

DOCKET NUMBER

PROPOSED RULE

PR-2,50⁽²⁾
(45 FR 20491)

Docketing and Service Branch US NRC
Samuel J. Chilik, Secty. of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

May 21, 1980

re: Proposed rule, Fed.
Register Vol. 45, No. 62,
Friday, Mar. 28, 1980
No Significant Hazards Consideration
10 CFR Parts 2 and 50

Dear Sirs:

The term "significant Hazard" appears repeatedly throughout the proposed rulemaking yet it is nowhere defined specifically, leaving "significant" to be anything that may be either politic or expedient at any given time.

The proposed rule lists "examples of amendments" either likely or Not likely to involve significant hazards consideration. Amendments that are to be considered Not likely to involve significant hazards consideration, and so would be excluded from having a public hearing when the Commission issues an operating license or an amendment to an operating license or construction permit for a facility, should be specifically stated in any "No Significant Hazards Consideration".

~~Objection~~ Objection is hereby noted to example Not likely to involve significant
(vi) A change which either hazards consideration increases the probability or consequences of a previously analyzed accident or reduces a safety margin but for which the results of the change are within regulation acceptance criteria;

The U.S. NRC, particularly after TMI, and with all the other problems of nuclear safety, should NOT accept a change, even "within regulation" that may increase the probability of an accident or reduce a safety margin. The nuclear industry has enough trouble trying to meet the requirements that now exist, in an attempt to ensure the health and safety of the public, without being permitted to downgrade this safety, even within "regulation acceptance criteria", when, in fact, these regulations need up-grading. The last thing the nuclear industry needs is another step backwards, and without a public hearing at that.



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