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AND
ENGINEERS
FOR
SECURE
ENERGY, INC.

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February 9, 1981

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John F. Ahearne
Chairman of the Commission
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Re: Public Meeting with NRC Commissioners, February 4, 1981
on "The Future of Nuclear Regulation"

Dear Chairman Ahearne:

Upon learning of the above mentioned public meeting, the Washington, D.C. office of Scientists and Engineers for Secure Energy inquired of Mr. Fouchard's office at the NRC as to the possibility of SE2 providing testimony to the Commission. SE2 was informed that apparently the Commission wanted views which it considered different from that of the Atomic Industrial Forum (in reference to testimony given by that organization on January 21, 1981); and, in particular, that the Commission wished to hear a variety of views from public interest groups opposing the use of nuclear power.

It is of great concern to the scientists, engineers and scholars of SE2 that meetings of this nature foster the impression that the public's interest is anti-nuclear. Furthermore, meetings carried out in the fashion of tacitly labeling one presentation from the industry as "pro-nuclear" and a subsequent presentation from the public interest as "anti-nuclear," contributes to greater polarization of an already excessively emotion-laden topic.

The fact that the interest of the public is not predominantly anti-nuclear has been repeatedly illustrated by numerous opinion surveys. Unfortunately, the fact is that the representatives of the 'public interest' presenting testimony on February 4 were either stridently anti-nuclear or have demonstrated by historical actions, consistent anti-nuclear sentiments and delaying tactics, rather than providing constructive input.

If it is, in fact, the Commission's task to see to the safe licensing of nuclear power plants (and clearly, by virtue of Congressional mandate, not to debate the need for nuclear power) in order to best protect the public, it is essential that the Commission also hears from public interest groups that represent the majority opinion of the public.

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According to a public opinion poll taken by Pat Caddell, for example, at the end of last year, the public supported building more nuclear power plants by 49 to 35 percent. Indeed, with respect to licensing and regulation, a poll conducted by the Council on Environmental Quality, the Department of Agriculture, the Department of Energy, and the Environmental Protection Agency found that, at the very least, the public would support by 69 percent those nuclear plants that now exist or have been built. Clearly, this constitutes a mandate to get on with the job of licensing.

There is a plethora of genuine public interest groups whose strong statements and testimonies closely parallel that of the public interest to name only a few: Americans for Energy Independence, Citizens for Total Energy, Americans for Nuclear Energy, Concerned Citizens for Energy and Environment, Electrical Women's Roundtable, The Energy Advocates, National Council for Environmental Balance, Coordinating Committee on Energy, MVoE, National Legal Center for the Public Interest, Building and Construction Trades Department of the AFL-CIO, International Brotherhood of Electrical Workers and some 20 other labor organizations, and some 75 state-wide organizations supporting nuclear energy, for example groups like Arizonans for Jobs and Energy and Oklahomans for Jobs and Energy. It is clearly appropriate and essential to the democratic process that these types of public interest groups have their opinions appear on the public record.

Of greatest concern to SE₂ though, is the fact that much of the so-called public interest testimony is not only at best misinformed, but often times patently ludicrous. Assertions that are publicly aired and unchallenged are afforded unjustified credibility by virtue of an audience with the Commission. These assertions, held up as 'facts', often blatantly ignore scientific reality, reasoned arguments and exhaustive studies.

In order to educate the public and help to allay unnecessary fears, it is well worth considering the highly esteemed value of reasoned scientific testimony. A 1980 Institute for Energy Analysis report entitled "Public Attitudes and Information on the Nuclear Option" pointed out that in response to the question, "How much confidence do you have in what various people or groups say on matters concerning nuclear energy development?," "58 percent of the public responded a great deal to scientists...followed by the NRC (39 percent), the DOE (36 percent) and leading environmentalists (34 percent)."

Indeed, the Sierra Club in its February 4th presentation decried its inability to muster the weight and credibility of scientific opinion. According to the transcripts from the meeting, Ruth Caplan of the Sierra Club said that: "Another problem is in getting expert witnesses....Independent witnesses who have the technical expertise are very difficult to find.... Often the few people who are willing to testify in the public interest are absolutely inundated with requests." It is worth considering that one reason for the paucity of expert witnesses in that arena is that there are in fact very few experts, knowledgeable in energy and health matters, who could legitimately testify on behalf of such single-interest groups and manipulate available data in the manner needed to put across the points so cherished by those intervenors.

While it is not germane to the NRC's stated mandate of licensing and monitoring the operation of nuclear power plants, it appears that the Commission has submitted itself nonetheless to uninformed, selective and insubstantial pronouncements about the energy needs of the United States vis-a-vis the need for nuclear power.

It is in this arena, particularly with respect to the unconscionable and continual delays in licensing existing nuclear power plants, that SE₂ along with many other non-profit public interest groups, wishes to address the Commission.

As a case in point, the DOE report "Electric Power Supply and Demand for the Contiguous United States 1980-1989" stated that "to assure reliable energy supply and provide for significant reduction of fuel oil consumption, every effort should be made to maintain the current schedules for construction and licensing of the following (ten) nuclear units. All of these units are scheduled for commercial operation by the end of 1981. Diablo Canyon 1 and 2, San Onofre 2, LaSalle County 1 and 2, Farley 2, McGuire 2, Summer 1, Watts Bar and Sequoyah 2."

Yet, according to the NRC monthly report submitted on January 30, 1981 to The Honorable Tom Bevill, Chairman of the Subcommittee on Energy and Water Development, Committee on Appropriations, there will be additional delays preventing the licensing of six nuclear plants this year with, for example, Diablo Canyon facing further delays of up to 12 months!

Diablo Canyon, in fact, is a lurid example of continual and unnecessary delays that burden the ratepayers of northern California with extensive costs. In fact, in California at large -- an area in which SE₂ is strongly represented -- it is estimated that delays in nuclear licensing costs ratepayers more than one billion dollars a year, delays which do not add significantly to the ultimate safety of those power stations.

It is our understanding that the NRC is considering the possibility of holding further meetings of a nature similar to that of the morning of February 4, 1981.

Inasmuch as all of the foregoing points are relevant to the reasonable and expeditious regulation of nuclear power plants and, inasmuch as SE₂ is both a non-profit, public interest, educational group and an association of respected scientists and engineers, we would request that the Commission provide an opportunity for public testimony to be heard from SE₂ in concert with scientific communities, such as the: American Physical Society, American Chemical Society, American Institute of Chemical Engineers, American Institute of Mining, Metallurgical and Petroleum Engineers, American Institute of Physics, American Nuclear Society, American Society of Civil Engineers, American Society of Mechanical Engineers, Health Physics Society, Institute of Electrical and Electronics Engineers, and National Society of Professional Engineers.

SE₂

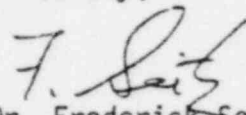
John F. Ahearne

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We would hope that such testimony could provide an opportunity to mitigate the unnecessary polarization engendered by the proceedings so far this year.

Sincerely,


Dr. Frederick Seitz
Chairman

FS:mst

cc: Commissioner Peter A. Bradford
Commissioner Victor Gilinsky
Commissioner Joseph M. Hendrie

Senator Robert Stafford
Senator Alan K. Simpson
Senator Gary Hart
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