

DOCKET NUMBER

12

PETITION RULE PRM-50-32  
ENVIRONMENTAL LAW PROJECT (77 FR 27371)

School of Law, 064-A  
University of North Carolina  
Chapel Hill, NC 27514

August 20, 1982

DOCKETED  
U.S. NRC

'82 AUG 23 P3:35

Mr. Samuel J. Chilk, Secretary  
U.S. Nuclear Regulatory Commission  
ATTN: Docketing and Service Branch  
Washington, District of Columbia 20555

OFFICE OF SECRETARY  
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BRANCH

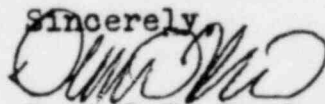
SUBJECT: Docket PRM-50-32, Ohio Citizens for Responsible Energy  
Petition, Design Against Electromagnetic Pulse

Dear Sir:

On behalf of the Environmental Law Project, I would like to comment on the petition for rulemaking proposed by the Ohio Citizens for Responsible Energy, Federal Register, Vol. 47, No. 122, June 24, 1982, page 27371. I support the rationale of the petition, and urge that the Commission adopt it.

In considering the rule and its ramifications, I would urge that the Commission give special attention to the effects of electromagnetic pulse on computer control systems, particularly those which service safety-related instrumentation (such as temperature and pressure indicators, water level indicators, coolant flow indicators, and other systems instrumentation necessary to bring the reactor to cold shutdown), on- and off-site power switching equipment and diesel generators, and the decay heat removal system. Also of critical attention should be starters and fuel injection systems (if any) in diesel auxiliary power systems, and spent fuel pool water circulation and coolant feed systems.

Admittedly, the effects of a high-altitude nuclear detonation are still open to speculation, but sufficient work has been done to indicate a potentially serious threat, particularly as the size and complexity of our reactors increases, and they become more dependent on computer controls, which themselves are in turn dependent on transistor and microchip technology which would be particularly vulnerable to an EMP attack. This is a matter which certainly deserves close attention by the Commission, and a careful cost/benefit analysis.

Sincerely,  
  
Daniel F. Read

*DS 11 Philips, John  
Add: 4000 MWBB  
Rosa, Faust  
P-1050*

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50-32 PDR

Acknowledged by card... 8/26/82 emp

1289 W. 105  
Cleveland, Ohio 44102  
August 18, 1982

DOCKETED  
U.S. RC

(11)

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC, 20555  
Attn: Docketing and Service Branch

DOCKET NUMBER

PETITION RULE PRM-50-32

(47 FR 27371)

82 AUG 23 P3:20

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear Sir,

I am writing you in support of the Ohio Citizens for Responsible Energy, which has filed a petition for rulemaking that would require nuclear plants to provide protection against electromagnetic pulse (EMP).

I understand that a nuclear explosion could be detonated (whether in a war or by terrorists) in such a way as to cripple electric and electronic circuits and components over a wide area. Perhaps many facilities would shut down, but in the case of a nuclear power plant, it could lead to a disaster above the original explosion. The plant itself could no longer operate, but because of EMP, the cooling systems could not operate either. Hence, the uranium cores would heat up, and we would have meltdowns, with all their consequences.

I am writing this because I am concerned about the Perry nuclear power plant, which is 35 miles east of Cleveland. It is due to be up for an operating license soon. A study was recently released that if there was a meltdown, it would among other things cause the loss of jobs as far as Cleveland in industry for 90 days.

Hence, I feel that the Perry operating license proceeding be suspended pending the outcome of this petition for rule-making.

Thank you.

Sincerely,

*Robert D. Parker*  
Robert D. Parker

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Add: John Philips  
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8/26/82 emp