

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of the  
License of Commonwealth  
Edison Company to Construct  
Units 1 and 2 of the LaSalle  
County, Illinois Nuclear  
Power Station

Docket #50373 and #50374

PETITION FOR NRC TO INSTITUTE  
PROCEEDING TO SUSPEND AND/OR REVOKE LICENSE

(1) The Petitioners - Citizens Against Nuclear Power, Edward Gogol, Director; Illinois Valley Citizens Against Nuclear Power, Jim Jenkins, Director; Citizens United for Responsible Energy, Gary Naumann, President; Appleseed, Bridget Rorem, Spokesperson; DeKalb Area Alliance for Responsible Energy, Robert Felt, Spokesperson; Society Against A Nuclear Environment, Kevin Casey, Spokesperson; Sinnissippi Alliance for the Environment, Stanley E. Campbell, Spokesperson; Chiwaukee Radioactivists, Jennifer Reams, Spokesperson; Safe Energy Now to Save the Environment, Lola Hill, Spokesperson - are organizations concerned with protecting the public and the individuals comprising the organizations from the environmental, economical and physical safety hazards of nuclear energy.

(2) Commonwealth Edison Co. has previously applied for and has been granted a license to construct two nuclear power plants utilizing the Mark II containment design at LaSalle County, Illinois, Construction of these units is nearly complete, with start up of Unit 1 originally planned for 1979.

(3) According to a June 2, 1979 report in the Chicago Sun-Times daily newspaper, Commonwealth Edison Co. and the Nuclear Regulatory Commission (NRC) anticipate a nine month delay in the start up of the Unit 1 reactor. The delay is because Commonwealth Edison Co. and the NRC have, according to the Sun-Times report, "decided to 'stiffen' the design of the reactor containment structures to simultaneously withstand an earthquake and loss-of-coolant accident." Said report is attached to this petition and is made a part hereof as Exhibit A.

(4) According to Jan Strasma, the press officer for the NRC Region III office in Glen Ellyn, Illinois, and Steven Goldman, a spokesman for Commonwealth Edison in Chicago, Illinois, the alterations to be performed at the reactor consist of installing metal braces on the "downcomers" piping system of the steam pressure suppression system of the containment.

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(5) The 'stiffening' of the design of the pressure suppression system and/or reactor containment structures mandate the institution of a proceeding by the NRC to suspend and/or revoke the construction license previously accorded Commonwealth Edison Co.

- (a) The reactor pressure suppression system and reactor containment structure are essential safety features, intended to prevent the release of radioactive material into the environment in the event of a reactor accident.
- (b) NRC "confirmatory" tests of the Mark I and Mark II designs have revealed that its earlier judgment that pool swell hydrodynamics would be small is incorrect. These loads have never been considered in the Mark II design.
- (c) Confirmatory review of specific pool dynamic loads in Mark II designs will not be completed until October, 1980, according to NRC Status Summary Report -- Generic Technical Activities, August 11, 1978, Draft.
- (d) Construction of the Unit 1 reactor is scheduled for completion prior to the expected completion of the NRC confirmatory review.
- (e) To allow construction of the reactors to continue prior to a determination as to exactly which vital design specifications they are to be built to, may result in the nonimplementation of such vital design specifications. This has occurred before. On May 30, 1978, the NRC waived certain safety requirements for already operating Boiler Water Reactors of the Mark I design when "confirmatory" tests disclosed that such operating reactors failed to meet those NRC safety regulations. (structural design margin of safety cut in half; less conservative calculation of force utilized in determining base for safety margin; less conservative calculation of material strength utilized in determining safety margin)
- (f) There are presently no operative reactors utilizing the Mark II design in the United States. As such, there has been no indication whatsoever of the capabilities of the Mark II design as to pool swell hydrodynamics.

(g) Other major design changes in the Mark II containment system may be presently contemplated by Commonwealth Edison Co. This conclusion is warranted by the apparent discrepancy between the official 'stiffening' action represented (installation of metal brackets) and the time Commonwealth Edison Co. has said it will take to carry out such 'stiffening' action (nine months). See paragraphs 3 and 4 of this Petition. The exact nature of the other design changes which may also be contemplated for this nine month period is unknown.

(6) For reasons stated above, the Petitioners hereby request that the NRC institute a proceeding to suspend and/or revoke the construction license of Commonwealth Edison Co. as to both Units 1 and 2 of the LaSalle County nuclear power plants, pursuant to 10 C.F.R. Section 2.202. This request is filed pursuant to 10 C.F.R. Section 2.206. As major design changes in an essential safety feature of the LaSalle reactors are now being made or contemplated, it is essential that the suspension and/or revocation proceedings be made public, as the public interest is so vitally concerned here.

WHEREFORE, the Petitioners request that the Nuclear Regulatory Commission institute a proceeding, and hold public hearings, to suspend and /or revoke the license of Commonwealth Edison Co. to construct the nuclear power plants utilizing the Mark II containment design at LaSalle County, Illinois.

*Edward Gogol*

Edward Gogol, Director  
CITIZENS AGAINST NUCLEAR POWER

*Jim Jenkins*

Jim Jenkins, Director  
ILLINOIS VALLEY CITIZENS AGAINST  
NUCLEAR POWER

*Gary Naumann*

Gary Naumann, President  
CITIZENS UNITED FOR RESPONSIBLE  
ENERGY

*Bridget Rorem*

Bridget Rorem, Spokesperson  
APPLESEED

2041 129

PETITION FOR NRC TO INSTITUTE  
PROCEEDING TO SUSPEND AND/OR  
REVOKE LICENSE - Page Four

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Robert Felt, Spokesperson  
DEKALB AREA ALLIANCE FOR RESPONSIBLE  
ENERGY

Kevin Casey  
Kevin Casey, Spokesperson  
SOCIETY AGAINST A NUCLEAR ENVIRONMENT

Stanley E. Campbell  
Stanley E. Campbell, Spokesperson  
SINNISSIPPI ALLIANCE FOR THE  
ENVIRONMENT

Jennifer Reams  
Jennifer Reams, Spokesperson  
CHIWAUKEE RADIOACTIVISTS

Lola Hill  
Lola Hill, Spokesperson  
SAFE ENERGY NOW TO SAVE THE  
ENVIRONMENT

2041 130

NOTICE OF FILING

On August 21, 1979, I filed the attached Petition by mailing a copy of the same, with postage prepaid, to:

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Director of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

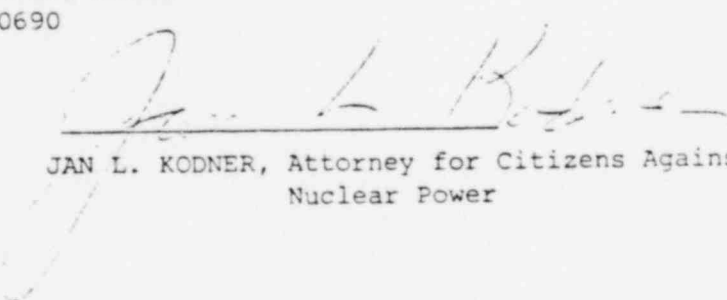
Director of Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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JAN L. KODNER, Attorney for Citizens Against  
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2041 131