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'82 AUG 30 P1:10

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Rt.# 1
Stoddard, WI 54658

August 24, 1982

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DOCKET NUMBER
PETITION RULE PRM-50-32
(47 FR 27371)

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Docketing and Service Branch
PRM-50-32

Dear Sir:

The proposed modification to 10 CFR 50 Appendix A is facetious in nature.

It proposes nuclear plants be "hardened" to resist the effects of electro-magnetic pulses. Presumably the petition misread Criterion 4, "Environmental & Missile Design Basis" to mean missiles as weapons of war rather than the actual case: missiles being pieces of turbine blades or pumps being thrown around a plant.

The idea that a nuclear plant (much of which is in steel-lined buildings) needs to be shielded against bomb blasts from nuclear war is ridiculous.

- (1) EMP pulses would not damage power circuits operating ECCS, etc. only computer circuits. Thus plant shutdown would occur but not core damage.
- (2) Even if core damage occurred, the impact on society of loss of the facility or radiation leakage would be minor relative to the effects of a nuclear detonation.
- (3) It is the Federal Government's responsibility to defend us against all foreign powers (per the Constitution) any backfit required due to failure of the government to perform this task would be a taxpayer not a licensee expense.

Sincerely yours,

J. D. Parkyn
John D. Parkyn

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Acknowledged by card. 8/31/82 emp