

conditions. If the research and development program fails to establish that the chemical additive is acceptable, the applicant will install charcoal filters for that purpose.

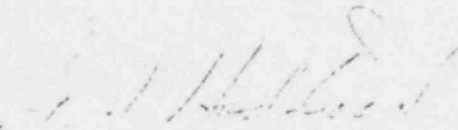
The Commission's established procedures are adequate to carry out the apparent intent of the board's recommendations without imposition of a condition in the construction permit. Pursuant to these procedures, the information developed by the research and development program will be incorporated in the application for an operating license. If the Commission for any reason determines that a further hearing is desirable, or any interested person requests a hearing, a further hearing can be held at that time.

The basis for the board's recommendation is its interpretation of unspecified reports by the Oak Ridge National Laboratory and others of studies of the use of containment sprays for iodine reduction. The board did not request comments from the parties concerning these reports. While these reports point up matters which must be considered in the evaluation of containment sprays, they do not of themselves establish that containment sprays are not effective as iodine absorbers. In any event, the matters raised in the reports are the subject of the proposed research and development program.

The use of a chemical additive in containment sprays is not a new concept. It has been proposed and approved in several recent applications. Moreover, the proposed Crystal River facility is identical to the Metropolitan Edison facility in which the same chemical additive is proposed for use as an iodine absorber in the containment spray. Construction of the Metropolitan Edison facility was approved by an atomic safety and licensing board in an initial decision dated May 16, 1968. It became the final decision of the Commission on July 1, 1968.

In our view, there is no reasonable basis shown in the board's initial decision for imposition of the recommended condition.

Respectfully submitted,



Gerald F. Hadlock
Counsel
AEC Regulatory Staff

Dated at Bethesda, Maryland

the 14th day of October, 1968.

POOR ORIGINAL