PRM-2-11

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C., 20555
Attention: Docketing and Service Branch

DOCKET NUMBER
PROPOSED RULE PRM 2-11
(47 FR 4310)

Dear Secretary:

As per your notice 47 FR 4310, the following comments pertain to the petition of Mr. Wells Eddleman, PRM-2-11:

It is agreed that 10 CFR Part 2 should be amended to provide a separate operating license hearing (mandatory) for each unit at a nuclear plant site. The time lags from operation of a first unit to a second necessitate a complete review for this second review, particulary in light of what is then known when the second is ready to operate. It is important that this review be carried out near the completion date of the second unit so that the actual as built status is used for the review, rather than the hoped for design. In particular the cost - effectiveness of operation, verses no operation must be considered. The range of possible costs of waste disposal and decommissioning should be included in this cost - effectiveness analysis. This will require the applicant to consider the alternatives, which it might not do without such a ruling. It would also be useful to the Commission.

It should be noted that the total amount of electricity distributed in the U.S. in 1981 was only 0.5 % greater than that distributed in 1980. Thus, with this slow load growth, later units of multiplant sites are likely to be delayed even more than has been the experience in the recent past.

These comments apply even more to third and later units at a multiplant site. Thus a separate operating license proceding should be performed for each reactor unit regardless of its location.

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ADD:
J. Phillips

Sincerely,

William A. Lochstet

Wm. A. Lochstet

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