

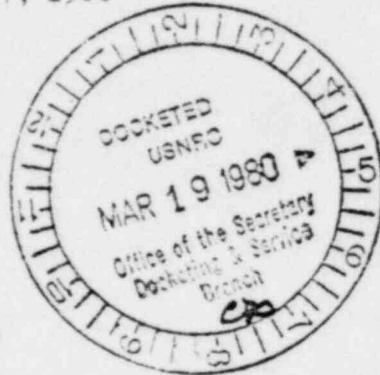
San Diego Gas & Electric

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D. W. GILMAN
VICE PRESIDENT-POWER SUPPLY

March 7, 1980

FILE NO. FEB 000



Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

This communication is in response to the publication of a request, in the Federal Register of February 15, 1980, for comments on the petition for rulemaking of William K. Watson, Docket No. PRM-50-26.

San Diego Gas & Electric Company is co-owner of the San Onofre Nuclear Generating Station (with Southern California Edison Company), at which Unit 1 has surpassed 11 years of highly satisfactory operation and where Units 2 and 3 are in the final stages of construction. In our role as a responsible nuclear electric utility, charged with providing reliable service to our customers at reasonable cost, we express our interest in the Watson petition and offer the following comments.

SDG&E strongly urges that the petition be denied!

Mr. Watson's petition appears to be based on several erroneous assumptions, such as:

1. The dispersal of radioactive materials contained in a nuclear facility, subjected to an explosion from a large (e.g., 5-megaton) atomic weapon, would represent a significant fraction of the total radioactive debris created by such an event.

Knowledgeable individuals will recognize that a ground level detonation, such as postulated in the petition, will result in very extensive cratering (i.e., excavation of a depression in the ground, representing the levitation of material of the order of cubic miles in volume) and activation of the pulverized, air-borne debris. Such debris would constitute the overwhelming hazard to the population surrounding the site, far in excess of the radioactive inventory of the facility. Thus, the hazard stems primarily from the weapon's effects on natural materials and only incidentally on the dispersal of the facility. In fact, the volume of the activated structural materials of the facility represents a greater hazard than the nuclear related contents of the facility.

Acknowledged by card. 3-20-80, LDR

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2. The explosion of a single atomic weapon directly on a nuclear facility is likely.

The postulated event is wholly unlikely to be an isolated accident. It is only conceivable as an element of an all-out nuclear exchange on an international scale. Thus, the hazard to the public is that of a nuclear war, rather than an isolated, direct attack on a single facility.

3. A nuclear facility can be constructed to withstand a direct hit, ground level detonation of an atomic weapon with a 5-megaton yield without dispersal of radioactive materials in excess of 100,000 curies.

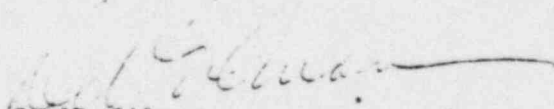
Again, knowledgeable individuals understand that a direct hit of such magnitude, even on a facility deliberately constructed underground, will result in essentially total vaporization of the facility as well as a very much larger volume of soil and rock from the site. Thus, one is hopelessly naive to contemplate such construction and, at a minimum, i.e., smaller weapons, such construction would be prohibitively expensive.

It should be recalled that the basic reason for Dr. Edward Teller's proposal (years ago) that nuclear power plants be constructed underground was to minimize the vulnerability of electric generation facilities to nuclear attack and so to assure the United States with survival capability in the event of a nuclear war. His thesis was that electric supplies are vital to continuing resistance in such a conflict.

Upon a review of the foregoing comments, one can only conclude that Mr. Watson is either naive about construction capabilities and weapons effects, or his petition is an attempt to force unreasonable requirements to be imposed on new nuclear facilities based upon undisclosed motives.

In summary, we urge the Commission to deny the Watson petition.

Yours very truly,


D. W. Gilman
Vice President
Power Supply

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