



# State of California

GOVERNOR'S OFFICE  
SACRAMENTO 95814

EDMUND G. BROWN JR.  
GOVERNOR

916/323-6237

July 9, 1982

Mr. William J. Dircks  
Executive Director for  
Operations  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Dircks:

I write to register our objections to the schedule set for licensing the Clinch River Breeder Reactor (CRBR) and to request that the NRC temporarily delay that schedule. Such a delay is necessary in order to update the grossly inadequate and out-of-date Environmental Impact Statement for the Clinch River Breeder Reactor. Major changes in the design of the CRBR have occurred in the last seven years because of major advances in technical, environmental, and materials sciences and because of information learned from international experience with breeder reactors. As a result, the old EIS no longer evaluates the actual breeder design to be built in Tennessee. The effects of design changes must be incorporated into a supplement to the original EIS which reflects previously unaddressed impacts on the environment and public health and safety.

Since 1975 there have also been significant changes in NRC regulations that relate to health and safety. Some of these changes are the result of the major accident at the Three Mile Island nuclear power plant and some are the result of greater experience and technical advances. The information learned in the last seven years should be incorporated into a supplemental EIS, even if this means a temporary delay in the licensing schedule.

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Mr. William J. Dircks

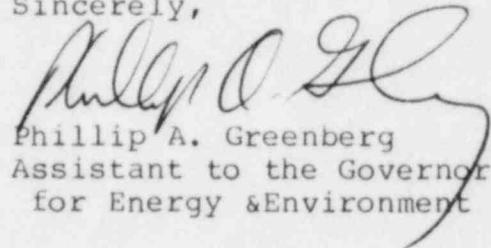
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Finally, we believe that the recent draft EIS for the generic Liquid Metal Fast Breeder Reactor was grossly inadequate, and we have filed comments to that effect. Because many of the issues raised in the State's comments are germane to the development of the Clinch River Breeder Reactor, we believe that it would be helpful to reevaluate need for and alternatives to the CRBR, in addition to the new technical information that has arisen since the original EIS was filed.

We hope the Commission will consider our views in making its decision.

Sincerely,

  
Phillip A. Greenberg  
Assistant to the Governor  
for Energy & Environment