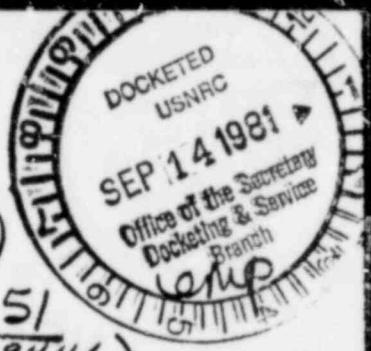


Marvin I. Lewis
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Phila PA 19149
9-10-81.



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

SECRET NUMBER
PROPOSED RULE **PR-50**
(45 FR 41786)

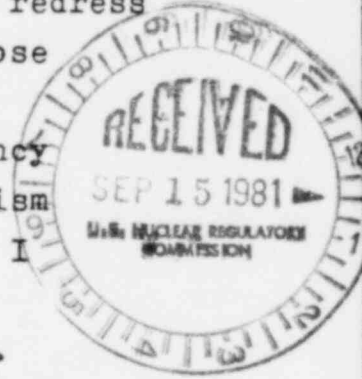
DOCKET NUMBER **8**
PROPOSED RULE **PR-51**
(46 FR 39746)

SIR:

This letter contains not only my comments ;but also , m. protest .)

I am writing to protest the proposed rules
10CFR 51 Need for Power and Alternative Energy Issues in OL Proceedings
10CFR 50 Financial Qualifications, Domestic Licensing of Production
and Utilization Facilities.

The real purpose of these rule changes is not mentioned in the
FR Notices. The real purpose is the elimination of any semblance
of meaningful intervention on the part of the public.
This purposeful and obvious repeal of First Amendment Rights by
a Congressionally chartered Commission is unlawful and dispicable.
This rule change is unlawful in that the 1st Amendment specifically
gives the people the right "to petition their Government for redress
of grievances." Other Amentdments require fair hearing of those
petitions.



Elimination of a fair hearing process in the name of efficiency
is Fascism. The Founding Fathers did not chose Fascism. Fascism
is a very 'efficient ' form of government , but I hope that I
do not have to explain its other drawbacks (such as torture,
unlawful imprisonment , and elimination of individual rights).
Americans have shosen Democracy as their representative from
of Government. I hope that the NRC will accept the verdict of
the Congress and the People , and not attempt to impose Beaucratic
Fascism as our new form of Gavernment.

Further the statements in the justifications for the new rule are
wrong.

Need for Power and Alternative Energy Sources.

These items are very sight specific and change quickly with time .
A need for power forecast 10 years before the completion of a
plant may not exist ~~xxx~~ at the completion of a plant. This is
a legitimate ~~item~~ item to litigate in OL Herings.

Alternative Energy Sources are both site specific and time specific.
Wind power is very site specific. Also very efficient wind manhines
can be developed in less than th time it takes to build a nuclear
plant. Alternativw energy souces are required for OL Hearings, and
shoud be looked into automatically in all OL Hearings.

*Add: Jim P
AR-2014
Darrel Nash
P-45*

*D510
5/10*

Financial Qualifications:

This is most appropriate to investigate in OL Hearings. The financial market is 'turning its face away from nuclear investment.' (Barron's 8-24-21.) The accident at TMI#2 showed that the financial condition of the utility is very important in the handling of a major accident. The cost of construction has ~~gone~~ gone up 10 times or more over estimates. (PECO PUC case Paquette Testimony.) The cost of decommissioning and spent fuel repositories are still not known. They will be high.

We are in a state of inflation with higher interest rates than known before in peacetime.

All this and more require the investigation of a nuclear utility's financial qualifications ~~at~~ at each stage including and especially the OL hearings. Anything less is criminal on the part of the NRC.

Hopefully submitted,

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CU 9 5964.

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9.10.81

Please put these comments , both pages , in both dockets.