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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 )

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Docket Nos.  
STN 50-522, 50-523

SUPPLEMENT TO PETITION TO INTERVENE  
OF COLUMBIA RIVER INTER-TRIBAL  
FISH COMMISSION

Pursuant to Commission regulations, 10 C.F.R. § 2.714(b), petitioner Columbia River Inter-Tribal Fish Commission (CRITFC) submits this supplement to its petition to intervene. This filing lists the contentions which CRITFC wishes to litigate in this proceeding, along with specific bases for these contentions.

LIST OF CONTENTIONS AND BASES

1. Applicants Have Relied On An Inflated Calculation Of Demand For Electrical Power; Reliable Regional Energy Forecasts Demonstrate No Need for the Skagit/Hanford Project
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CRITFC herein incorporates by reference the contentions and bases filed by Natural Resources Defense Council (NRDC) on this matter.

2. There Are Cost-Effective, Environmentally Preferable Alternatives To The Project; The Environmental Report Is Inadequate In Its Discussion Of Those Alternatives
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CRITFC incorporates by reference the NRDC contentions.

3. The Applicant Has Used An Inaccurately Low Estimate On The Environmental And Financial Cost Of The Project In Its Benefit/Cost Ratio

CRITFC herein incorporates by reference the contentions and bases filed by the National Wildlife Federation and the Oregon Environmental Council on this matter.

4. The Applicants Have Failed To Assess Fully The Environmental Impacts Of Their Proposal And, In Particular, The Impacts of The Project On Columbia River Fish and Wildlife Resources

CRITFC herein incorporates by reference the contentions and bases filed by the National Wildlife Federation and the Oregon Environmental Council on this matter.

In addition CRITFC submits that the applicants have failed to fully assess the individual and cumulative environmental impacts associated with aquatic discharges of pollutants and radioactive materials resulting from operation of the proposed Skagit/Hanford Nuclear Project. Applicants state in their environmental report that an analysis of the chlorine plume indicates that all aquatic life passing through the plume will remain unharmed, Environmental Report at 5.3-2; that negligible increase in trace metal concentrations should not affect aquatic biota, Environmental Report at 5.3-2; radiation doses to biota from S/HNP effluents will be orders of magnitude less than doses experienced by biota from operation of Hanford plutonium production reactors, Environmental Report at 5.2-5; and, that temperature stresses could adversely affect salmonids due to increased vulnerability to toxicants which may be present, Environmental Report at 5.1-15. Further, the applicants state that since 1962, the local fall chinook spawning population has increased to an average of 20,000 fish, Environmental Report at 2.2-21. This information does not fully reflect potential environmental impacts including: those impacts which may result from the combined discharge of these and other pollutants; the toxic effects of radioactive material discharges, aside from those effects related to radioactive doses; the acute toxicity effects of pollutants within the mixing zone; the depressed

conditions of the local salmonid populations; and other relevant information regarding potential environmental impacts.

For these reasons, the construction and operation of applicant's facilities at the Hanford Reservation will substantially and adversely affect the Columbia River tribes in the exercise of rights reserved by those tribes in treaties with the United States. The construction and operation of the facilities will detrimentally affect the exercise of the tribes' treaty rights to fish at all their usual and accustomed fishing sites in common with citizens of the United States, as well as their exclusive right to fish in rivers and streams running through and bordering on their reservations. Further, construction and operation of the facilities will substantially and adversely affect the exercise by the tribes of their treaty-reserved right to hunt, gather roots and berries, and pasture their horses and cattle upon the lands ceded by those tribes to the United States. The aforementioned rights are secured to the Columbia River tribes by treaty and bind the United States and its successors in interest. Thus, construction and operation of the facilities will constitute violations of those treaties.

5. The Commission Should Not Issue Any Construction Permit Or Facility License For Skagit/Hanford Pending Completion Of The Water-Proposal Confidence Proceeding

CRITFC herein incorporates by reference the contentions and bases filed by the National Wildlife Federation and the Oregon Environmental Council on this matter.

Dated this 5th day of May, 1982.

Respectfully submitted,

*S. Timothy Wapab (S. Tim)*  
S. Timothy Wapab  
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Executive Director

STATE OF OREGON       )  
                              )  
County of Multnomah    )     SS.

S. Timothy Wapato, being first duly sworn, deposes and says that he is Executive Director of the Columbia River Inter-Tribal Fish Commission; 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 therein are true and correct to the best of his knowledge, information, and belief.

James R. Metcalf for S. Timothy Wapato  
S. TIMOTHY WAPATO

Subscribed and sworn to before me this 5<sup>th</sup> day of May, 1982.

Edward R. Cove  
Notary Public for Oregon

My commission expires 01-03-84