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Phoenix, AZ 85007  
January 13, 1982

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Mr. Nunzio J. Palladino  
Chairman  
U. S. Nuclear Regulatory  
Commission  
Washington, DC 20555

Dear Mr. Palladino:

This letter is in response to the Commission's notice in the Federal Register [FR 46, 63411 (1981)] inviting comment on the Department of Energy request for exemption pursuant to 10CRF 50.12 to begin site preparation for the Clinch River Breeder Reactor (CRBR).

The undersigned are observers of nuclear power development, and as private citizens have a continuing interest in seeing the NRC strengthen confidence in the nuclear regulatory process. Accordingly, in the past we have argued that the Commission should keep its attention relentlessly centered on maintaining and improving the safety of commercial nuclear power plants. The present proposal does not further this objective. In our judgment, should DOE believe that the present licensing requirements cause undue hardship in terms of cost and schedule delay, the appropriate remedy is legislation rather than the pursuit of an avenue that can only raise questions about the integrity of the licensing process and the separation between nuclear power development and safety regulation. NRC action to grant this exemption will undermine public confidence in the licensing process.

Finally, in answer to Question 11(b) we note that ample evidence exists to suggest that there is nothing crucial about the March, 1982 date, i.e. there is no technical or economic reason to identify this date as a milestone for the CRBR project. Indeed, most informed observers believe that the CRBR project is both obsolete and premature -- obsolete in that it reflects a technology that has matured since the inception of the project and premature in view of the projected time scale for depletion of our uranium resources. The industry, NRC

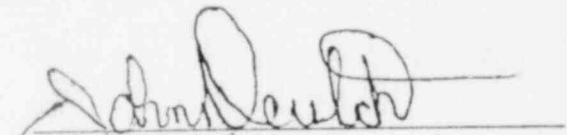
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and DOE would be well advised to focus effort today on light-water reactors and to structure a long term breeder development program aimed at producing genuinely competitive breeder reactors when they are needed.

Sincerely,

  
Bruce Babbitt  
John Deutch  
Hal Lewis

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