

August 3, 1979

DOCKET NUMBER

14

PETITION RULE PRM-56-23 (44FR 32486)

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

Attention: Docketing and Service Branch

Dear Sir:

Having reviewed the Critical Mass Energy Project petition for rulemaking, notice of which appeared in the Federal Register, Volume 44, Number 110 dated June 6, 1979, I urge that the Commission deny said petition.

There are many reasons why I feel this petition should be denied. A similar petition was denied by the Commission 7 July 1977. Events subsequent to July 1977 have not provided substantial reasons to reverse this denial.

Actual public evacuation drills in addition to the many legal questions raised, would impose a higher probability of accidental death or injury on the public. Cost of such drills to the public, to merchants and industry, and to government, would not be commensurate with the marginal benefits achieved. To think that the utilities would or even could bear these costs without passing them on to the consumer is naive.

We have extensive experience in Florida with public distribution of emergency plans. At one time we had DOD funding contracts to prepare and distribute emergency information to counties in threat areas. This was done using many different dissemination systems, all with the same results. The effort was largely wasted because people did not retain the information. Finally, we prepared camera-ready materials and have them ready for rapid distribution in the event of an emergency. This system works well and is far less expensive. Adopting this approach to the electronic media and to the newspapers would prove to be more effective than annual or semi-annual distribution of emergency information by the utility.

As for the petitioners request for a system of offsite radiation detectors, this is already deployed in Florida and operated by the Florida Division of Health within the existing low population zone. To provide this same capability to 50 miles would not only be inordinately expensive, it would very likely not be capable of furnishing the desired information. I feel there will be time enough to deploy mobile monitoring teams once the parameters of a release are determined. We will



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Acknowledged by card... dlh... 8/13/79

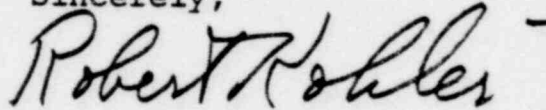
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then have definitive radiological information upon which we can base any effective countermeasures that might be needed.

In closing, I feel that the Commission, the states, and the industry have done a superlative job in making nuclear power the safest, least harmful to the environment and cheapest commercial power available. It is past time for this endeavor to stand proudly on its record and mount a campaign to counter the continuous diet of anti-nuclear programming broadcast to the public by the media.

Sincerely,

A handwritten signature in cursive script that reads "Robert Kohler". The signature is written in dark ink and is positioned above the typed name and title.

Robert Kohler
RADEF/Shelter Coordinator

RK/em