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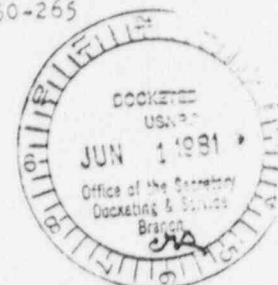
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF COMMONWEALTH  
EDISON CO. QUAD-CITIES STATION,  
Units 1 and 2

Amendments to Facility  
Operating License Nos.  
DPR-29 and DPR-30

(Increase Spent Fuel Storage  
Capacity)

Docket Nos. 50-254  
50-265



PETITION FOR LEAVE TO INTERVENE

The members of Citizens for Safe Energy (hereinafter CSE) hereby moves the United States Nuclear Regulatory Commission (hereinafter the "Commission") for leave to intervene with respect to the Commission's consideration of the request of Commonwealth Edison Company (hereinafter "Licensee") for a modification to the spent fuel storage pool of the Quad-Cities Nuclear Generating Station Units No. 1 and 2 and for concurrent issuances of amendments to the Facility Operating License.

Citizens for Safe Energy consists of 210 members which reside in the area around the Quad-Cities Generating Station.

CSE requests that the Commission grant a hearing on this proposed amendment and that CSE and any other interested individuals and organizations be allowed to participate fully in such proceedings.

CSE further requests that the Commission prepare an Environmental Impact Statement.

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INTEREST OF CITIZENS FOR SAFE ENERGY

— CSE members have a substantial interest in the Licensee's request in that:

The Quad-Cities Nuclear Station is located in the area in which we live, work, and own property.

CSE has an interest in the storage of additional radioactive spent fuel at the Quad-Cities site which may create a hazard to this area. The Licensee's proposed license revision was not considered during the licensing proceedings for the Quad-Cities Plant nor was it considered in the Final Safety Analysis Report (FSAR) for the Quad-Cities Plant. The proposed modification in the operation of the spent fuel

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pool differs significantly from the method of operation treated in the PSAR for the Quad-Cities plant. Thus CUE has an interest in a full examination of the proposed license revision to ensure that public health and safety will be protected.

The technical information submitted by the Licensee in support of its amendment request is presently inadequate to assess all the effects of proposed action on the area, inasmuch as the Licensee's application and supporting documentation for modification to the spent fuel storage pools does not indicate the ultimate effects of storing large amounts of spent fuel for long undetermined time periods.

Grant of the proposed amendment to expand spent fuel storage capacity would contradict existing NRC policy in that it would undermine the effect of the developing generic EIS regarding the permanent and preferred disposition of spent fuel.

The amendment request and supporting documentation do not address all alternatives for managing the spent fuel problem in the short term.

The licensee has not explored the alternative of curtailing present output from the Quad-Cities station either in conjunction with energy conservation and pricing alternatives which would result in a reduction of demand or in conjunction with increasing the use of under utilized fossil fuel plants to meet current demand.

The licensee has made no showing that it will be financially capable of meeting the costs of eventual disposal of the spent fuel wastes which it intends to store in the expanded spent fuel pool.

The licensee should be required to provide a fund or security to cover costs of waste disposal.

The licensee should be required to provide a fund for reimbursement over and above that which the Price Anderson Act allows in order to compensate area citizens who may be affected by a nuclear accident caused by the release of radiation from the spent fuel.

The licensee should be required to submit cost evaluations for handling, transportation, storage, disposal and permanent surveillance of excess spent fuel.

The licensee should clarify the monitoring system that is used and its range of sensitivity.

The amendment request by the Licensee does not adequately discuss the amount of radioactive materials omitted including a definition of negligible, the procedure by which negligible amounts of radioactivity are quantified, methods of detecting a loss of neutron material and swelling of stainless steel rods in storage racks.

The licensee should also discuss procedures to monitor ground water movement in the vicinity of the plant for leakage from spent fuel pool.

The application and supporting documentation inadequately discuss the ramifications of changing the rack configurations in a pool where damaged fuel is stored.

There has been insufficient consideration of potential occupational hazards to workers installing racks.

The licensee should discuss the effects of damaged fuel on a pool containing addition fuel elements in compacted racks.

Licensee should discuss possible hazards and credible accidents involving release of additional radiation, chemicals and/or solid objects such as sections of cladding and fuel rods from the defective fuel stored in the pool.

There has been insufficient consideration of the hazards from exposure to workers to increased radiation when workers perform routine maintenance and/or special functions necessary to contain excess radiation emanating from damaged spent fuel.

The application and supporting documentation inadequately discuss the Quality Assurance programs regarding the integrity of the compacted racks and fuel baskets prior to installation and use.

The application and supporting documentation inadequately discuss inspection procedures necessary to detect defects in the compacted racks and baskets.

#### RESERVATIONS

As these contentions are in part based upon documents which may be superseded, modified, or supplemented before or during a hearing on this matter, CSE respectfully reserves the right to modify, amend, add or delete contentions.

Further CSE asks that the Commission act upon its Petition in expedient manner and that the Commission decide whether to grant the relief requested in this Petition before any further consideration of or action on the Licensee's request for a license amendment concerning Quad-Cities Generating Station, either by the Staff or the Commission, prior to the Commission's action on this Petition shall be considered a denial of this Petition and final agency action subject to judicial review. CSE further requests that it be given prompt notice of any action taken by the Commission or the Staff on the Licensee's request to amend its license concerning the expansion of spent fuel storage at

the Quad-Cities Nuclear Plant by contacting CSE either by telephone or telegram, on the day such action is taken.

Respectfully submitted

Citizens for Safe Energy

BY:

Marilyn Bos

Marilyn Bos  
secretary

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CERTIFICATE OF SERVICE

I, Marilyn Bos, hereby certify that I have this 28th day of May, 1981 served copies of the foregoing Petition for Leave to Intervene on each of the following persons by depositing same in envelopes addressed to said persons, first class, postage prepaid, and depositing with the U.S. Postal Office at 108 Butzer St. Hillsdale, Illinois 61757.

Secretary of the Commission  
United States Nuclear Regulatory  
Commission  
Washington, D.C. Docketing  
and Service Section

Executive Legal Director  
United States Nuclear Regulatory  
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