

eberline

December 19, 1979

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Mr. Harold R. Denton
Nuclear Reactor Regulation Office
Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Dear Mr. Denton:

We are writing to urge reconsideration by the Nuclear Regulatory Commission of the de facto moratorium which we understand to be in effect for issuance of operating licenses for nuclear power stations that are completed and are apparently ready to deliver power.

We understand the number of plants being held off-line by the moratorium to be between four and seven, and that consumers are paying on the order of \$100 million every month which could be saved if those plants were operating.

We are impressed that the Kemeny Commission carefully reviewed the advisability of a licensing moratorium in the wake of the Three Mile Island-2 accident, but decided that such a moratorium was unwarranted. We are impressed, too, that in the past two weeks the U. S. House of Representatives resoundingly defeated Representative Markey's proposal for a six-month licensing moratorium.

We cannot, and do not presume to, tell the NRC how to do its job. We recognize that TMI-2 has brought to the Commission and staff a substantial burden of additional regulatory work along with pressure from some quarters essentially to stop the whole licensing process.

However, we must point out our opinion that a moratorium on issuance of operating licenses is imposing enormous costs on Americans. We mentioned above an estimate \$100 million monthly for buying more expensive electricity. Additional costs, less easily quantified, include health effects from alternative fuels, like coal and oil, further erosion of utility confidence in nuclear because of the vagaries of the licensing process,

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Mr. Harold R. Denton
Page 2
December 19, 1979

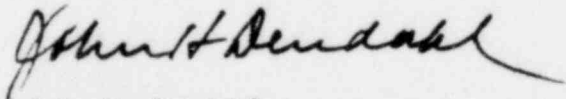
and international implications of our continuing delays in bringing U. S. resources on-stream to help meet U. S. energy requirements. We are far from satisfied that any possible benefit from the operating license moratorium is even close to commensurate with those costs.

Despite much of the tendency currently in vogue for nuclear energy to be cast as a menace to public health, we think that the NRC, its predecessors, and the nuclear industry can take considerable pride in the safety record that has been accomplished. We needn't remind you of what that record is, and we don't pretend that there is no room for improvement, but a great many things had to have been done right to accomplish a safety record that is probably unequalled in history. We find hard to believe any idea that four to seven plants, none of which is an untried design, poses a significant threat to the safety record, and therefore to the public health and welfare.

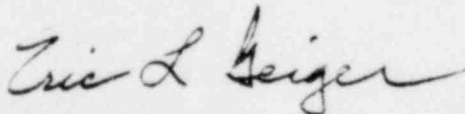
We are fully cognizant of the NRC's responsibilities and of the possible differences in our perspectives of the factors which support, on the one hand, the licensing moratorium and, on the other, resumption of licensing. We simply hope that our views as we have expressed them in this letter can be considered, and we add in closing our full support for the earliest possible resumption of issuance of operating licenses.

Sincerely,

EBERLINE INSTRUMENT CORPORATION



John H. Dendahl
President



Eric L. Geiger
Certified Health Physicist

JHD:gf