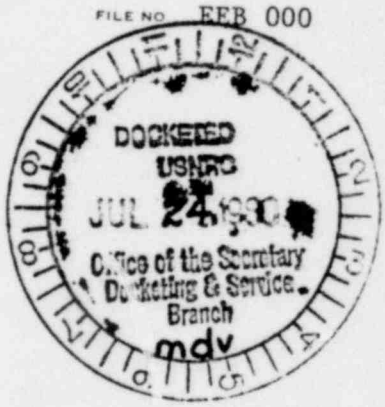
SAN DIEGO GAS & ELECTRIC COMPANY
P. O. BOX 1831 SAN DIEGO, CALIFORNIA 92112
(714) 232-4252

DOCKET NUMBER
PROPOSED RULE PR-50,51 (7)
(45 FR 40101)

July 14, 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 Sir:

The San Diego Gas & Electric Company is pleased to submit the following comments in response to the NRC Statement of Interim Policy published in the Federal Register of Friday, June 13, 1980. SDG&E is co-owner of the San Onofre Nuclear Generating Station and is vitally interested in Commission licensing policy.

The Statement of Interim Policy announces that the NRC is revising its policy, effective immediately, to include consideration of "Class 9" accidents in environmental impact assessments. The NRC cites the TMI-2 accident as emphasizing the need for the changes in policy, and consideration of Class 9 accidents in reviews of the Clinch River Breeder and Offshore Power Systems Plants as precedent for broadening its policies.

SDG&E considers broader environmental examination of more serious potential accidents reasonable and within the normal purview of NRC licensing activities. However, we regret the linkage between such activities and the TMI-2 accident or the other unconventional licensing reviews. We do not believe that the TMI-2 accident qualifies as a Class 9 event, despite extensive core overheating. We, together with others, have long ago cautioned the NRC that more frequent operational incidents were potentially of greater risk (frequency x consequences) than the hypothetical, maximum credible events on which the NRC had concentrated its concerns. It is for such reasons that many knowledgeable individuals have, for some time, urged that the NRC adopt probabilistic risk assessment methodology and more realism when considering potential accident risks.

In its discussion (Fed. Reg. 40103), the NRC directs that "approximately equal attention shall be given to the probability of occurrence of releases and to the probability of occurrence of the environmental consequences of those releases." Since to the intervenors the latter probability is assigned a value of unity, two responsibilities fall

L-4-1, 14.50

Acknowledged by card. 7/24/80. mdv

8008120669

upon the NRC with the adoption of this policy. The first requires a thorough and concerted effort to educate the entire United States population of the significance of probability estimates in relation to nuclear hazards; the second requires similar treatment of the risks and hazards of other technologies that could be employed to satisfy the electrical demand. Since the public perceives the nuclear industry as not credible and since the NRC--through the NEPA process--is charged with protecting the public health and safety re nuclear plant deployment, it is incumbent on the NRC to provide the public with a factual assessment of the risks in proper context, i.e. the probability of public harm in satisfying the public need. We urge the NRC to undertake a vigorous program of public education so that NRC actions will be understandable, meaningful and credible to the interested public. In further clarification, it is incumbent upon the NRC to provide factual information to the public on the nature of radiation hazards. For example, the venting of Krypton-85 at TMI-2 needlessly agitated the local populace since they were not adequately informed of the very low hazard of Krypton gas, the meaning of the term "curie," the fact that Krypton is routinely released from nuclear facilities of all kinds all over the world, etc. The NRC may wish to enlist the National Institutes of Health, or some similar authoritative medical body, in conducting a portion of this education program, in order to enhance its own credibility.

SDG&E sincerely recommends the program described above, since it will matter little to the public that the "NRC's major resources" are devoted to making future nuclear plants safer, if it cannot comprehend how safe the plants are. Until the public realizes (a) that safety is relative, (b) that absolute safety is both unattainable and undesirable, and (c) that the benefits of energy production outweigh the risks (for all proven technologies), the efforts and activities of the NRC (as well as those of industry) are unlikely to be widely accepted.

Sincerely,

L. Bernath

L. Bernath, Manager
Research & Reliability

LB:ph

cc: Jerry Haynes - SCE
Dr. Carl Walske - AIF
Dr. Ed Zebroski - EPRI-NSAC