

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of)
WESTINGHOUSE ELECTRIC CORP.) Docket No. 110-0495
(Exports to the Philippines)) Application No. XR-120
) Application No. XCOM-0013
) (Application No. XSNM-1437)
)

BRIEF OF INTERVENOR/PETITIONER
FRIENDS OF THE FILIPINO PEOPLE

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INTRODUCTION AND MOTION TO INTERVENE

An export license application requested by the Westinghouse Electric Corporation for the purpose of exporting nuclear material to the Philippines in connection with the proposed Westinghouse nuclear reactor, sought to be constructed in the Philippines is presently pending determination before the Nuclear Regulatory Commission.

In addition, the Commission, by Order of October 19, 1979, invited submissions from participants and interested individuals and groups on various procedural questions and on the scope of the Commission's foreign health, safety and environmental jurisdiction.

The Friends of the Filipino People, which had informed the Commission on October 10, 1979 of its intention to do so, does therefore hereby move to intervene and fully participate in this Westinghouse license application matter and does herewith submit this brief in support of its position on the issues before the Commission.

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IDENTIFICATION OF PETITIONER

The Friends of the Filipino People is a non-profit organization incorporated in Washington, D. C. Its purpose is to spread information about the Philippines and the policy of the U.S. government towards the Philippines, and to bring such information to the attention of the people of this country, so that they may make enlightened decisions affecting our government's relations with the Philippines.

Since the organization's aim is to reach the majority of the people of the United States its membership tends to reflect that varied majority, with a strong representation from Filipinos and those of Filipino family connections. It has chapters in some twenty cities and towns and a national office located in the United Methodist Building, 100 Maryland Avenue, N.E., Washington, D. C. 20002, telephone 543-1093.

The Friends of the Filipino People engages in a program of independent and non-partisan research on questions of the Philippines and U. S. - Philippine relations. It conducts seminars, lectures, and public meetings; its members have appeared on TV and radio. It publishes a quarterly bulletin and numerous pieces of educational material in book, brochure, and leaflet form.

Representatives of the Friends of the Filipino People have testified on numerous occasions before Congressional committees, and on occasion before state legislatures.

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INTEREST OF THE FRIENDS OF THE FILIPINO PEOPLE

The Friends of the Filipino People believe that the interests of the people of the United States are best served by a policy of friendship and non-intervention towards the Philippines and its people, as is reflected in the organization's four points of programmatic unity.

Broadly interpreted these four points express support for a U. S. policy towards the Philippines that will allow the Philippine people to determine their own destiny without interference from this country. For this reason the four points express opposition to any policies of the U. S. government that support the suppression of human rights in the Philippines. The organization concurs in the judgement of Amnesty International and the International Commission of Jurists, as well as the U.S. State Department, that the present government of Ferdinand Marcos is in violation of the human rights of the Filipino people.

Relating to human rights in the full sense of the term, our four points of unity also express criticism of the economic policies of U.S. corporate or multi-national organizations in so far as they tend to despoil the Philippine people of their natural resources, or in so far as they aggravate or take advantage of Philippine poverty and underdevelopment by means of below subsistence wages or support for anti-labor policies.

In the most striking way the proposed Westinghouse nuclear reactor ties many of our organization's concerns and interests together. Sponsored by a Philippine government that violates human rights, the Westinghouse

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project's political viability is related to and dependent upon the suppression of free speech, press, right of assembly and other democratic rights in the Philippines. Safety hazards, occasioned by Westinghouse, a U. S. multinational, threaten the lives and destinies of many, many Filipinos in the Manila and Bataan areas adjacent to the proposed reactor. The project represents a clear example of multi-national profit-making at the risk of the Philippine people and without consideration for their true development needs. Moreover the U.S. Executive and State Department apparently support the project despite its obvious connection with a repressive Philippine government and a reprehensible corporate policy.

Our programmatic position that the best interests of the Filipino and U. S. peoples are connected is illustrated very plainly by this reactor. There are several thousand U.S. servicemen and their families located at Subic Naval Base and Clark Air Force Base, both within an area that would be endangered by any accident that might occur at the proposed Bataan reactor. Our organization believes that the interests of both Filipino and U.S. peoples would be served by a withdrawal of these two U.S. military bases, constituting as they do particularly flagrant examples of U. S. intervention in Philippine affairs. Meanwhile, as long as these bases remain, the Friends of the Filipino People believes that the U.S. personnel must not be endangered by the proposed reactor, any more than should be Filipino lives in the same area.

Besides U.S. citizens who support human rights and the need for a more democratic and non-interventionist foreign policy, members of the

Friends of the Filipino People include persons who for business, professional, or other reasons have spent time in the Philippines or have a special interest in that country. Ties of family, friendship, business and professional association bind some members of the Friends of the Filipino People to citizens of that country. Indeed some of our members or associates own properties or homes in the area of the projected nuclear plant, or have relatives or friends who do. It is obvious that for such members it is a matter of interest that the projected nuclear plant might have incalculable effects on the lives and homes of friends, associates, or families and on their own homes and properties in some cases. These concerns, needless to say, have been immeasurably deepened by the Three Mile Island accident. Based on the above the Friends of the Filipino People submits that it has standing in this matter. Crowley v. Seaborg, 312 F.Supp. 1205 (D.C. Colo. 1970).

ARGUMENT

For the reasons set forth below, the Friends of the Filipino People submit: 1.) that the Nuclear Regulatory Commission has both the authority and obligation to examine the health, safety and environmental impacts of the proposed Westinghouse nuclear reactor in reaching its licensing determination; 2.) that these issues must be examined on their own merits as they relate to the Philippines and the Filipino people and not only as they may be connected with the U. S. national security and common defense;

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3.) that because of the officially recognized repressive nature of the present government in the Philippines and the corrupt history of this proposed Westinghouse nuclear reactor, the examination and consideration of these issues must utilize the same criteria and reflect the same concern for the Philippines and for the Filipino people as if the application were for a domestic license, and; 4.) that hearings should be held in this matter which are comprehensive, public and with the full participation of both proponents and opponents of the license herein sought.^{1/}

In addition, it is the position of the Friends of the Filipino People that the export license sought by the Westinghouse Corporation must be denied. Because our positions on the ultimate licensing issue before the Commission is interrelated with our reasons for our positions on the jurisdictional and procedural questions, posed by the Commission's Order of October 19, 1979, they will appear together below.

1) The proposed Westinghouse reactor is unsafe as planned.

A. Volcanism. The proposed reactor is to be located on the slope of Mount Natib, a Philippine volcano. According to the report of the

^{1/} Particular attention is directed to the comprehensive affidavit of William Lindsley Cummings, appended hereto, which is referred to on numerous occasions in the above argument. Mr. Cummings, a Ph.D. candidate in Ecology, spent several years in the Philippines working with both U.S. and Philippine personnel on the proposed Westinghouse nuclear reactor. His affidavit is a remarkable document supportive of the arguments made herein, but capable of standing on its own as an indictment and inside expose of the Westinghouse license applications. Mr. Cummings is available for further participation before the Commission in its decision making process in this matter. Also appended hereto is the affidavit of D. Boone Schirmer, National Coordinator of the Friends of the Filipino People. Mr. Schirmer is also available for further participation in this matter.

International Atomic Energy Agency of July 1978 the eruption of Mount Natib is a "credible event." (p. 12). This same report clearly states that

The Napot site (proposed for the reactor is unique to the nuclear industry in so far as the risk associated with the eruption of nearby volcanoes. The only modern plant which is designed to account for volcanic eruption is the Pebble Spring Plant in the U. S. This plant is located 128 kilometers (80 miles) from the nearest volcano and, consequently, only ash fallout is a consideration. At the Napot Point site, the nearest volcano is 9 kilometers (6 miles) away. Therefore the question of volcanic eruption deserves extremely careful consideration at this site. (p. 7).

The Report goes on to say that "the hazards associated with such eruption, for example, ash fall, impact of volcanic ejects, glowing avalanches, overflowing gas ash emulsions and gas accumulation, as well as laharc mudflow, should be taken into account" (p. 7).

B. Earthquakes. The same International Atomic Energy Agency report also states that the earthquake dangers at Napot Point have been underestimated. The report states that greater magnitude earthquakes, closer to the reactor site than previously projected, are possible. This is especially true of an earthquake of magnitude 8 Richter scale which can occur 50 to 70 kilometers from the site as "opposed to the magnitude event 7.9 postulated by the applicant [Westinghouse] to occur at a distance of 100 kilometers from the site" (p. 3).

Thus the IAEA report indicates that the site is likely to experience a quake more severe than the plant is designed to withstand. An earthquake of magnitude 8 could produce up and down ground waves at the site

with 50% of the force of gravity (.5g). The plant is only designed to withstand ground vibration up to 40% of gravity (.4g). Rupture of the pipes connecting elements of the plant could lead rapidly to a core meltdown (Nuclear Export Monitor, Center for Development Policy, Washington, D. C., vol. 1, #2, p. 6).

C. Radioactive gas release to Manila and U. S. bases. A meteorological study commissioned by the Center for Development Policy of Washington, D. C., finds that there is a 37% likelihood that the wind would blow a plume of radioactive gases from the Bataan reactor into Manila, Subic Bay, or Clark Air Force base -- or all three -- in the event of a major accident or natural disaster at the proposed nuclear plant.

The report summary states: "Windflow patterns that would transport a Bataan plume to Manila, Subic Bay, or Clark Air Force Base may be expected to occur approximately 25% of the time in the spring, 86% in the summer, 28% in the fall, and 7% in the winter, for an annual occurrence rate of 37%" (Nuclear Export Monitor, vol. 1, #2, p.2). There are 8 million Filipinos in Manila, thousands on Bataan peninsula, and 6,500 U. S. citizens at the Subic Base and 20,800 U.S. citizens at Clark Air Field. ^{2/}

D. The problem of waste storage. Even the Marcos controlled Philippine Atomic Energy Commission concedes that since the country is

^{2/} Homeport Assignment of U.S. Naval Active Duty Personnel, U.S. Navy Doc. F-390 0220 (June 30, 1979); Report of Overseas Dependents of Active Duty Military Personnel U.S. Navy Doc. 1052-SA (June 30, 1979); U.S. Air Force Military/Civilian Strength by location, U.S. Air Force Doc. RCS:HAF MPP(Q) 7402 (June 30, 1979).

in a volcanic belt, it cannot provide for the long-term disposal of the radioactive wastes to be produced by the plant (from letter of Representative Clarence Long to Mr. Joseph Hendrie).

We believe that such considerations of health and safety relating to the lives of millions of Filipinos and 27,300 U.S. citizens are alone sufficient reason for refusing an export license to the Westinghouse Corporation.

Clearly the Commission is to consider the impact of a license on the health and safety of the public. 42 U.S.C. §2133(a). That this "public health and safety" standard should be applied to the health and safety of the Filipino people and not just to Americans will be discussed in the section below. But, even if the Commission were bound by its prior decisions on this point, the presence of 27,000 U.S. citizens (base personnel and dependents) is a sufficient U.S. public to invoke this health and safety criteria in full force.

In addition, the Commission, under 42 U.S.C. 2133 and 2155(a)(1), must not grant an export license unless the Commission first finds that the proposed export would not be "inimical to the common defense and security of the United States." This is a broad standard encompassing all phases of the national defense and security. See Pauling v. McElroy, 164 F.Supp. 390 (D.D.C. 1958).

Clearly the long term "common defense and security" of the United States is based heavily on maintaining good relations and friendship with

the peoples of other countries. The substantial and unreasonable health and safety threat to the Filipino people that would be created by the proposed Westinghouse nuclear reactor can only place in jeopardy the good will between the peoples of the Philippines and the United States.

2) Philippine martial-law government suppresses opposition to the Westinghouse nuclear reactor. It would be inconceivable that the U. S. public in 1979 would allow a nuclear reactor to be built on the side of an active volcano. The fact that Westinghouse has been able to proceed with its reactor project in the Philippines is intimately tied up with the fact that since 1972 there has been no free speech, press, right of assembly or other democratic rights in the Philippines.

As recently as February, 1979 the U. S. State Department wrote of the present Philippine government: "Martial law has resulted in the suspension of democratic forms of government and in the serious curtailment of the human rights of many citizens." Describing the elections of April 1978, the same report states: "There are unconfirmed but credible reports of widespread voter fraud, improper government influence and some restrictions on the opposition during the election." (Report on Human Rights Practices in Countries Receiving U. S. Aid, by Department of State, February 8, 1979, p. 395).

Even under the Marcos regime the Philippine people have expressed their opposition: 50,000 Filipinos have dared to sign a petition asking for the plants cancellation and some 6,000 have written to the Nuclear

Regulatory Commission in Washington with the same message (Nuclear Export Monitor, vol. 1, #1, p. 5).

It was this Philippine opposition beginning to surface even under martial law that caused Marcos to suspend construction of the plant and hold public hearings this past summer (hearings that were "railroaded" to a close before critics were fully heard according to opposition leader Lorenzo Tanada). The public expression of opposition in the Philippines to the reactor would have been even more powerful before now had it not been for the inhibiting effect of the martial law dictatorship.

Sister Aida Velasquez is a missionary in Morong (a town near the site). She writes: "The people live in fear. Despite their great apprehension and opposition, many people cannot talk openly against the nuclear power plant for fear of harassment." Sister Aida herself has been the object of such harassment, as a result of her outspoken criticism. The Philippine Power Corporation building the Bataan plant contacted her Mother Superior "requesting" that Sister Aida stop her activities, but she keeps on in her work (Nuclear Export Monitor, vol. 1, #1, p. 5).

Ex-Senator Lorenzo Tanada also is a witness to the repressive effect of the Marcos government in this regard. He says: "There is . . . a climate of fear resulting from martial law in the Philippines which inhibits the people from testifying and thereby prevents a full and effective discussion of the potential dangers posed by the plant" (Nuclear Export Monitor, vol. 1, #2, p. 5).

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Ernesto Nazareno, a worker at the Bataan plant who criticized the project and tried to expose short-cuts in the plant's construction, was seized by the Marcos police in June 1978 and has not been heard from since. No one on the outside knows whether he is still alive (Nuclear Export Monitor, vol. 1, #1, p. 5). The appended affidavit of William L. Cummings, at pp. 13-14, gives further evidence of the Marcos government's intimidation and authoritarian imposition of this nuclear reactor on the Philippine people.

While "common defense and security" is defined in the Act to mean the common defense and security of the United States (Atomic Energy Act, 42 U.S.C. 2014) the phrase "public health and safety" is nowhere defined in the Act. That phrase, however, has several times in the past been interpreted by the Commission to refer to the health and safety of the United States or of U.S. citizens. Edlow Int'l. Co., 3 N.R.C. 563, 574-76, 584-85 (1976), aff'd on other grounds sub nom.; National Resources Defense Council, Inc. v. United States Nuclear Regulatory Commission, 580 F.2d 698 (D.C. Cir. 1978) (per curium); Babcock & Wilcox, 5 N.R.C. 1332 (1977). It is submitted that this past Commission interpretation, while ostensibly based on a formal deference to another sovereign, is in fact implicitly grounded on a presumption that the foreign government involved, through an existing democratic process, is fully aware of the health and safety risks involved, and also, that because of its dependence upon its people for support, that government will be properly and

sufficiently protective of the health and safety of its citizenry regarding the nuclear material sought to be exported.

This presumption becomes merely a legal fiction however, when, as here, the Philippine government is a martial-law dictatorship found by the U. S. State Department to deny its citizens the most basic democratic rights and to maintain itself in power through force and electoral fraud; when, as here, the Philippine government has suppressed opposition to the proposed nuclear facility; when, as here, the health and safety risks are so gross and apparent; and when, as here, the U.S. based corporation seeking an export license appears to have bought its way into the Philippines.

3) The corrupt history of the Westinghouse reactor. Just how intimately the Marcos government is tied to the Westinghouse reactor may be judged by considering the case of Herminio Disini. Disini is a friend and golfing partner of President Marcos. Disini's wife is Mrs. Marcos' cousin and personal physician.

An article in the New York Times of January 14, 1978 quoted bankers involved in financing the reactor. They estimated that Westinghouse had given Disini a "commission" of from 4 to 30 million dollars for securing it the contract as against its rival General Electric.

Other awards to Disini included the leading role in plant construction for a construction firm of his, and the contract for plant insurance for an insurance firm of his. In addition he became the Westinghouse distributor in the Philippines.

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It is not only the repression of the martial law government, but its corruption as well, that have made this hazardous reactor a real possibility in the Philippines, in gross disregard of the risks to the health and safety of the Philippine people.

In a case not factually on point, but very instructive, the U. S. Court of Appeals for the Third Circuit recognized the broad responsibilities and mandate of the Nuclear Regulatory Commission stating that it operated under "a regulatory scheme which is virtually unique in the degree to which broad responsibility is reposed in the administrative agency, free of close prescription in its charter as to how it shall proceed in achieving the statutory objectives." Westinghouse Electric Company v. NRC, Civil Nos. 78-1188/89, 78-1204, 78-1892, 78-1894/95 and 78-1993-94, decided April 19, 1979.

The Friends of the Filipino People submit that when, as here, gross health and safety risks coincide with martial-law repression of opposition to the proposed nuclear facility along with the taint of corruption connected with the contractual arrangements for the reactor, then a full scale inquiry into the health and safety risks to the Filipino people by the Commission is required as the only available safeguard (either in the Philippines or the U. S.) that can effectively guard against an irresponsible export of life endangering nuclear material and a potential catastrophic tragedy.

4) Dumping unsafe technology on the Philippine people. In an article of October 2, 1979 relating the State Department recommendation of an export

license for the Westinghouse reactor, the Washington Post reported:

"Sources said one reason the administration approved the Philippine export is the health of the U. S. atomic power industry. Only one U. S. utility has ordered a nuclear power plant in the last three years."

Westinghouse should not be allowed to solve its marketing problems at grave risk to the Filipino people. Since it cannot sell its unsafe nuclear technology in the United States where freedom of speech is relatively effective, it seeks to dump this high-profit technology in a Third World country like the Philippines whose people are muzzled by dictatorship. Clearly the people of the United States would not tolerate a nuclear reactor being built 6 miles from an active volcano in our country. This is exactly the kind of exploitation of the difficulties of the Filipino people by a U. S. multinational that the Friends of the Filipino People objects to.

5) Multi-national distortion of Philippine national development. The Westinghouse nuclear reactor proposal is an example of the distortion that U. S. multi-national influence all too often causes in the Philippine economy. For can a project that puts the profits of a U. S. corporation and the corruption of the Filipino government above the safety of the Philippine people be termed anything but a distortion of Philippine national development.^{3/}

^{3/} The \$1.1 billion Westinghouse nuclear reactor, if constructed, would add considerably to the burden of the Philippines huge foreign debt -- already the second largest in Asia.

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In the affidavit of William L. Cummings, here appended, at page 12 he points out that the proposed Westinghouse nuclear reactor in the Philippines was from its inception not rationally based on energy or development policies, but rather was "a decision made in response to commercial concerns external to the Philippines." In the same manner the extensive deforestation that has taken place in the Philippines with its attendant and now irreversable destruction of the ecology and watershed in the Philippines was motivated by a concern for corporate profits and in disregard of the welfare of present and future generations of Filipinos. (Cummings affidavit, pp. 8-12). The over one billion dollars in development aid to be spent on the proposed Westinghouse nuclear reactor, if this license is approved, ignores the urgent need for reforestation and restoration of waterways in the Philippines. This is in contradiction to the policy set forth in Executive Order No. 12114 issued by the President entitled "Environmental Effects Abroad of Major Federal Actions," 44 Fed. Reg. 1957 (January 9, 1979) which requires taking into account foreign environmental considerations.

According to the Third World Energy Action Group, appropriate and alternative energy sources in the Philippines include methanol from sugar cane, low-head hydro-electric power provided by a multitude of streams and rivers, and a vast supply of geo-thermal energy.

Geo-thermal sources in particular would provide energy at much less cost than nuclear power, and the very volcanic conditions that make nuclear power unsafe, make geo-thermal power possible. (See affidavit of William L. Cummings, here appended, p. 12.) Geo-thermal power might not

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provide the same high profits to U. S. corporations as nuclear, but would be a means of national development more consonant with Philippine reality.

6) The Westinghouse nuclear export must not become a U. S. political football. On August 8, 1979, President Carter addressed a communication to Chairman Robert E. Kirby of the Westinghouse Electric Corporation in which he expressed his regret that the export license for the Westinghouse nuclear reactor had been held up for so long. On September 28, 1979, the State Department recommended the granting of an export license to Westinghouse for this project.

There are both domestic and foreign policy political considerations on the Executive that can make a recommendation of denial of a particular export license more difficult than for an independent Agency. This is particularly true in an election year regarding domestic pressures. A recommended denial of an export license by the Executive based on conditions in the potential recipient foreign country might be a cause of temporary diplomatic embarrassment between the Marcos government and the State Department.

It is for this reason, we submit, that Congress clearly insulated final export licensing decisions from such political and diplomatic concerns and empowered and mandated the Nuclear Regulatory Commission to make licensing decisions solely on the basis of national security and on health and safety criteria. See Sections 1036 and 126a(1) of the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2133 and 2155a(1), and 42 U.S.C. 2133(a).

7) An impermissible use of U. S. taxpayers' dollars. The \$1.1 billion Westinghouse nuclear reactor in the Philippines is to be largely financed by a loan to the Philippine government of over \$600 million from the U.S. Export-Import Bank. The Export-Import Bank in turn is funded by U. S. tax dollars. In the end, therefore, it is the U. S. taxpayer that is to finance the Philippine reactor.

For the Carter Administration to recommend this profligate use of the U. S. taxpayers' dollars for a reactor endangering Filipino lives when it is cutting back on the funds necessary to satisfy the needs of the people and the cities of the United States is a thing that is difficult to understand.

Moreover this would be a waste of U. S. taxpayers' money that will have harmful repercussions on the relationship between the U. S. and the Filipino people -- thus undermining the soundest foundation of U. S. national security. Not only would it further identify the United States with the unpopular dictator Marcos (whose eventual fate will undoubtedly be that of the Shah and Somoza), it would also identify the United States with an unsafe and unwanted nuclear plant and with a U. S. corporation that seems particularly insensitive to the lives and safety of the Philippine people.

All this means that the U. S. taxpayers would be allowing their hard-earned tax dollars be used to win the hostility of the Philippine people towards the United States.

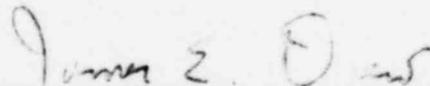
By negative example the Westinghouse nuclear reactor proves that the interests of the Filipino people and the interests of the U. S.

people tend to coincide, and both will be best served by policies that promote friendship between the two peoples.

CONCLUSION

For the reasons set forth above, the Friends of the Filipino People submit: 1.) that the Commission has both the authority and obligation to examine the health, safety and environmental impacts in the Philippines of the proposed Westinghouse nuclear reactor in reaching its licensing determination; 2.) that these issues must be examined on their own merits as they relate to the Philippines and the Filipino people and not only as they may be connected with the U. S. national security and common defense; 3.) that the examination and consideration of these issues must utilize the same criteria and reflect the same concern for the Philippines and for the Filipino people as if the application were for a domestic license, and; 4.) that hearings should be held in this matter which are comprehensive, public and with the full participation of both proponents and opponents of the license herein sought.

For the reasons set forth above we urge the Nuclear Regulatory Commission to refuse to grant an export license for the proposed Westinghouse nuclear reactor in the Philippines.


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