie, Stone, Olsen & Williams
1900 Washington Building
1325 Fourth Avenue
Seattle, Washington 98101

Coalition for Safe Power
Suite 527, Governor Building
408 S.W. Second Ave.
Portland, Oregon 97204

Dated this 20th day of April, 1982.



Terence L. Thatcher

Counsel for Petitioners