

DOCKET NUMBER  
PROPOSED RULE PR 50  
(53 FR 16435)



DOCKETING  
BRANCH

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Cumberland Chapter

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21 May 1988

OFFICE OF PUBLIC AFFAIRS  
DOCKETING & SERVICE  
BRANCH

Samuel J. Chilk, Secretary of the Commission  
US Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

RE: CFR part 50, Emergency Planning and Preparedness  
Requirements for Nuclear Power Plant Fuel Loading and Initial  
Low-Power Operation

The Cumberland Chapter of the Sierra Club is opposed to the  
proposed amendment to the emergency planning requirements for  
nuclear power plant fuel loading and low power operation. Our  
reasons include the following:

The current proposed change appears to be an attempt to  
address the situation at the Seabrook plant, where accident  
warning sirens are absent. The Seabrook licensing issue should  
be dealt with in the context of the Seabrook adjudication not as a  
rule change that will affect all new plants.

It is completely illogical not to have the same  
emergency planning requirements for fuel loading and low-power  
operation as for full-power operation. Running a reactor that  
does not meet full-power requirements at low power contaminates  
it with radioactivity before it is known whether it will ever be  
able to operate as planned. The nation will have more than  
enough plants to decommission without decontaminating plants that  
have run only at low power for a few months.

Accidents can happen at low power as well as at high  
power. The start-up of any operation is a vulnerable time.  
Moreover, sabotage is always a possibility. If the population  
needs to be able to be notified when a plant is operating at high  
power--and they certainly do--they need also to be able to be  
notified when it is operating at low power.

*Mary Davis*

Mary Davis  
Nuclear Issues Chair

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