

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 Jerry Querson, 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, Nov 12th, 1979.

Jerry Querson
(signature)

243 Walnut
(street address)

Newport Bch CA
(city, state, zip code)

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