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AUTHON AFFILIATION

INGERSOLL, A.C. California, Univ. of, Los Angeles

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July 1, 1981

Office of the Secretary Nuclear Regulatory Commission Washington, D.C. 20555

RE: NRC Docket No. 50-361-OL

Dear Mr. Secretary:

I am writing to the Commission in support of licensing San Onofre Nuclear Generating Station Units 2 and 3. I am not able to attend the Atomic Safety and Licensing Board hearings July 11 in San Clemente and I am taking this method of communicating what I would say if I could attend:

Members of the Board and guests, ladies and gentlemen -- It is symbolic and altogether fitting that we meet in a high school today. Few would disagree with the premise that our nation's best hope for the future lies in the education of our youth. What they learn today in schools like this will shape their attitudes toward life, work, leisure, and the whole gamut of value systems which determine the decisions they will make as citizens and voters tomorrow, that is, the decisions they will make if they have any choices.

It is about tomorrow's choices that I want to speak. Depending on the outcome of these hearings, and others like them that will doubtless stretch well into the future, our children can have two radically different future environments as far as choice is concerned. If the forces in opposition to the licensing of San Onofre Units 2 and 3 prevail today — and if they show no change of attitude in later hearings of this kind — then one can predict a rather bleak future for today's children of San Diego County, with few options to choose from when they become tomorrow's voters.

San Diego, losing once when Sun Desert was turned down two years ago and now a second time, may just give up on nuclear power. Indeed what prudent investor would wish to put his money into a project with such a slender chance of the necessary public acceptance to become operational? In practical terms this means that San Diego is locked into fossil fueled generation of electric power for something like the next couple of decades, in other words until there comes a real revolution in public opinion. Only now are we seeing a substantial turn-around in the public attitude toward social welfare, and we are almost a half-century away from the great depression when it all started. Public attitudes toward nuclear power may change more rapidly than this, but I would not predict a revolutionary change in less than one decade — which is a standard period for political revolutions — and probably not in less than two.

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San Diego already has the second highest electricity rates in the nation. It is on the edge of economic peril, as businesses seek to relocate in other areas in order to secure lower electric rates. I understand that Rohr Industries is one such firm. Just one year ago San Diego Gas & Electric Company stated, "SDG&E plans to rely principally on nuclear, geothermal and coal power sources to combat the foreign oil problem."

More than half of this reliance (which included coal-fired power purchased from Arizona and New Mexico and geothermal power purchased from Mexico) was to come from nuclear power, San Onofre Units 2 and 3. Now the matter will have to be reconsidered altogether. Unless one is in the utility business one can scarcely comprehend the increase in cost of fuel oil over the last decade. We who drive cars know that gasoline prices have increased perhaps 5-fold in the last 10 years. Refined fuel oil, on the other hand, has increased from \$2 a barrel in 1970 to \$37 in 1980, a factor of eighteen and a half, or almost four times the rate of increase for gasoline!

I am not predicting a famine in San Diego, with widespread starvation, collapse of social institutions, etc. I am only stating that choices will be limited without nuclear power in the next two decades or so; there will be fewer choices as to jobs, housing, recreation, education — all the good things of life — because so much of the community's resources will be consumed in paying for fossil fuels (or for the heavy investments required for alternative energy sources such as solar and wind).

Let us imagine the other scenario now, that the Licensing Board senses public acceptance of nuclear power and, together with their assessment that San Onofre Units 2 and 3 can be operated safely, agree to go ahead with the licensing. I would then predict that this region would ultimately have power at rates roughly comparable to those in Sacramento, which city is supplied by Rancho Seco Nuclear Generating Station. These rates are about half what I pay in Los Angeles and I am told that my rates are about half those in San Diego. While utility rates are not ordinarily a high percentage of an individual homeowner's expense (compared to the mortgage, for example) they are enormously important to any business enterprise and will easily make the difference between locating or relocating in one region or another.

With lower electric rates, San Diego will retain and attract the industry that it needs to provide the options that tomorrow's citizens will want, a wide range of choices in life and living.

"But", say the anti-nuclear protesters, "we don't believe nuclear power is safe. You told us nuclear power made for cleaner air than fossil fuel power and all that, and that it could not harm us.....and then came Three Mile Island! We love our children and we don't want them to grow up having to survive a nuclear disaster that lays waste the land for miles around, rendering it a desert for a century or more!"

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True, there was Three Mile Island but I would ask you this: Have you ever heard, before TMI, of a \$2-billion accident without a single loss of life or injury? San Onofre has been built to accommodate a whole new bundle of regulations growing out of Three Mile Island. Throughout history man learns from experience, and a part of experience involves accidents. There is the risk of accident in everything we do, every minute of the day, and the risk of a nuclear power accident resulting in injury or death is extremely small, as you have doubtless heard.

On behalf of my colleagues in the engineering profession, I would leave you with this thought. While we argue these points in the hearing today, other countries are moving ahead rapidly with the development of nuclear power. France is now more than one-third supplied with nuclear power and moving toward one half. Taiwan, an island a quarter the area of my home state of Wisconsin, has had two nuclear power plants in operation since 1978, is constructing two more, and has another two more on order. People in these other countries know all about Three Mile Island, and they have confidence in nuclear power. Do they care less for their land than you do? Do they love their children less than you do? I hope you agree with me that they do not. I believe rather that they know from their past experience what it means to live with limited options. They are choosing nuclear energy now as the best way they know to give them more and better choices in the future.

I thank the Board for the opportunity to share these thoughts with you today.

Sincerely,

Officed Congarroll
Alfred C. Ingersoll, P.E.

Associate Dean, Continuing Education
National Director, California Society of

Professional Engineers

President, California Engineering
Foundation

ACI: jb