

YANKEE ATOMIC ELECTRIC COMPANY

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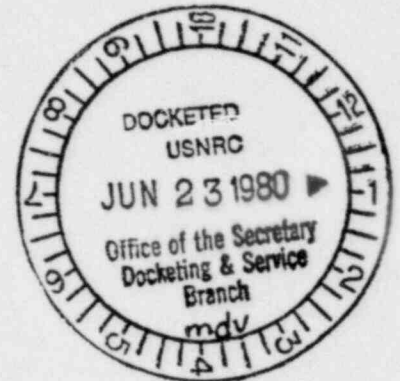
WYC 80-19



20 Turnpike Road Westborough, Massachusetts 01581

DOCKET NUMBER
PETITION RULE PRM-2-10 (10)
(45 FR 26071)

June 19, 1980



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing & Service Branch

Subject: Comments on Petition for Rulemaking from the Citizens Advisory Board of the Omaha, Nebraska-Council Bluffs, Iowa Metropolitan Area Planning Agency (45FR26071-4/17/80)

Dear Sir:

Yankee Atomic Electric Company appreciates the opportunity to comment on the subject petition for rulemaking. Yankee Atomic owns and operates a nuclear power generating plant in Rowe, Massachusetts. The Yankee Nuclear Services Division also provides engineering services for other nuclear power plants in the northeast including Vermont Yankee, Maine Yankee, and Seabrook 1 and 2.

Yankee Atomic recommends that the petition be denied. We believe the impacts significantly outweigh the value of this proposal.

The proposed amendment requiring formal public hearings in every instance of issuance, amendment, modification, suspension or revocation of a facility operating license would place an immense burden on licensees and the NRC staff without measurably contributing to improved health and safety of the public. The time spent at public hearings would divert technical resources from important engineering and operational concerns thereby actually negatively impacting safety. Also, the significance of public hearings would be greatly diminished since the majority of time would be spent on procedural and minor technical matters. The importance and benefits of public hearings are related to major public policy decisions such as regional planning and the like.

The proposal to permit interested persons to request a formal hearing without being required to intervene approaches absurdity. An individual requesting a hearing should have a good reason and should be able to vigorously pursue their contentions before a formal hearings board. They should not be allowed to request a hearing when their major objective is merely interruption of public energy supplies or media exposure. The opportunities for individual intervention provided in the present system already are more than ample and in fact have often impacted plant operation

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Acknowledged by card 6/23/80. mdu.

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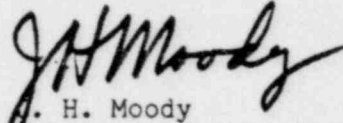
with absolutely no benefits accruing to the public, the licensee, or the NRC whatsoever. Examples of this are legion, but the extended 6 month shutdown imposed on Boston Edison's Pilgrim Unit 1 in 1974 is clearly an example of abuse of the system and resulting in needless loss to the public. These proposed amendments would exacerbate the problem of irresponsible intervention even further.

If a Public Information Program is the objective of the proposal we believe such a program could be beneficial to everyone but it should be considered outside the context of a licensing action for the reasons discussed above.

If you have any questions regarding our comments, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



J. H. Moody

Senior Licensing Engineer

JHM/kaf