



by Ansel Adams in *This is the American Earth*

SIERRA CLUB

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342



April 7, 1981

SECRET NUMBER PR-2
PROPOSED RULE
46 FR 17216

Re: Proposed Amendments to Rules of Practice
for Domestic Licensing Procedures

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

ATTN: Docketing and Service Branch

To Whom it May Concern:

The Sierra Club would like to express grave concern regarding the hasty and ill-conceived proposals "to expedite the licensing process" which are contained in NRC's proposed amendments. In respect to the invitation for formal comment on these amendments, we would like to join in the detailed comments prepared by the Union of Concerned Scientists in conjunction with the Natural Resources Defense Council which have already been submitted to NRC (comments prepared by Ellyn R. Weiss, Harmon and Weiss, 1725 I Street, N.W., Washington, D.C. 20006).

The Sierra Club believes there are many constructive steps which can be taken by NRC in regard to the Licensing Process which would have the effect of expediting the process without injuring the rights to access of intervenors and the general public. Unfortunately, the Commission has not chosen to explore these issues systematically before proposing its recommended amendments.

In particular, the Sierra Club would commend to the Commission's attention the recommendations for administrative and personnel changes made by Chief Administrative Judge Cotter and dated February 25, 1981. These pragmatic approaches would allow the Commission to proceed at an expedited pace in the consideration of plant licenses without damaging the public's overriding interest in the surfacing and resolution of all significant safety issues during the hearing process.

Sincerely,

Brooks Yeager
Washington Representative

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