

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
JUN 6 1983

ATOMIC SAFETY AND LICENSING BOARD

Mr. John H. Frye III  
Judge M. Stanley Livingston  
Dr. Frank F. Hooper

\*83 JUN -6 P1:44

In the Matter of :  
: CINCINNATI GAS AND ELECTRIC : DOCKET NO. 50-358  
COMPANY, ET AL, :  
(William H. Zimmer Nuclear :  
Power Station) :

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AMICUS CURIAE BRIEF

Be it known that the Nuclear Study Committee of the Church of the Brethren, Southern Ohio District, supports the Miami Valley Power Project in its request for the re-opening of the licensing hearings relative to the operation of the Zimmer Nuclear Power Station, Clermont County, Ohio.

In the interest of the public health and safety of the residents of the communities surrounding the Zimmer Station, and in our concern relevant to the larger ethical issue of utility and government accountability, we cannot do other than to press for further hearings.

The following quotes and findings have contributed to our concern:

- 1) Representative Morris Udall, Chairman of the House Oversight Committee of the NRC, and the House Insular Affairs Committee, "Zimmer is a model case of how not to build a nuclear power plant;"

2) Mr. Victor Gilinsky, NRC, "In my experience I don't think we've run into one plant where the gaps in Quality Assurance are as large as we've got at Zimmer;"

3) Nuclear Regulatory Commission Staff, "...one of five plants in the U.S. with a systematic breakdown of the Quality Assurance program;"

4) past history of the Region III Commission reveals a cover-up of an emergency at the Davis Besse Nuclear Power Station, which had it been known, would have prevented the accident at the Three Mile Island Nuclear Station. This same Commission plans to license the Zimmer Nuclear Power Station under questionable circumstances;

5) the Miami Valley Power Project has uncovered acts of malfeasance by the primary agencies involved in construction; and

6) according to the wind wheel studies (siting data) of this plant, radioactive releases, whether routine or large, would spread over well populated areas. Emergency evacuation of the population in any orderly fashion within a safe time would be impossible.

Our goal is not to embarrass or punish or fine the primary agencies involved, but to support those changes which will assure the health, safety and well-being of the residents of the community.

Velma M. Shearer

Velma M. Shearer, Chairperson  
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6987 Union Road  
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Ted Powell

Ted Powell, Member  
Nuclear Study Committee

Gene Kraus

Gene Kraus, Member  
Nuclear Study Committee

(This does not represent the support of the Board, Southern Ohio District, as they have not had time to review and vote on this document. An action will be taken on June 7, 1983.).

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "Request to File an Amicus Curiae  
Brief" and the "Amicus Curiae Brief"

\_\_\_\_\_ in the above-captioned proceeding have  
been served on the following persons by posting the same in the U.S. Mails, post-  
age prepaid, this 3rd day of June, 1983.

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\*Served through internal  
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*Ted Powell*  
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Ted Powell, Member  
Nuclear Study Committee

*Gene Kraus*  
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