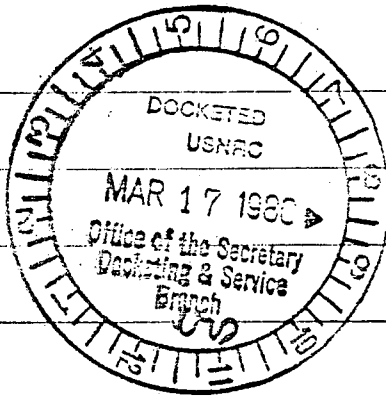


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GERALD A. NAVRATIL
438 W. 116 ST. Apt 41
NY, NY 10027
MARCH 7, 1980

SAMUEL J. CHILK

UNITED STATES NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

DEAR MR. CHILK:

I WISH TO FILE MY COMMENTS ON THE
FEB. 11, 1980 DIRECTOR'S DECISION REGARDING THE
INDIAN POINT NUCLEAR FACILITY. I HAVE
EXAMINED THE DIRECTOR'S DECISION AND FIND THE
CASE FOR CONTINUING OPERATION OF UNITS 2
AND 3, SUBJECT TO COMPLETION OF CERTAIN
SAFETY SYSTEM MODIFICATIONS, QUITE CONVINCING.
I THEREFORE RECOMMEND THAT THE COMMISSION
REVIEW AND SUPPORT THE DIRECTOR'S DECISION.

WITH REGARDS TO THE COMMISSION UNDERTAKING
A COMPREHENSIVE STUDY OF SOCIETAL RISKS
OF NUCLEAR POWER PLANTS LOCATED IN HIGH
POPULATION DENSITY AREAS, I WOULD ADVISE

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AGAINST SUCH A STUDY. SINCE THERE ARE CURRENTLY ONLY FOUR SUCH PLANTS IN OPERATION AND I DOUBT THERE ARE ANY PLANS TO LICENSE ADDITIONAL PLANTS IN AREAS OF HIGH POPULATION DENSITY, THE STUDY WOULD NECESSARILY BE OF LITTLE VALUE UNLESS THE COMMISSION ANTICIPATED THE NEED TO LICENSE SUCH FACILITIES IN THE FUTURE.

WITH REGARDS TO THE EXISTING FOUR PLANTS, ZION 1 AND 2 AND INDIAN POINT 2 AND 3, IT WOULD APPEAR THAT CONTINUED OPERATION OF THESE PLANTS SHOULD BE CONTINGENT ON INCREASED SAFETY REQUIREMENTS TO OFFSET THE LARGER [BUT STILL INFINITESIMAL] RISK ASSOCIATED WITH THEIR LOCATION. IN ASSESSING THE RISK ASSOCIATED WITH SUCH PLANTS, AS WAS REQUESTED BY THE UCS PETITION OF SEPT. 17, 1979, THE COMMISSION AND ITS STAFF SHOULD RE-EXAMINE THE QUESTION OF WHETHER OR NOT A ⁶⁶ "CORE MELTDOWN WITH BREACH OF CONTAINMENT" ²² IS A CREDIBLE DESIGN BASIS OCCURRENCE IN AN OPERATING PLANT. PARTICULARLY,

IN VIEW OF THE FACT THAT THE KENNEDY COMMISSION TECHNICAL STAFF ANALYSIS REPORT ON ALTERNATIVE EVENT SEQUENCES INDICATED THAT A COMPLETE CORE MELTDOWN WOULD NOT VIOLATE THE CONTAINMENT, HYDROGEN PRODUCED BY 100% OF THE ZIRCONIUM REACTING WITH WATER AND DETONATING WOULD NOT PRODUCE SUFFICIENT FORCE TO RUPTURE THE CONTAINMENT, AND FINALLY, THAT IF THE CONTAINMENT SHOULD SOMEHOW BE VIOLATED, THE RELEASE OF AIRBORNE RADIONUCLIDES WOULD BE SUBSTANTIALLY LOWER THAN EARLIER ESTIMATES (WASH-1400). ALTHOUGH THESE CONCLUSIONS ARE ONLY VALID FOR TMI, THEY SUGGEST THAT SUCH AN ANALYSIS MAY BE USEFUL FOR THE ZION AND INDIAN POINT UNITS.

ADDITIONALLY, ANY RISK-ASSESSMENT SHOULD INCLUDE AN ESTIMATE OF THE INCREASED SOCIETAL RISK OF SHUTTING THESE FOUR UNITS DOWN. IN NY CITY THERE HAVE BEEN TWO POWER BLACKOUTS COVERING THE ENTIRE CITY IN THE LAST 20 YEARS WITH LARGE SCALE PROPERTY DAMAGE AND GENERAL LAWLESSNESS. CLEARLY THE LOSS OF 2000 MWe OF LOCAL POWER WOULD

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MAKE NY CITY MORE DEPENDENT ON REMOTE
POWER SOURCES AND RISE AN INCREASED
LIKELY HOOD OF A REPEAT OF THE 1977
BLACKOUT.

I APOLOGIZE FOR NOT TYPING THIS
LETTER BUT THE FILING TIME LIMIT
PRECLUDES IT.

SINCERELY,

Gerald A. Navratil

GERALD A. NAVRATIL