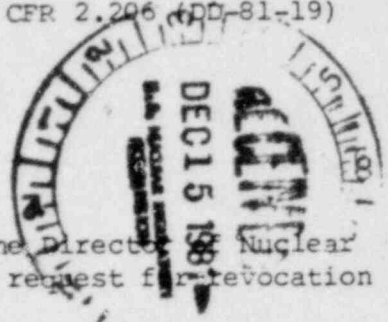


Community Energy Action Network

(714) 275-1162

December 10, 1981

To: NUCLEAR REGULATORY COMMISSIONERS PALLADINO, GILINSKY, BRADFORD, AHEARNE, ROBERTS
Re: Director of Nuclear Reactor Regulation Decision under 10 CFR 2.206 (DD-81-19)
SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 1
Docket No. 50-206
IS05-81-11-022



NRC Commissioners:

The undersigned hereby request that the NRC SET ASIDE the Director of Nuclear Reactor Regulation decision of November 16, 1981 denying the request for revocation or suspension of the operating license of San Onofre Unit 1.

We further request that you review this decision in light of evidence presented at the ASLB hearings on the seismic risk at San Onofre in the matter of licensing Units 2 & 3.

The request for action was filed by 1560 California residents beginning November, 1979 through 1980. The timing of the Director's decision was not issued until a full 2 years after the requests were filed but was filed one week before the originally scheduled decision of the ASLB on the seismic hazards at San Onofre.

It would appear that the Director was not concerned about issuing his decision in a reasonably timely manner but saw to it that the decision was issued before the action by the ASLB.

We submit that the Director's discussion of the seismic hazards is perfunctory and simplistic and evidences a lack of understanding of the seismic issue. He is relying on old information and fails to address the seismic risks testified to at the summer licensing hearings on units 2 & 3.

Any decision regarding Unit 1 should not be final until after the ASLB issues its decision on SONGS Units 2 & 3, which will set forth specific findings of fact regarding seismic risk.

Additionally, we request that public hearings be scheduled after the ASLB's decision. The public should be included in the review and seismic upgrading that is currently underway for Unit 1. It is clear in Mr. Denton's decision on Unit 1 that the plant does not currently meet the same seismic requirements as Units 2 & 3. The decision also points out that the emergency planning process is not complete. The public should not be locked out of this ongoing process of review, upgrading and improvement in the emergency planning. Hearings are especially in order for the 1560 Californians who individually filed petitions on this matter!

An in depth investigation of San Onofre, Unit 1 is additionally called for due to the following serious problems: 1.) embrittlement/"thermal shock" problem with the reactor vessel; 2.) faulty valves in the Emergency Core Cooling System; 3.) questionable repairs to steam generators considered a temporary solution; 4.) proximity of the site to half the population of California (10-12 million people within a 100 mile radius).

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Hearings and a complete investigation on Unit 1 are necessary for accountability and oversight on quality assurance standards. We will request that Congressional hearings also be held on the problems with San Onofre Unit 1.

Ideally, public hearings should be initiated by the Commission, an investigation conducted by the NRC Staff, and a thorough independent audit of Unit 1 should be instituted by consultants with no special interest or connection to either the NRC or the nuclear industry.

Sincerely,

Jim Jacobson Linda Newsum

Jim Jacobson Linda Newsum
Community Energy Action Network

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