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3 Godfrey Avenue
Hampton, NH 03842
May 17, 1980

Victor Gilinsky, Commissioner
Richard T. Kennedy, Commissioner
Peter Bradford, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: BRIEFING - May 23, 1980

Gentlemen:

Thank you for notifying me of the May 23, 1980 Briefing before the Commissioners relevant to New England Coalition on Nuclear Pollution (NECNP) Petition for Commission Review of the Atomic Safety and Licensing Appeal Board's Seabrook Seismic Decisions in ALAB 422 and ALAB 561.

Please be advised, that due to lack of finances, not that of interest, I will not be able to personally attend the briefing but, since I have been a General Intervenor at the Seabrook Licensing Hearings (Docket # 50-443 and #50-444) relevant to the Seabrook Seismic Design Criteria, I respectfully request the attached written remarks be made a part of the record in this briefing.

I would appreciate receiving a copy of your decision relevant to this matter.

Very cordially yours,

Elizabeth H. Weinhold

Elizabeth H. Weinhold

Enclosures

cc: all parties of record

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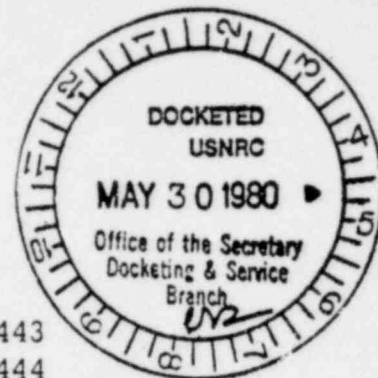


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of)
PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)
(Seabrook Station, Units 1 and 2))

Docket Nos. 50-443
50-444



B R I E F

Due to lack of finances, this general intervenor was not able to be a Party of Record at the Appeals Board Hearings but was able to borrow copies of the majority and dissenting opinions of the Appeals Board members. I wish to call the Commissioners' attention to the following:

A.) MR. MICHAEL FARRAR--DISSENTING OPINION

On August 3, 1979, Mr. Michael Farrar issued his dissenting opinion regarding certain questions related to the proposed seismic design of the Seabrook units. Without a doubt, in the opinion of this Intervenor, Mr. Farrar has clearly and precisely verified my concerns regarding the proposed Intensity VIII - .25g seismic design criteria for the Seabrook Units.

He appears to be the only NRC member who has an open and clear mind in understanding the complexity of the seismic issues related to Seabrook and the disagreement that exists between scientists.

Where such disagreement exists, the seismic design criteria should be above the basic minimum allowed by the regulations.

I wish to inform the Commissioners that Intervenor, Elizabeth Weinholt, FULLY SUPPORTS AND ENDORSES MR. FARRAR'S DECISION and urges the Commissioners to grant NECNP's "Petition for Commission Review of ALAB Decision on Seabrook Seismic Design.

B.) ACRS LETTER DATED DECEMBER 10, 1974

The Staff stated ^{1./} that the ACRS (Advisory Committee on Reactor Safeguards) in letter dated December 10, 1974, agreed with the proposed Int. VIII - 0.25g Seabrook Seismic Design.

The Commissioners should note that Dr. Okrent, THE ONLY SEISMOLOGIST on the ACRS panel submitted his "additional comments" on page 5 & 6 of the letter,, whereby he expressed, " I am left uneasy and believe it would be prudent to augument the proposed SSE acceleration of 0.25g". He further stated, "..... earthquakes are almost unique in their ability to fail each and every structure, system, component, or instrument important or vital to safety, and, in my opinion, the Staff evaluation of additional margin available from stress limits, methods of analysis, etc., did not consider all such systems....."

This Intervenor and NECNP tried to introduce the ACRS letter into the Seabrook Licensing Hearings but were not allowed to do so. I have many times questioned the reasons for funding the ACRS with my tax dollars when the results of their studies cannot be placed into the record of licensing hearings.

It is interesting to see that the Staff has made reference to the ACRS letter in their 12/11/79 Response.

I wish to request the Commissioners' review of Dr. Okrent's comments and I have attached a copy for that purpose.

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1./ NRC Staff's Response to NECNP Supplemental Memorandum in Support of Petition to Review, et al..dated 12/11/79....Page 3. "footnote"

C.) BOSTON-OTTOWA SEISMIC TREND a/k/a SEABROOK-OTTOWA SEISMIC TREND

The majority of the Appeals Board and the NRC Licensing Board relied heavily on the Staff's interpretation of :

"Two distinct tectonic provinces along the Boston-Ottawa Trend known as northeastern and southeastern regions of seismicity"

The Quarterly Bulletins published by Boston College ^{1./} seem to indicate a disagreement with the Staff's interpretation of the activity along the trend.

Enclosed is a copy of the map depicting seismic activity during the period October 1975 to June 1979. It appears to indicate a CONTINUOUS LINE OF SEISMIC ACTIVITY along the trend which this Intervenor has (as seen in the transcripts - 11912 etc.) referred to as the Seabrook-Ottawa Trend.

(I question Canada's recent change of rating for the Ottawa earthquake from Intensity IX to Intensity VIII ^{/when} and wonder why they have not officially changed the rating of the 1727 and 1755 from Intensity IX to Intensity VIII. (Newbury & Cape Ann Earthquakes) Do they still hold to the Intensity IX for those quakes?)

These publications (quarterly bulletins) would support NECNP's argument...A-4...Request dated Sept. 26, 1979...

"Appeal Board Erred in Assigning no weight to Evidence that the Montreal Earthquake MMI IX govern selection of the SSE for the Seabrook Site."

I wish to request the Commissioners' review of these quarterly bulletins which support seismic activity - MOSTLY ALONG THE TREND - in just the past 3 1/2 years of monitoring.