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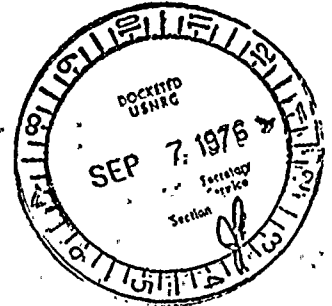
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Re: Dockets 50-275-OL
50-323-OL

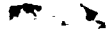


Dear Mrs. Bowers:

Without intending to give the matter more emphasis than it deserves, I believe the "limited reply" attached to the Center for Law in the Public Interest letter dated August 20, 1976 in turn deserves a limited response.

Power generation from a nuclear plant, as with fossil plants, is "interrupted" regularly every year for about a month for refueling and maintenance, and at other times by forced outages which can be caused by a number of things. The possibility that an earthquake, whether more or less severe than the magnitude for which the plant is "designed", could cause some increase in the plant's forced outage time, and thus some increase in the total plant outage time, is hardly a reason for selecting one possible cause of outage as a cost-benefit issue. If the Intervenor would review the operating history of power plants of all kinds, in all countries, they would find that even in "high seismicity" areas the contribution to total plant outage from seismic events is insignificant compared to other sources of planned and forced outage. This relative contribution to outage time is the key factor in determining whether "seismic" outage is a significant cost-benefit issue.

With regard to the alleged "ECCS deficiencies", Intervenor again ignore the probability factor in their judgment. The ECCS is not even called upon to function except in the case of rare events. Large seismic events are among the others for which the ECCS may need to function, although the "Reactor Safety Study" (WASH-1400) concluded that "... earthquake-induced accidents should not contribute significantly to reactor accident risks." This conclusion was firmly founded



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on a risk analysis which included the possibility of seismic events significantly more severe than those for which a plant was designed. The risk analysis and conclusions in the "Reactor Safety Study" included the contribution of possible failures of the ECCS caused by seismic events. Thus, the low probability of this type of event means it has little significance in the cost-benefit analysis.

Regardless of the validity of these conclusions, however, the cost-benefit analysis involved in a NEPA evaluation is properly focused on realistic evaluations of expected events, not on speculative, worst case postulations of very rare events. (cf. NRDC, Inc. v. Morton, 458 F 2d 827 (1972) (D.C. Cir.)) While seismic events as severe or more severe than those for which the plant is designed (as properly established and certified in the plant safety review and hearings) might be postulated, their contribution to the cost-benefit balance is negligible.

With regard to Contention 4 of the Intervenor, the contention deals only with the adequacy of the evaluation in the FES of the costs attributable to the effects of radiation releases, not the probability or identification of the causes of such releases. The suggestion that because a seismic event is one of the possible causes of releases the whole seismic question is involved is misleading and erroneous.

The "limited reply" also listed two new environmental contentions. Evidently, they are to be presented later, so PGandE will respond to them at that time.

Very truly yours,

Philip A. Crane, Jr.

CC: ASLB
Parties



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