

PR-50  
(46 FR 61132)

24 January 1982

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

re: 10 CFR Part 50, proposed rulemaking on  
Emergency Planning and Preparedness for  
Production and Utilization Facilities

**Safe  
Energy  
Coalition  
of  
New  
York  
State**

RECEIVED  
JAN 28 1982  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555  
P.O. Box 495, Millerton, NY  
12546

Dear Sir or Madam:

We wish to file an objection to the proposed rule which would eliminate any requirement for offsite emergency preparedness.

It seems to us that the fuel loading operation is the key element which turns a massive generating plant construction project into a "nuclear" plant. Off site emergency planning and preparedness is required to protect the public from any potential accidental releases of radiation.

This protection is the inflexible mandate and responsibility of the Nuclear Regulatory Commission. To eliminate offsite preparedness during fuel loading and low power operation is an abrogation of the NRC's regulatory responsibility.

There certainly exists a statistical probability that a serious accidental release of radioactivity could occur during the fueling of the reactor or as the result of a reactor malfunction during low power operation. The public need demands that thorough emergency preparedness be in place prior the the fueling of any reactor.

We, therefore, urge the Commission to reject the proposed rule and to continue in strict compliance with regulation 45FR 55402.

Sincerely,

*Richard Hermans*  
Richard Hermans

DS/10  
1/10

ADD:

Mr. Samochian

1/28/82

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DOCKET NUMBER  
PROPOSED RULE PR-50  
(46 FR 61132)

January 23, 1982

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OFFICE OF THE  
DOCKETING & SERVICE  
BRANCH



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

Attention: Docketing and Service Branch

As an active participant in the recent hearings for the Susquehanna Steam Electric Plant's license, and having helped in evaluating the offsite Emergency Preparedness Plan of Luzerne County, I feel qualified to object to the proposed NRC Rule 46 F.R. 61132, Dec. 15, 1981.

As I understand the proposal, a license to operate a nuclear power plant at up to 5% of rated power could be granted without the offsite emergency plan first being approved. Do you mean to say there is no risk at this level of operation? The answer to this has to be negative. Not only is there the same risk, albeit at probably lesser amounts, at 5% operation as at 60%, particularly if the plant is a large one, but in some ways the risks may be higher during the initial operation of a plant due to the unfamiliarity of the plant operators with their particular plant and to undiscovered design and construction defects.

In addition, this proposal would have the effect of shutting out citizen participation in the review of any emergency plan. This is the one aspect of the licensing procedure that most affects citizens and which they can most easily understand and to which they are therefore able to make the best contribution. Many weaknesses were pointed out in the Luzerne County Emergency Plan by our group and other citizens - i.e. incomplete plans for the monitoring of evacuees in regard to the training of personnel and to the required number of survey meters, lack of written agreements with area hospitals, bus companies or garages, no written commitment from the necessary emergency workers, no training for school personnel, etc.

Citizen review of offsite emergency plans is absolutely necessary and no nuclear plant should be allowed to operate, even at 5% of its rated power, without an approved emergency plan. I therefore strongly urge the rejection of Proposal 46, F.R. 61132.

*Lea M. Csala*

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DS10  
1/6  
ADD:  
*M. J. Sogochian*