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Secretary
United States Nuclear Regulatory Commission
Washington, DC 20555

DOCKET NUMBER
PROG. & UTIL. PAC. 50-329 04/0M
50-330 04/0M

Dear Sirs:

The Mapleton Intervenors request that NRC amend 10 CFR Part 50 as is indicated in this letter.

The Mapleton Intervenors maintain that electromagnetic pulses are generated in space by detonation at high altitudes of nuclear devices.

The explosion of any nuclear device in space is capable of producing an electromagnetic pulse capable of derailing, disrupting, interfering with and temporarily destroying all electronic control systems, especially in regard to nuclear power plants.

In view of the seriousness of the electromagnetic pulse, the Mapleton Intervenors request that 10 CFR Part 50 be amended as follows:

- I. Section 50-13. Attacks and destructive acts by enemies of the United States; and defense activities.
 - (a) An applicant for license to construct and operate a production or utilization facility, or for an amendment to such license, is not required, with the exception of (b) below, to provide for design features or other measures for the specific purpose of protection against the effects of (I) attacks and destructive acts, including sabotage directed against the facility by an enemy of the United States, whether foreign government or person, or (II), Use of deployment of weapons incident to United States defense activities.
 - (b) Such applicant must, however, provide for design features to protect against the effects of electromagnetic pulse from whatever source.

Appendix A subpart 50. This portion of the regulation should be amended to read as follows:

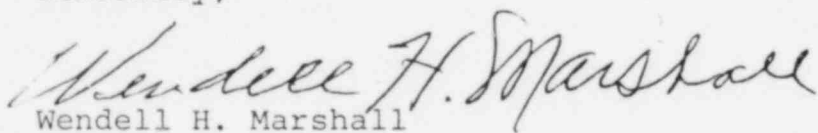
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"Criterion 4 - Environmental and missile design bases. Structures, systems and components important to safety shall be designed to accommodate the effects of and be compatible with the environmental conditions associated with normal operation, maintenance, testing and postulated accidents, including loss-of-coolant accidents. These structures, systems, and components shall be properly protected against dynamic effects of missiles, pipe whipping and discharging fluids that may result from equipment failures and from events and conditions outside the nuclear power unit including, but not limited to the electromagnetic pulses".

To support the proposed change to NRC rules and regulations is important since the Mapleton Intervenors claims that the present regulations provide a serious defect in nuclear power plant safety design which can be closed with proper design. Nuclear power plant hardening circuitry and equipment can be designed and installed at the time the plant is being built or constructed.

The petitioner to this rule change is an intervenor in the Midland Nuclear Power Plant licensing procedure, Dockets #50-329 and #50-330. The Mapleton Intervenors request that the NRC pursuant to Chapter 2.802 (d) of its regulations suspend those portions of the Midland licensing procedures relating to safety pending disposition of petition for rule making.

Sincerely,



Wendell H. Marshall
President
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WHM/nm