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June 8, 1982

The Honorable Nuncio Palladino  
Chairman, Nuclear Regulatory Commission  
Washington, D.C. 20055

Re: Clinch River Breeder Reactor (CRBR)

Dear Chairman Palladino:

I was recently contacted by the Natural Resources Defense Counsel, Inc. concerning the possibility of the licensing of the Clinch River Breeder Reactor (CRBR). Natural Resources Defense Counsel, Inc. is concerned that the NRC will consider the license without supplementing its 1977 Final Environmental Impact Statement for the Clinch River project. Natural Resources Defense Counsel, Inc. advises me that if the 1977 FEIS is not updated, the NRC would not be considering important new information including

- (1) major changes in the design of the CRBR Reactor vessel and fuel core;
- (2) implications of the Three Mile Island accident, especially as it relates to human error as a cause of nuclear accident;
- (3) a recent U.S. Court of Appeals decision invalidating NRC's summary consideration of the environmental impacts of long-term radioactive waste disposal; and
- (4) changes in NRC regulations regarding safeguards, reactor siting, accident risk reduction, radiation protection, transportation of radioactive material, and emergency planning.

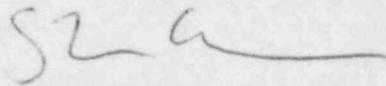
My experience in nuclear matters has been as an intervenor pro se and as attorney of record for several intervenors in the Allens Creek Licensing Proceedings. Aside from the specialized knowledge I have gained from these proceedings and allowing for the fact CRBR is a very different type of reactor from Allens Creek, still, my common sense tells me that " there is

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a lot of water under the bridge" since 1977. Therefore, I urge the NRC to issue a draft supplement to the FEIS. I further urge the NRC to circulate this draft supplement to myself and other concerned organizations and to the public generally for comments.

Thank you for your attention in this matter.

Sincerely,



Stephen A. Doggett

SAD/gh