U.S. Nuclear Regulatory Commission 1717 H Street, N.W., 11th Floor Washington, D.C. 20555

> Nunzio J. Palladino, Chairman Victor Gilinsky, Commissioner Peter A. Bradford, Commissioner John A. Ahearne, Commissioner

July 10, 1981

Gentlemen:

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It has been over a year and a half since the Kemeny and Rogovin Commissions published their sharp criticism of the Nuclear Regulatory Commission's (NRC) approach to regulating nuclear power. Investigating the accident at Three Mile Island, both groups concluded that the NRC's attitude of promoting nuclear energy and protecting the nuclear industry had had a negative impact on public safety.

Despite these strong indictments, however, the NRC has returned to the same "business as usual" attitude that characterized its pre-TMI behavior. Perhaps nowhere is this attitude more obvious than in the case of the San Onofre atomic facility, to which I would like to call your attention.

The San Onofre Nuclear Generating Station (SONGS) is situated in a seismically volatile and densely populated area of Southern California, making it among the most ill-conceived and dangerous nuclear power plants in America. Yet, the NRC's Atomic Safety and Licensing Board (ASLB) continues to push ahead in its efforts to license San Onofre Units II and III, while ignoring the extremely serious safety issues surrounding the continued operation of Unit I:

- San Onofre Unit I has been identified as having the <u>highest probability</u> of a meltdown of any reactor in California, according to a study prepared by Science Applications, Inc., for the California Office of Emergency Services.
- 2) The Newport-Ingelwood Fault, only four miles offshore, is capable of a 7.5 magnitude earthquake, according to the U.S. Geological Survey. A 7.5 magnitude quake is ten times greater than the 6.5 magnitude quake that San Onofre Units II and III are theoretically capable of withstanding. By comparison, Unit I is designed only to withstand a 5.0 magnitude seismic event!

3) Half the population of California would be affected by a serious accident at San Onofre. 10-12 million people live within 100 miles of the plant.

- 4) No workable or demonstrated evacuation plan exists for even the immediate 10 miles surrounding the plant. Typically, 25,000 people populate the San Onofre State Beach during the summer months. These people would be stranded in the event of a serious accident, because the only evacuation road passes right by the plant.
- 5) A June review by the Federal Emergency Management Agency (FEMA) concluded that the demonstration of the evacuation planning is "woefully inadequate." By the NRC's own reckoning (NUREG-0490) a meltdown accident at San Onofre could cause up to 130,000 acute deaths, and another 300,000 latent fatalities. Property damages, according to Science Applications, Inc., could be as high as \$180 billion.

New seismic information, unavailable in 1969 when Unit I was licensed, underscores the gravity of the situation. In 1980, a new fault zone, the Christianitos Zone of Deformation (CZD) was discovered and mapped by the U.S. Geological Survey at the request of the NRC. Traces of both this fault and the Newport-Ingelwood fault pass precipitously close to the plant. Had this information been known in 1969, it is doubtful that the AEC could or would have licensed the Unit I reactor.

Furthermore, the Unit I reactor is plagued with very serious safety problems. In operation over 13 years, it was shut down in April, 1980 due to severe leakage and corrosion in its steam generators. Pacific Gas and Electric claims that the damage has been corrected through the use of an unprecedented plugging and sleeving process, but even the NRC admits that the \$67 million operation was "highly experimental." This means that Unit I is not only externally incapable of withstanding a serious quake produced by the Newport-Ingelwood fault, but that internally it is highly susceptible to any major ground motion. These conditions, in such a densely populated area, are clearly intolerable.

It is time for the NRC to live up to its legal, as well as moral, responsibility, which is quite simply to regulate nuclear power in order to protect public health and safety. The circumstances that led to the licensing of Unit I in 1969 are no longer applicable today. New seismic dangers have been uncovered, the population has grown at an astounding rate, and the reactor's equipment is deteriorating. An operating license, once issued, is not an inalienable right that cannot be revoked. Instead, it is like a driver's license, which is granted by the NRC under certain conditions, and is subject to periodic review and possible revocation.

I urgently request that the commissioners initiate a license review for San Onofre Nuclear Generating Station Unit I, and that, until such time as a review has been completed, operation of Unit I be suspended. Over 1,500 concerned residents of Southern California have petitioned the Director of Nuclear Reactor Regulation of the NRC between 1979-1980 to initiate proceedings 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 I. They have not, as yet, received a reply. Given the gravity of the issues surrounding the facility in question and in accordance with the petitioners, I respectfully request prompt action be taken to address these crucial matters. Failure by the NRC to take action will not only confirm the widespread suspicion that the agency has failed to correct its mistakes of the past, but more importantly, will endanger the security of millions of people living in Southern California.

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Sincerely,

Ralph Noder

Ralph Nader

cc: Gov. Jerry Brown

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WIST FOR INSTITUTION OF PROCHIDINGS TO REVOKE OPERATING LICENSE, 10 CFR.2.206

10: Director of Nuclear Reactor Fegulation 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 <u>southerne</u>, <u>nonstitut</u>, 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 rnia earthquakes near Santa Barbara in August, 1978, near San Jose in August, 1979, A Imperial Valley in October, 1979, have revealed new and relevant information about Ca and ground motions that was not available to the NRC for determining seismic design criteria for Unit I. The Livermore earthquake of January 1980 made seismic focussing an issue relevant to San Onofre's earthquake hazards.

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. The Rogovin report to the NRC on Three Mile Island accident reccommended that old reactors near major cities (like San Onofre) should be shutdown until Evacuation Plans are realistic.

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 coerating license for San Onofre Nuclear Generating Station Unit I. /

Signed on this date, <u>Man 1</u>, 1980 <u>Spelvere (signature)</u> (signature) <u>7.305 <u>Austran</u> <u>Secu</u> (mailing address) <u>Man Jule Lea.</u> 9, 208 (city, state, zip code)</u>

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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, 11 - 14 - 79, 1979. Asu-(bignature) 12882 Dunas (street address) 11 Please!! Santa Ana, CALIF. (city, state, zip code) 92705 Save CaliFornia I will support this Request Fully Mank you