

SCIENTISTS AND ENGINEERS FOR SECURE ENERGY, INC.

570 Seventh Avenue - Suite 1007
New York, New York 10018
(212) 840-6595

DOCKETED
USNRC

SE2
82 AUG 16 P 1

Miro M. Todorovich, Executive Director

August 11, 1982

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

DOCKET NUMBER

PRM-50-32

(47 FR 27311)

EXECUTIVE COMMITTEE

- Frederick Seitz, Chairman
Rockefeller University
- Erich Isaac, Vice Chairman
City Univ. of N.Y. City College
- Robert K. Adair, Vice Chairman
Yale University
- Miro M. Todorovich, Exec. Dir.
City Univ. of N.Y. Bronx Community

Samuel J. Chilk
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Ohio Citizens
for Responsible
Energy Filing
of Petition
for Rulemaking

Docket No. PRM-50-32

MEMBERS (partial listing):

- Luis W. Alvarez
Univ. of California, Berkeley
- Henry H. Barschall
University of Wisconsin
- *Hans A. Bethe
Cornell University
- Felix Bloch
Stanford University
- David Bodansky
University of Washington
- Norris L. Bradbury
Los Alamos National Lab.
- D. Allan Bromley
Yale University
- *R. Creighton Buck
University of Wisconsin
- Bernard L. Cohen
University of Pittsburgh
- *Karl Cohen
Stanford University
- Thomas J. Connolly
Stanford University
- John C. Courtney
Louisiana State Univ.
- Dwight H. Damon
Univ. of Connecticut, Storrs
- R. H. Dicke
Princeton University
- *Albert Gold
New York Polytechnic
- William W. Havens
Columbia University
- *Robert Hexter
University of Minnesota
- Robert Hofstadter
Stanford University
- Behram Kursunoglu
University of Miami
- Robert Lee
Hartford University
- Leona Libby
Univ. of California, L.A.
- *John McCarthy
Stanford University
- John P. Madison
Argonne National Lab.
- Robert S. Mulliken
University of Chicago
- *Thomas Pigford
Univ. of California, Berkeley
- Ernest C. Pollard
Pennsylvania State University
- *James Rainwater
Columbia University
- Norman C. Rasmussen
Mass. Institute of Technology
- Dixy Lee Ray
Energy Consultant
- Corwin L. Rickard
American Nuclear Society
- Glenn Seaborg
Univ. of California, Berkeley
- Malcolm J. Sherman
State Univ. of N.Y. Albany
- *Edward Teller
Stanford University
- James A. Van Allen
University of Iowa
- *Alexander von Graevenitz
University of Zurich
- Alvin M. Weinberg
Oak Ridge Associated Universities
- *Eugene P. Wigner
Princeton University
- Richard Wilson
Harvard University
- Werner Wolf
Yale University

Dear Mr. Chilk,

This Statement of Position comes in response to a Federal Register (Vol. 47, No. 122, Page 2731) notice of the Commission's publication for comment of a petition for rulemaking filed by Ohio Citizens for Responsible Energy, Docket No. PRM-50-32.

Scientists and Engineers for Secure Energy (SE2) is cognizant of proposals offered to the NRC, FEMA, and DNA for geographically localized and time limited studies which would outline ways in which to technically assure the safety of nuclear reactors in the aftermath of high altitude nuclear explosions which generate intense electromagnetic pulses (EMP's).

Consequently, SE2 suggests that the Commission (a) shelve the instant petition until an EMP study is complete, (b) promptly fund one of such studies, to be completed within a year's time, and (c) convene the Commission at the termination of the study and decide, on the basis of the completed EMP study, whether an EMP-related amendment to 10 CFR is desirable and, if so, what the appropriate wording should be.

Respectfully submitted,

Miro M. Todorovich
Executive Director

DS # add: John Philips
Faust Rosa 4000 MABB
P.1030

R. Leslie Dugan, Western Representative • 215 Market Street, Suite 930 • San Francisco, CA 94105 • (415) 495-5669

Mark R. Mills, Scientific Representative • 1225 19 Street NW, Suite 415 • Washington, DC 20036 • (202) 223-5381

Acknowledged by card 8/17/82 emp

8208180093 820811
PDR PR
50-32
PDR

Affiliation for identification only