

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the matter of)	
LONG ISLAND LIGHTING COMPANY)	Docket No. 50-322-OL-3
(Shoreham Nuclear Power Station)	(Emergency Planning)
Unit 1))	

MOTION TO INTERVENE
ON BEHALF OF THE RESIDENTS OF NASSAU COUNTY

We the Long Island Coalition For Safe Living ("COALITION") hereby petition as intervenors to be heard before the Atomic Energy and Licensing Board on the use of the Nassau County Veterans Memorial Coliseum in the LILCO evacuation plan as part of the reopening of the record with regard to the Coliseum.

The "COALITION" requests the right to intervene and participate in the reopened proceedings to present testimony and other evidence as to why the Coliseum should not be used in the LILCO evacuation plan in the event of a nuclear accident at the Shoreham Nuclear Power Station.

BACKGROUND:

The Long Island Coalition for Safe Living is a coalition of some of the groups in Nassau County who are concerned with the health and well being of the residents of Nassau County as well as Suffolk County. They are:

Peoples Action Coalition
Long Island Rate Payers Association

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Concerned Mothers of Nassau
Safe Energy Alliance of Long Island
PeaceSmith House
Mothers Alliance for Peace
Long Island Progressive Coalition
Long Island Citizens in Action
Nurses Environmental Health Watch
N.Y. Community Action Network
North Shore Coalition for Safe Energy
Women Opposed to the Nuclear Threat
Long Island Network for Peace and Justice

The residents of Nassau County began to feel the threat of the Shoreham Nuclear Power Station when Mr. Purcell offered the Coliseum as a decontamination center in the LILCO evacuation plan. We began to organize and participate in educational programs with civic, health and community organizations. Out of this experience came the conviction of not only the "COALITION" but of the residents of Nassau County that the opening of Shoreham poses a great danger to our health and well being.

We intend to show cause for the withdrawal of the Coliseum from the LILCO evacuation plan.

We are herewith presenting briefly two issues which should compel the N.R.C. to disqualify the use of the Coliseum as part of the LILCO evacuation plan.

ISSUES:

1. The Nassau County Board of Supervisors never approved the use of the Coliseum as part of the LILCO evacuation plan in the event of a nuclear accident at Shoreham.
2. The use of the Coliseum as a radiation decontamination center poses great danger and harm to the residents of Nassau County.

ARGUMENT:

1. When the Long Island Coalition For Safe Living appeared before the Nassau County Board of Supervisors on 3/11/85 we challenged them to remove the Coliseum from the illegal LILCO evacuation plan. Mr. F. Purcell, Nassau County Executive declared that the Coliseum was not part of any plan. He said his offer of help was merely a humanitarian reply. Mr. Suozzi, Mayor of Glen Cove, Long Island and Member of the Nassau County Board of Supervisors said that the Board never agreed that the Coliseum could be used by LILCO in their evacuation plan(attachment 1). Mrs Hannah Komanoff, also a member of the Nassau County Board of Supervisors has taken the same position(attachment 2). Both have sent letters to the Atomic Energy and Licensing Board to this effect and their public statements at the Board meeting are on record at the Nassau County Board of Supervisors. LILCO misrepresents the facts when it includes the use of the Coliseum in their evacuation plan. LILCO, therefore, has a "void" in the record for an acceptable evacuation plan.

2. In the event of a nuclear accident at the Shoreham Nuclear Power Plant, the majority of the 150,000 people in the 10 mile evacuation zone and others totaling more than 500,000 (LILCO estimate)

are expected to drive some 40 miles to the Coliseum where their cars will be washed down. The water run off from washing down contaminated cars will seep into the water supply in the Uniondale, N.Y. area. There is no catch basin lining in the designated parking fields as would be required in any "wash-down" zone.

The people are then supposed to be monitored, checked for radioactivity then showered and sent to congregate care centers (52 schools). The Coliseum is inadequate for this process since there are only thirty one showers available for the more than 150,000 people.

We also question the capability and the equipment to detect all forms of radioactive contaminants including transuranics. We also believe that there will not be sufficient accommodations for the "sick" people who will be showing their first signs of radiation poisoning.

Many of the 52 schools named as congregate care centers do not accept their designated participation in the LILCO evacuation plan and have removed themselves leaving few or no congregate care centers.

The people of Nassau County are entitled to an independent study showing that there will be no harm to them. We must be assured that:

1. If radiation gases escape the Shoreham

Nuclear Power Plant they will not "reach" the people of Nassau County.

2. The evacuation of at least 150,000 people can be orderly and safe.

3. The quantity of water used to decontaminate the victims will not seriously diminish our resources.

4. The water from the decontamination process will not contaminate our ground water supply.

5. No radioactive contaminants will remain in any building used as a decontamination or congregate center or along the evacuation route.

The Long Island Coalition for Safe Living asserts that LILCO or the NRC cannot assure the residents of Nassau County that they will be safe and that since no Department of Environmental Conservation impact study has occurred, the Coliseum should be removed from the LILCO evacuation plan.

While it has been determined that the carrying out of this LILCO plan by LILCO is illegal, we wish to state and get a ruling saying that the carrying out of this plan for the health and safety of both the victims of Suffolk County and the residents of Nassau County would be impossible by ANY OFFICIAL BODY.

Submitted by:

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May 21, 1985