SCIENTISTS AND ENGINEERS FOR SECURE ENERGY, INC.

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January 21, 1985

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

Dear Sir:

I should like to comment on the proposed amendment of 10CFR50 that emergency planning need not consider the impact of a concurrent earthquake.

I am a member of Scientists and Engineers for Secure Energy, Inc., am Professor Emeritus of Nuclear Engineering at North Carolina State University, and am a member of the North Carolina Radiation Protection Commission. However, my remarks are as an individual and I do not represent any of those organizations.

The amendment as proposed is very acceptable as consistent with earlier NRC rulings on existing reactors, and preferable to the alternatives mentioned in the Federal Register, page 49642, column 2.

The first alternative, to include with the ruling the Commission's interpretation in the cases of San Onofre and Diablo Canyon, is not preferable since the simple statement of ruling is sufficient. However, the alternative is acceptable.

The second alternative, to leave the issue open for legal settlement, would merely add still greater delay in getting new power plants started and thus impose an unnecessary additional cost to the public.

The third alternative is not desirable, since emergency planning and exercises are already very manpower intensive, not only for the utilities but for state and local agencies. Having participated in exercises as an evaluator, I am aware of the enormous time and effort involved in the whole program. In light of new information that is appearing on radioactive material "source terms," such programs appear to be more extensive than needed already. The added complexity of responding to a simulated seismic situation would be a burden without benefit.

The Commission is to be commended on resisting the easy solution--to require that every conceivable contingency be addressed, no matter how remote.

Thank you for the opportunity to comment. Best wishes.

Yours truly,

Raymond L. Murray

Raymond L. Murray, PhD

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