

REQUEST FOR INSTITUTION OF PROCEEDINGS TO REVOKE OPERATING LICENSE, 10 CFR 2.206

TO: Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission

As a concerned and interested resident of Southern California, who may be adversely affected by the unit's continued operating, I Margaret Ann Higgins, request the Director of Nuclear Reactor Regulation to initiate a proceeding pursuant to 10 CFR 2.202 and 10 CFR 55.40 for the purpose of suspending or revoking the operating license for the San Onofre Nuclear Generating Station Unit One.

New and relevant information is now available on potential ground motions at the site in the event of an earthquake, and this information would have warranted the Commission to have refused to grant a license on the original application. Furthermore, the plant is located midway between Los Angeles and San Diego, one of the most densely populated and fastest growing areas in the country.

Unit I is not designed to withstand possible ground motions from earthquakes on the Newport-Inglewood and Christianitos faults and their branches which pass close to the reactor. These ground motions could break cooling water pipes, cause a loss of coolant accident, and lead to a meltdown of the fuel rods. The addition of a concrete shell to the reactor dome and other modifications are inadequate to insure against damages from possible ground motions during a maximum possible earthquake. The new and relevant information regarding ground motion potential was unavailable when the AEC approved the design criteria of Unit I or later when the NRC approved structural changes to the unit. Seismic design criteria for Unit I was based on inadequate data on measurements of ground motions close to the source of the earthquakes. Recent California earthquakes near Santa Barbara in August, 1978, near San Jose in August, 1979, and in Imperial Valley in October, 1979, have revealed new and relevant information about ground motions that was not available to the NRC for determining seismic design criteria for Unit I.

Because population growth near the San Onofre plant has been more rapid and extensive than could have been anticipated during the licensing of Unit I, there are no adequate evacuation plans for the area's residents in the event of a loss of coolant accident. Approximately nine million people live in the area that could be affected by the accidental release of radioactive gases from Unit I. The State and local governments are not prepared to evacuate the population within the short time between the accident and the spread of radioactive gases. When the AEC issued the construction permit in March of 1964, it was impossible to know the population of the region would increase so rapidly.

For the above reasons, and the associated risks to the health and safety of the people of Southern California, it is imperative that you take action to suspend or revoke the operating license for San Onofre Nuclear Generating Station Unit I.

Signed on this date, November 11, 1979.

Margaret Ann Higgins
(signature)

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(street address)

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(city, state, zip code)

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INSTRUCTIONS FOR MAKING A REQUEST FOR ACTION

To make the request this must be mailed to the:

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission, Washington, D.C. 20555

It should be hand-addressed. The person making the request must fill in their name near the top of the other side, signing their name at the bottom and filling in the other requested information.

This is not merely another petition indicating your opposition to nuclear power or the San Onofre plant or abstractly calling on the government to curb nuclear power. This request will require the Director of Nuclear Reactor Regulation to either institute the requested proceedings or to inform each requesting individual why no proceedings were instituted. If proceedings are instituted, it does not mean Unit I will be closed, but that the license holder will have to adequately respond and tell why the operating license should not be suspended or revoked, or face a hearing on the issue. If there is a hearing, the license holder must bear the burden of showing why the operating license should not be suspended or revoked. The hearing on the issue would also permit testimony from parties whose interests might be affected by the decision. Nuclear power plants have actually had their operating licenses revoked in the past as a result of this procedure.

Under the federal regulations governing nuclear power plants, any person has the right to make the request. If the request is ignored, or treated in an arbitrary manner, the requesting party may go to federal court to compel action on the request.

Do not sign this request unless you are actually willing to stand by all that is stated. You may be responsible for providing further information to support your request and should be willing to do so.