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# INTERFAITH CENTER ON CORPORATE RESPONSIBILITY

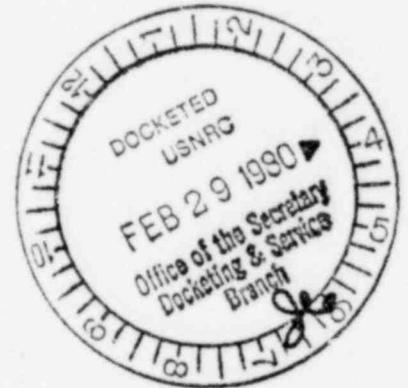
A Sponsored Related Movement of the National Council of Churches  
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Statement to the  
Commissioners of the  
Nuclear Regulatory Commission

Regarding

Proposed Export License for the  
Westinghouse Reactor and Materials  
on

February 28, 1980  
by



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As church organizations concerned with corporate and governmental responsibility for social concerns, we oppose the proposed export of the Westinghouse reactor, components and fuel to the Philippines.

We believe that the Nuclear Regulatory Commission decision to consider the export only in terms of its potential effects on the "global commons or the territory of the U.S., and the relationship of these effects to the common defense and security of the U.S." represents an avoidance of admitting the danger to the health and safety of 8 million Filipinos living in Manila, only 45 miles west of the proposed reactor site, as well as to the 27,000 Americans living at the nearby Subic Naval Base and Clark Air Force Base.

As NRC Commissioner Bradford points out in his dissent to the NRC Decision of February 8, 1980, it is indeed an "extraordinary" policy decision to "assess the impact on fish in international waters while declining to look into the impacts on the health and safety of concentrations of U.S. citizens located near the reactors." We would add that the NRC also ought to consider the possible effects of an accident at the Bataan nuclear reactor on the 8 million Filipinos living in Manila. In the Christian tradition, human life itself is considered precious, in spite of differences of race. Therefore, as churches, we view the lives of Filipinos as being as precious as those of Americans. We ask that you make your final decision according to this criterion.

Other reasons for taking this position are the following:

- 1) The reactor would be built on the slope of an active volcano, Mt. Natib, only six miles from the point of eruption. Also, it would operate within 90 miles of three other active volcanos.

2) The plant site has a long history of intense seismic activity. An earthquake could result in a meltdown of the nuclear reactor core, which would kill thousands of people.

3) There is no possibility of disposing of spent fuel from the nuclear reactor in the Philippines due to the geologic and seismologic instability of the region.

4) The Philippine government is a dictatorship, and an internationally recognized violator of human rights. Risking government retaliation, the Catholic Bishops' Conference of the Philippines is associated with the Philippines Movement for Environmental Protection, which advocates revocation of the construction license granted by the Philippine Atomic Energy Commission. The fact that parts of the Catholic Church in the Philippines have risked political retaliation by the Marcos government is an indication of the gravity of the implications of the proposed nuclear reactor export for the lives of the Filipino people.

5) More than 50,000 Filipinos have risked their freedom in signing a petition to the Marcos government opposing the plant construction.

6) More than 6,000 Filipinos have urged the NRC to refuse to grant an export license for the Westinghouse reactor.

The issue facing the NRC in making its final decision is not whether refusal to grant the license would violate the territorial sovereignty of the Philippines. Rather, the NRC should make its decision in terms of the health and safety impacts of the proposed nuclear reactor operation on the Filipino people. It is a matter of semantic gamesmanship to limit consideration of the export license application to "global commons" yet to exclude the part of the globe--the Philippines--that would be most directly affected by the export.

Obviously, using the Nuclear Regulatory Commissioner's criteria, there are "global issues" that the NRC can consider, such as the possibility of an accident in transportation of spent fuel from the reactors across international waters. Also, the lack of an Environmental Impact Statement regarding possible effects of returning spent fuel from the Philippines to the U.S. poses potential dangers to the "global commons."

While these are relevant concerns, they are really secondary to the central concern: It is immoral to approve the export of a nuclear reactor and materials that would be used to construct a nuclear power plant on the slope of an active volcano, thereby endangering the lives of millions of Filipinos and thousands of Americans.

It is immoral to protect the interests of Westinghouse, the Marcos dictatorship and various branches of the U.S. administration and ignore the interests of the people who would live with the imminent likelihood of a nuclear reactor accident due to the seismologic and geologic instability of the region.

It is immoral to claim that it is possible for the NRC to fairly assess whether to grant the export license without considering the export's effects on the safety of the Philippines.

We urge you to reject the Westinghouse application, and to recognize that evaluation of the "effect on global commons" should be carried out in terms of the universal imperative to protect human life.