

Mr Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
1717 H Street NW
Washington DC 20555

DOCKETED
USNRC

Att'n: Docketing and
Service Branch

'88 JUN 27 P3:10

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Dear Mr Chilk:

OFFICE OF THE
DOCKETING AND SERVICE
BRANCH

9 May 1988 the Nuclear Regulatory Commission (NRC) published a proposed change to its emergency planning requirements for fuel loading and low-power operation of nuclear power plants.

This proposed rule change would eliminate many existing low-power licensing requirements, including offsite emergency response plans, any public notification systems (including sirens), and the training of offsite emergency response personnel.

As a resident of the Seabrook nuclear plant area, I steadfastly oppose the proposed amendment to existing safety requirements, already criminally threadbare. Any submarine admiral knows that an alarm system is as much required in a sub lying alongside the pier taking on stores as it is at sea during battle. Why are we being confronted with nonsense such as this? We demand what is already regulation in the military sector and have a right to it. The Commission will be found criminally negligent if it changes this basic ruling.

This proposed rule has been developed with only the utility's interests in mind. The NRC is once again moving to place the public at risk for the sole purpose of allowing Seabrook Station to obtain a low-power license, even though the question of whether it will ever be granted a full-power license is seriously in doubt, from intractable problems and perils everywhere else along the continuum from fuel mining to waste and terminated-plant interment.

The Commission would be well advised to keep in mind that winds of change are now astir this election year. With the distinct possibility of not only a new Administration but party as well, with a president opposing nuclear power, the NRC's past deeds and present practices will be weighed in the balance, and the continued careers of its luminaries subject to recall.

We witness today the efforts of the dying nuclear industry to regain stature with an American public increasingly skeptical over the safety, economy, efficiency and longevity of this government-sponsored business of atoms. We behold its byzantine government advocacy, with its skills in federal regulatory bodies now beginning to pull their wagons into a circle for Custer's Last Stand. We observe. We record. We forget not. Like Israel's Moshad, we remember.

We notice how much of the federal government is now, and has come, under scrutiny by the Congress. The NRC's hayride is about over. Colonel North and his associates are already on trial for crimes against this public and our laws.

The nuclear industry and its federal advocacies have consistently refused to submit to the requirements of democracy, that is, to mandated public advice and consent in this Republic. That era is now ending. There will be accountancy and correction. Starting Seabrook Station, destined to kill merely by operating (ALARA), will not help the Commission's case in court. It will only make it worse, when we clean house. Those responsible will be punished.

Sincerely, *John E. Loder* Box 666 Rollinsford NH 03869 22 June 1988 Encl: 4

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Underdog

To the Editor:
Typically, the word "underdog" refers to a sports team, a political candidate, or an individual operating at a disadvantage. But "underdog" takes on a more serious meaning when it refers to the homeless puppies and older dogs who end up in animal shelters across the country. The underdog in a football game may need your support, but the 13 million abandoned canines who face euthanasia each year need a home.

For this reason, October has been named Adopt-a-Dog Month at the Cochecho Valley Humane Society and more than 800 other shelters across the nation. Now in its seventh consecutive year, Adopt-a-Dog Month encourages prospective dog owners to adopt a canine from an animal shelter.

All our dogs make wonderful pets, and we need your help in making people aware of the number and variety of dogs we have available. We're inviting all local residents interested in owning a pet to visit our shelter between 10 a.m. and 3 p.m. any day of the week except Wednesday. We are located on County Farm Road in Dover.

Thank you for your support of the Adopt-a-Dog Month program. Please feel free to contact me with any questions or if you would like to visit our shelter, 749-5322.

Barbara Carr
Director, CVHS

Peace

To the Editor:
As a concerned mother of several children, I have recently focused my priorities back to the basics of life - and the long range chance for their futures, in consideration of the dangers of our Nuclear Age. I decided that world peace is the most important issue I must work on, as it seems clear that unless we solve the problem of the nuclear threat, all otherwise very important concerns may be made irrelevant by a single intentional or unintentional use of the massive destructive forces we have developed in the name of defense.

I am writing to urge my friends and neighbors to make a decision about war - that is, that it is not a viable solution to international conflict. There can be no winner in a nuclear confrontation. After we have made that step forward in our thinking, it is then our responsibility as voters in a representative democracy to see that our elected

officials also express that philosophy. We must engage our candidates in a thoughtful dialogue which will lead them to safer policies, for the sake of our continuation as a society.

We in N.H. have a unique advantage to influence political direction, out of proportion to our size. We need to take advantage of this chance and actively participate in this process, whereby the worldwide way of thinking can be shifted towards peace for all. Together we can make a difference.

Faith Bartlett
148 State St.
Portsmouth, N.H.

Shelter

To the Editor:
Displaying second thoughts about attempting total Seacoast nuclear evacuation (Herald: Sept. 20), N.H. civil defense authorities may opt instead to "shelter" the public, handicapped and unmovables they can't evacuate in time, inside shelters at hand, never intended for this.

Calculating that radioactivity-exposure reduction, compared to open air, in hotels, stores and churches reaches 60 percent but not 100 percent, and 10 percent but not 100 percent in wood-frame dwellings less than two miles from Seabrook Station, authorities set gamblers' odds on us if they can't guarantee radiation-free technology.

In other words, we're hearing that if neither total, safe evacuation nor completely safe sheltering are possible, then odds are on to try to preserve enough ratepayers through a catastrophe at least to keep the utility afloat and pay the mortgage.

So, when wailing sirens announce the kettle has blown, the governor will invoke emergency powers, order all unevacuated owners to open up to any stragglers, dusted with radioactivity, who approach, thus contaminating furnishings, water supply and any food, all realizing they have escaped nothing in a space infiltrating anyway by airchange, with host and visitor thus made unwilling partners in mutual undoing.

Presumed to be cooperative and able, the host must share alike of food, water, any medicines, clothing, bedding and amusements (surgical-sounding news bulletins), at his expense, while assuming householder liability of suing guests, facing possible larceny or violence from strangers, all this before authorities work out decontamination of the trapped populace,

structures, land and the nearby sea, then decide who to bury first, and how deep.

The utility and a subservient civil defense may twist and turn to save this misbegotten plant, but it was cursed by logic and good sense from birth. Until this is admitted to by government and utility alike, the inmates are running the asylum.

John E. Loder
Rollinsford

Contrast

To the Editor:
Experts tell us the more familiar something is the less we fear it.

Recently the USS Tullibee, a nuclear submarine, arrived at the Portsmouth Naval Shipyard for deactivation and decommissioning after 27 years of service. Public officials and business leaders were there to greet the submarine. A full-scale cookout was planned so that the ship's crew could meet townspeople.

Contrast this with another nuclear reactor on the seacoast, Seabrook Station. While certainly larger than a submarine, Seabrook uses essentially the same technology. Yet instead of parades, Seabrook has faced vocal opposition.

I guess over the years we've grown so accustomed to having nuclear submarines in our backyard that we don't give them a thought.

When Seabrook is eventually licensed and operating we'll problem be hard-pressed to explain to our grandchildren what all the fuss was about.

Heather Jenkins
North Hampton, N.H.

No badge

To The Editor:
On Sept. 29, at the day shift change at the Portsmouth Naval Shipyard, I entered the shipyard undetected. I had no I.D. badge. I had no business there.

I worked at the Portsmouth Naval Shipyard and Boston Naval Shipyard. We were checked coming in and going out. Is this the type of security our leader Reagan espouses? Bring back the Marines.

James O'Connell
81 Cottage St.

(Editor's Note: The shipyard declined to issue an official response to the letter.)

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quest for a rezoning on Maplewood Avenue from neighborhood Business and General Residence to Urban Business.

This land has been the object of several public hearings in the past after which the proposals have been turned down by both the Planning Board and the City Council.

Also on the agenda are revisions to site review regulations and an amendment to the zoning ordinance for the inclusion of a Wetlands Protection Ordinance.

race



BRUCE BABBITT
N.H. casualty

the caller concluded.
The caller said a written statement

Map to Page 6

State officials admit sheltering unworkable idea

By SARAH KOCH

Herald Staff Writer

The State of New Hampshire has filed a report with the Federal Emergency Management Agency admitting designated shelters won't protect the beach population from a nuclear accident at Seabrook Station, a Hampton attorney says.

According to the lawyer, Matthew Brock, the report states that the beach population, which town officials say can exceed 200,000 on a summer day, should evacuate the area rather than be directed to area shelters.

The state "is limiting the plan to evacuation as the means to protect the public. And given the evacuation time estimates that extends to well beyond 10 hours you can look at people sitting in their cars for the entire time radiation is falling," said Brock.

Seabrook opponents argue that beachfront buildings considered as potential shelters are flimsy wooden structures without proper insulation to protect the beach population in the event of an accident. And in the report, the state conceded available shelters have "limited usefulness,"

said Brock.

"They are saying essentially that sheltering is not a viable option. They (state officials) don't want to defend wood-frame buildings with holes in it," he said.

But FEMA stated last fall that evacuation plans are inadequate because delivering the public to safety could not be done in a timely manner, said Brock.

Whether FEMA will continue to criticize proposed evacuation measures as insufficient in the NRC sheltering hearings is still unknown, but Brock senses the agency, giving in to pressure from special interest groups, hopes to "dilute" its input in the issue.

FEMA stated last month that the emergency response plan must "adequately protect the public health and safety by providing reasonable assurance that appropriate protective measures can be taken off site in the event of a radiological emergency."

FEMA stated then the state's plan "provides neither an adequate description of how a sheltering option might be used nor a rationale for not having the option available for the transient beach population."

Carried 12 of 13 NH cities

is of mind by voters helped Bush score primary victory

On the Republican side, the analysis shows that Bush's union with Reagan, a strong campaign organization and last-minute decisions by voters gave the vice president a sure victory.

Dukakis carried 12 of the 13 cities, losing only Manchester, narrowly, to Gephardt. But the Massachusetts governor's walkaway margins elsewhere more than compensated for the Manchester loss. Statewide, Dukakis beat Gephardt 37 percent to 20 percent.

WBZ-TV exit polls showed that 70 percent of Democratic voters want Seabrook closed. Of these, 44 percent voted for Dukakis, whose opposition to the plant has stymied its licensing, while 21 percent voted for Simon and 14 percent for

Gephardt.

One-fifth of the Democrats said they support Seabrook. Of these, 33 percent voted for Gephardt, but Dukakis got 25 percent. Simon received 16 percent of the vote from the pro-Seabrook Democrats.

Among Republican voters, 49 percent support Seabrook to 41 percent who oppose it. Bush, backed by nuclear proponent Gov. John Sununu, carried 40 percent of the pro-Seabrook Republicans, while Bob Dole had only 25 percent. Dole won 40 percent of the anti-Seabrook GOP vote.

Among the cities, Bush lost only Keene to Dole, 35 percent to 39 percent. Statewide, Bush won, 38 percent to 29 percent.

CBS News-New York Times exit polls showed that one-fifth of

Tuesday's Democratic voters are former Massachusetts residents. Of these, 40 percent voted for Dukakis, 13 percent for Gephardt and 18 percent for Simon.

The surveys also showed that 55 percent of the voters rated Dukakis' performance as governor excellent or above average. Of these, 59 percent voted for him.

A strong economy was cited as the prime issue with 23 percent of the Democratic voters. Of those, 50 percent voted for Dukakis.

In terms of organization, 42 percent of those voting for Dukakis said his campaign had contacted them and asked for their support. Among those who voted for other

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Primary to Page 6

Letters to the editor

Chamber support

To the editor:

I was one of many area business persons who attended the Greater Somersworth Chamber of Commerce meeting on September 1st, which easily filled the conference room at Suzelles Restaurant. The first official meeting of the new chamber was greeted with a great deal of support. Since this get together the support and enthusiasm has continued to grow.

This is why I was quite disappointed with the headline and tone of Foster's coverage of that September 1st meeting. It did not read like the same event that I attended because the negative slant of the story was very misleading. The new chamber has received generous support from Foster's in the past and it is hoped that this article is an unfortunate isolated incident. Certainly a viable Greater Somersworth Chamber of Commerce is the best interest of the whole community.

The purpose of the meeting was to get the word out and to encourage participation and this was achieved. The steering committee has worked long and hard but it is not a small closed group. Membership in the chamber by area businesses is the next most important step that can be taken and those wishing to take a more active role are welcome.

A viable chamber can only benefit the towns of Somersworth, Berwick, Rollinsford, and South Berwick. Our interests are mutually linked and can best be expressed by joining together. Our goal, for example, is to encourage revitalization of the downtown areas. The tax base will be expanded and, in the case of Somersworth, will positively influence the development of the Idle mill project. It is important that area citizens realize that services and businesses are available in our towns and not just on Central Avenue. This is one of many goals that this chamber will address.

I am a member and if you are interested in your community you should be too.

Robert C. Wyand
Somersworth

Nuclear militarism

To the editor:

It is well to keep in mind the midst of private corporations and political structures with whom we as the public must deal in the course of everyday life, and remain aware that as we do we deal also with their past and that of their personnel.

Illustrating this situation is the nuclear industry, and the nuclear power plants it builds, with its military heritage, as many of its personnel have military backgrounds. Thus it would be inevitable that they would tend to conduct themselves in a military fashion, though now in a civilian context. If we expect democratic, egalitarian conduct or view of the public from whole entities or from their prominent figures, still operating in their former, authoritarian, hierarchical, militaristic posture, then we will anticipate from them what they will not deliver.

Born to visit military destruction upon the Japanese civilians in WWII, the nuclear industry has never civilized either its authoritarian methods, its products or its psychology of secrecy and operational seclusion. Seabrook Station is a "military" establishment, with armed guards, razor-wired fences, proximity alarms, metal detectors, protocols of accessibility; procedures managing and controlling "civilians", triage of potential victims of its failed workings, thyroid blocking iodides for the effects of its Plutonian chemistry on human life and a military arrogance of "manifest destiny" toward a "properly-docile" civilian population.

Who are some key figures? They include John Sununu, former military-school student-brigade commander, now commandant of New Hampshire; Edward Brown, West Pointer, commandant NHY; Judge Helen Hoyt, ex-Army judge; Lando Zech, Adm USN, NRC Chairman. Former military, nuclear-science ranks and ratings flesh out both federal and state bureaucracies.

While not an anti-military diatribe, this cautions a civilian Republic to beware nuclear technology's inherent militaristic totalitarianism. Dire technology invokes dire constitutional consequences.

John E. Loder
Rollinsford

Don't drug children

To the editor:

How psychiatry is making drug addicts out of our children.

There are countless children in this country on a very dangerous psychiatric drug. They are the unwitting guinea pigs of an experiment which is turning into a nightmare of monstrous proportions.

Over the past 10 years, psychiatry has shifted its income base from primarily treating adults to primarily treating children. This has been made possible by group medical plans which have recently included coverage for psychiatry.

Under psychiatry's invented criteria, there isn't a single normal childhood behavior which doesn't fall within the broad "symptoms" which comprise "mental illness." Once a child is diagnosed, the destiny of that child is no longer in the hands of his or her parents, and are very likely to be put on a very dangerous and addictive drug called Ritalin.

There are alternatives to children being drugged. Extensive information is available on the alternatives, but the first alternative is to "not drug the child."

Anyone concerned about this issue, please feel free to contact me.

Jessica Byrnes
Martel Road,
Chicestser, N.H.

Vital resource

To the editor:

Once again, the record high temperatures have shown us that we can indeed scrape the bottom of the electricity barrel. New England does not have an unlimited supply of energy.

Turning off the air conditioner for a few hours is uncomfortable, but I shiver to think of similar circumstances on a record-breaking cold winter day.

New England needs the power that can be produced at Seabrook Station. This is now clear.

I hope the politicians will not stand in the way of this resource that is vital to our region.

Judy St. Laurent
Hampton

n's battle against bureaucracy

Since the GSA's blueprints were drawn in 1948, agency officials had made many changes intended to update the building. In fact, during the year of construction, the GSA caused more than 60 delays for changes in the plans.

Normally, when a government contract is delayed, the completion date

His bonding company lent him \$1.8 million, with his property as collateral. But with an outstanding loan, Purvis could no longer get a construction bond - and without a bond, he could not get new contracts. When the loan came due, he signed his property over to the bonding compa-

said he never lost faith that he'd eventually be paid.

But there's still a hitch. Congress must authorize the payment of Purvis with a private relief bill. Rep. Larry Craig, R-Idaho, and Sen. James McClure, R-Idaho, have introduced legislation, but only about one

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PORTSMOUTH
HERALD (NH)
MAY 10, 1978

Public Forum P 14

The Herald

MAY 16, 1978
Portsmouth City Council voted a proposed growth control act setting a one-acre minimum requirement for zoning. All members opposed to the bill argued that it was cost-prohibitive.
Portsmouth bill to make families with children living on Pease Air Base pay tuition if the federal government doesn't fully fund it, argued for the city, has been ruled unconstitutional by the Supreme Court.

MAY 16, 1963
Governor King's office mail may be winning 97-3 in favor of the operated lottery, but a survey of the nation's top newspapers tells a different story. Their editorial boards run 17-0 against New Hampshire and its get-rich-quick scheme.



John Beer
C. BEERMAN, JR.
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lunch with my

Ft. Foster

To the Editor:
What a suprise to learn Monday night at the Kittery Town Council meeting that they are considering insect control at Fort Foster. In all the years we've been going there, we've never been annoyed by insects. Why not save an estimated \$7,700 per year and just leave earlier in the evening before the mosquitoes come out for their nighttime snack.

Cassie Lutts
Kittery Point

Graduation

To the Editor:
Exeter's Project Graduation is well underway. The Project Graduation Committee would like to thank all area businesses and parents for their generous contributions. As you know we are offering two fun-filled evenings of activities following the senior prom and graduation. Because of the support the community has given us, we are able to give our seniors an exciting, memorable time.

Following dinner and dancing at the Greenhouse, seniors and their guests will be transported to the Speakeasy until 5 a.m. There will be dancing, a casino night, Water Country activities, plenty of food, plus prizes: concert tickets, tape cassettes, a color t.v. and much more.

Following graduation, the graduates and their guests will be transported to Great Bay Racquet Center for another fun-filled evening of entertainment until 6 a.m. There will be dancing to "The Now Sound Express," and the facility will be open for swimming, basketball, VCR movies, ping pong, jacuzzi, volleyball and walleyball. There will be food, beverages and prizes drawn throughout the night. The grand prize will be a vehicle donated by the used car division of Foss Motors. All seniors are eligible to win, the only qualification is that they must be there.

We are very proud of the Class of '88, and invite all seniors and their guests to these two exciting evenings.

The next meeting for parents on the Project Graduation Committee is Wednesday, June 1, 7 p.m. at Exeter AREA High School. All interested are welcome to attend. If anyone has questions pertaining to one or both of these evenings, contact Karen Felletier at Exeter AREA High School.

Congratulations to the Class of 1988!!!

The EAS Project Graduation Committee

Walter A. Borkowski, Principal
Exeter Area High School

Rebirth?

To the Editor:
Portsmouth Herald, May 8, ran a timely article titled "Nuclear Industry Planting Seeds for a Rebirth." Describing the dormant nuclear industry's fervid hope for a new energy crisis and its possibilities for renewed public support for new nuclear power plants, it quotes data from a recent meeting of the Nuclear Power Assembly claiming broad public support for nuclear power.

There, Robert K. Campbell, CEO of Penn Power and Light, praised the industry's victories in Congress this year, intending to push them toward further legislation advantageous to nuclear power.

Earlier, the pro-nuclear U.S. Council for Energy Awareness announced a 1988 \$8.3 million media blitz to reseed the public on nuclear power, "emphasizing good news about nuclear energy," though elsewhere CEA's pollster Eugene Pokorny says it will inspire "a grudging acceptance of nuclear power ... You want to create a sense of inevitability ... building from a perceived-need argument with safety considerations being secondary." (Nucleonics Week, 11-26-87).

CEA plans to target what it calls

percent at Grade GS-2 to 33 percent at GS-7, to 42,000 clerks and secretaries in the Washington area.

Charles Levine, distinguished professor of government and public administration at Washington's American University said "Women are leaving the clerical market in droves" ... said he was "nonplussed that some think the quality of job applicants is getting better." ... said the 37 percent reporting applicant quality as unchanged or improved "could reflect the tremendous geographical distribution of the federal work force."

A similar theory was offered by Ray Kline, president of the National Academy of Public Administration, who said: "We've got to stop generalizing. There are sections of the country where managers are very pleased with the quality of new people. And there are some major cities where things are really rough."

The National Federation of Federal Employees has lashed out bitterly at plans of the Social Security Administration to close 1,300 regional offices, and replace them with 20 teleservice centers and a mammoth national telephone center.

It said Social Security pensioners and applicants for SS pension now have the option of visiting any of the regional offices, or doing business by phone. Obviously, it said, they visit the centers only when they doubt Social Service's phone service can provide the answers they seek.

The union said the Social Security

"information seekers" and "opinion leaders" among the public, in selected print media and broadcast vehicles, preferably attracting them during "special event" programming rather than in news-oriented slots. Centering on the theme of national energy independence, it plans on at least three exposures of material to bring favorable public action.

Meanwhile, just published is *Friends in High Places: The Bechtel Story*, by Laton McCartney. This portentous work describes the revolving-door connection between the nuclear industry and the federal government. The Bechtel Corporation, largest nuclear plant con-

tractors continued to believe they would settle on a three percent for both civilians (white and blue collar) and military personnel, instead of President Reagan's proposed two percent for civilians and 4.5 percent for the military.

In a recently-released report commissioned by the Office of Personnel Management, the consulting firm of Towers, Perrin, Forster, and Crosby says government's health insurance program for its employees rips off both the government and employees. Among other things, it says:

- The program's costs are \$875 million annually higher than they should be, and overcharges will continue to rise unless the program changes direction. (Employee premiums rose an average of 31 percent this year.)
- With 480 plans in the program, healthy employees seek the cheaper plans while those with health problems must rely on high-cost plans.
- This violates the basic principle of group insurance which is to spread the risk among large groups. The program encourages the violation of offering employees an annual "open season" during which they can "plan hop."
- Administrative costs of the government plan are twice those of private insurance.
- One source of the program's excessive costs is a provision allowing unions to offer "associate membership" fees, up to \$30 annually, to non-members who find union plans attractive.

structor, by 1987 clear of recession woes, emerged triumphantly ready for new work. Is much imagination required to locate authorship for media extravaganzas, corrupt pressure upon government, obstructive regulatory rule-changing and arrogant utilities imperialism when the nuclear dragon is cornered and must fight for its life?

Buyer beware sellers of snake oil.
John E. Loder
Rollinsford

