

Atomic Energy Commission  
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Washington, D.C.

DOCKET NUMBER

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50-133  
5/11/62

185 Hill Road  
Berkeley, Calif.  
August 31, 1962

Gentlemen:

I wish to file an exception and/or intervention to the provisional operating license granted on August 17 of this year to the Pacific Gas & Electric Company for a nuclear installation on Humboldt Bay (Docket No. 50-133).

My objections are based on certain reservations about safety aspects of the plant and its operation. On August 20 I wrote to Mr. Harold Price, Director of Regulation for the Commission, to request certain documents which would enable a detailed evaluation of the potential hazard at Humboldt Bay. In my letter to Mr. Price I conveyed my willingness "to file a statement of interest or intervention (or equivalent)." I have not yet heard from Mr. Price and in the meantime the applicant has received the provisional operating license.

On the basis of the above statement and on the following specific objections, I would like to request (a) an indefinite extension of the provisional status of the license and (b) a re-hearing to be held in the city of Eureka. I believe that these requests are not unreasonable in view of the many unusual aspects of the application.

1. Pressure suppression containment. In a report dated March 14, 1960, the Advisory Committee on Reactor Safeguards (ACRS) stated "while the concept has merit it has not yet been demonstrated that the vapor suppression system proposed can be relied upon to protect the health and safety of the public at this site." On April 4, 1962, the ACRS reported to the Commission: "The Committee is aware, however, that there are still problems in the case of radioactivity control, operating and supervisory staff, and start-up operating and emergency procedures. We believe that these are matters of concern for the AEC staff rather than subjects for further review by the ACRS." The provisional operating license issued on August 17 of this year states on page 21 that "All of these matters mentioned by ACRS were discussed and resolved between the AEC staff and P. G. & E. with adequate provision being made therefor."

Since there is no further mention of this point in the August 17 report it seems essential, in the interest of public safety, that the present objection be sustained.

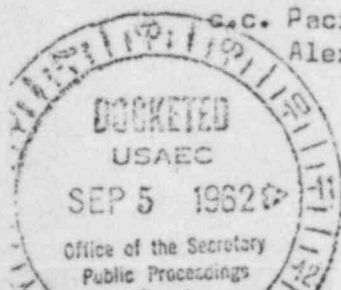
2. Exemption from requirements of Section 20.203(c) of 10 CFR 20. Specific objection is hereby made to this provision on the grounds that it is inimical to public safety and welfare.

3. Operating and supervisory staff, and start-up operating and emergency procedures. Attention is directed to the Hazards Analysis report dated June 15, 1962, wherein it is stated: "Any boiling water reactor will eventually become unstable if power is raised sufficiently high." Since the applicant can be expected to operate the plant for maximum profit and in view of existing unfavorable experience with boiling water reactors, it is suggested that the basic design, proposed method of operation and qualifications of the operational staff be re-opened for review.

P.G. & E. Pacific Gas & Electric Co.  
Alexander Grendon

Sincerely yours

J. B. Neilands  
J. B. Neilands



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