

CRITICAL MASS ENERGY PROJECT

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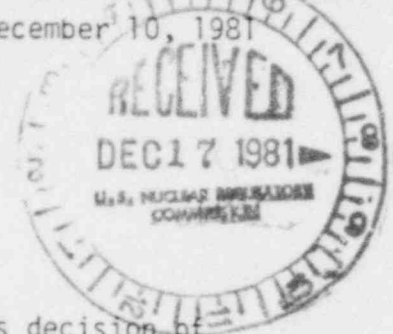
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December 10, 1981

The Commissioners
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

OFFICE OF SECRETARY
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Dear Commissioners:

This letter is a request to set aside the Director's decision of November 16, 1981 (Docket 50-206/LS05-81-11-022) denying the request for revocation or suspension of the operating license of San Onofre Unit I. As you are aware, Ralph Nader, the founder of our organization, made a similar request on August 6. The Director's most recent decision came in response to a request for action filed by 1,560 concerned residents of Southern California.

The timing of the Director's decision raises serious questions, it was not issued until almost two years after the requests were filed and because it came the week before the Atomic Safety and Licensing Board (ASLB) planned to issue its report on the seismic hazards of the area. Certainly it would have been more prudent to wait for the most recent seismic examination of the area. The discussion of the seismic volatility of the area included in the Director's November 16 letter does not address grave doubts brought to public attention during testimony before the ASLB during the summer.

No decision on the requests for suspension, revocation or licensee review of San Onofre Unit I should be made final until the ASLB issues its remarks regarding Units II and III which will set forth new and specific findings of fact based upon the most recent data regarding seismic risks. Even then, public hearings are in order to investigate how this information relates to the continued operation of Unit I. It is clear that Unit I is not capable of withstanding a ground motion of .67G as are Units II and III. It is also a matter of record that an earthquake larger than that could happen in the vicinity.

In the course of this year San Onofre Unit I has exhibited several outrageous shortcomings in its safety assurance. The plant has an embrittled reactor pressure vessel, a steam generator system held together by band-aid sleeves, as well as having a serious valve failure which could have prevented the Emergency Core Cooling System (ECCS) from operating properly had it been needed. These problems, in addition to the questionable seismic stability of the plant and its inadequate evacuation plans lead us to repeat our request for you to consider suspending the operating license of Unit I pending open and public licensee review.

Sincerely,

Richard Udell
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