

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 JAN 12 10:03

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
)
WASHINGTON PUBLIC POWER SUPPLY SYSTEM) Docket No. 50-5080L
)
(WPPSS Nuclear Project No. 3))

INTERVENOR'S FURTHER SUPPLEMENT TO PETITION FOR LEAVE TO
INTERVENE, DATED JANUARY 10, 1984

Pursuant to Memorandum and Order of the Licensing Board in the above-captioned case, dated December 6, 1983, the Coalition for Safe Power (Coalition) hereby submits the information required by the Atomic Safety and Licensing Appeal Board Order of November 15, 1983 (ALAB-747) vacating a portion of the Licensing Board's April 21, 1983 Order granting the Coalition's untimely petition for leave to intervene. The Coalition asserted in its original Petition that it would make a valuable contribution to the proceeding as required by factor three of 10 CFR 2.714(a); the Appeals Board remanded the matter, requiring a further showing by the Coalition.

The Coalition had stated that it had a former WPPSS worker who would participate in the proceeding and was in the process of identifying other expert witnesses in the areas of radiation, health physics, geology, seismology, hydrology, engineering, fisheries and nuclear safety. Petition at 7, 8. In its brief on the appeal, the Coalition further clarified that the former WPPSS worker was Stuart Sandler. Intervenor's Answer to Applicant's Appeal, dated October 27, 1983 at 7. The Answer also named several other consultant/witnesses and potential witnesses.

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Answer at 7, 8, 9. This information is incorporated by reference as supplemental information in support of the Petition. As explained therein, retention of witnesses requiring substantial fees has not occurred due to the construction halt at the project.

If the proceeding goes forward, the Coalition intends to call the following witnesses:

1. Stuart Sandler of Portland, Oregon, to support accepted contention Nos. 11 & 12, admitted by Licensing Board Order dated September 27, 1983. Mr. Sandler is a welding engineer, educated at Ohio State University with experience in nuclear construction sites, including WPPSS Nuclear Project No. 2, and certified by the American Welding Society in SMAW and GMAW processes. Mr. Sandler is an expert in matters of quality assurance of welding, in particular the assurance that applicable codes and standards are incorporated in welding and quality assurance procedures. Mr. Sandler will review (for the purpose of assisting in the preparation of cross-examination as well as direct testimony) the procedures utilized at WNP-3 for welding and welding inspection and will testify on whether industry standards have been used. Mr. Sandler will also review QA/QC and NRC inspection documents and testify on the quality of weldments at the project.

2. Jack Smith, PhD of Portland, Oregon, to support accepted contention No. 16. Dr. Smith is an aquatic toxicologist with graduate degrees from Harvard University. Dr. Smith has broad experience with analysis of discharges into waterways, the control of chemical pollutants and the ecological impacts. Dr.

Smith acted as a consultant to the Coalition, providing the primary research for contention 16, as stated therein. Dr. Smith's initial review of the Applicant's application and NRC Staff review documents is summarized as follows:

The tolerance levels used by the Applicant (Environmental Report Sections 5.1 and 5.3) for a variety of fish and other aquatic organisms are with one exception lethal limits. The concept of sublethal but still damaging temperatures or chemical concentrations is ignored. Similarly, the concept of synergistic impacts of the present combination of individually toxic substances is ignored. In table 5.3-1 either the average or the maximum projected mixing zone concentrations of the heavy metals are in excess of EPA water quality criteria with the maximum projected discharge levels of nickel in excess of either the EPA Water Quality Criteria or the WNP-3 NPDES permit. The actual situation may be far worse than reflected in the table due to use of improper ambient concentrations. Furthermore, if the duration of the low flow condition is expected to be on the order of 7 days (see footnote page 5.3-1) the situation represented as maximum would more nearly in fact become average during this period. Also in table 5.3-1, the maximum chlorine concentration is projected to be 2.5 times greater than the EPA Water Quality Criteria of 0.002 ppm.

Dechlorinization of cooling water blowdown is to be achieved by reduction with sulfur dioxide. While the effects of sulfate resulting from this reaction are discussed, those of the more toxic sulfite are ignored, assuming unrealistically that all the sulfur dioxide will be consumed in the reduction. While it is stated (pg. 5.1-6) that "during normal plant operation, little or no nutrients will be added and no effect on the aquatic ecosystem will occur" phosphorous concentrations in the river will be increased significantly. A relatively well documented phosphorous threshold for slowly flowing waters is 0.05 ppm and since the phytoplankton population in the Chehalis River is already reported to be dominated by blue green algae (pg. 5.1-3) which do not require nitrogen for metabolism the additional phosphorous would be expected to result in additional growth of these algae. These are some of the significant water quality and aquatic biology conflicts which have not yet been resolved.

The information provided in this supplement, including references to the Answer filed by the Coalition on October 27, 1983, is in no way a representation of the Coalition's entire case. The Coalition reserves the right to expand on the scope of the testimony of the above-named experts, to utilize additional

experts and to base its case in part on cross-examination and other trial procedures.

Respectfully submitted,

Dated this day, the 10th
of January, 1984

A handwritten signature in cursive script, appearing to read "Nina Bell", written over a horizontal dashed line.

Nina Bell, Staff Intervenor

UNITED STATES OF AMERICA DOCUMENT
NUCLEAR REGULATORY COMMISSION

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM)

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OFFICE OF SECRETARY
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CERTIFICATE OF SERVICE

I hereby certify that copies of "INTERVENOR'S FURTHER SUPPLEMENT TO PETITION FOR LEAVE TO INTERVENE, DATED JANUARY 10, 1984" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, postage prepaid, this 10th of January, 1984.

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