

107

DOCKET NUMBER
PROPOSED RULE **PR 50**

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DOCKETED
USNRC

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MAY 31, 1988

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

SAMUEL J. CHILK
SECRETARY OF THE COMMISSION
U. S. NUCLEAR REGULATORY COMMISSION
WASHINGTON D C
20555

ATTN: DOCKETING AND SERVICE BRANCH

GENTLEMEN:

I FIRMLY OBJECT TO THE CHANGES PROPOSED IN 100CFR PART 50 FOR THE FOLLOWING REASONS:

1. THE NRC IS USING A GENERIC RULEMAKING TO ADDRESS SITE SPECIFIC PROBLEMS POSED BY THE SEABROOK PLANT. THE RULE WOULD THUS APPLY TO ALL FUTURE REACTORS AND WOULD BRING ONE-STEP LICENSING ONE STEP CLOSER.

THE PROPOSED RULE PRESUMES MATERIAL ISSUES OF FACT WITH REGARDS TO THE LIKELIHOOD OF AN ACCIDENT AT LOW POWER AND THE LIKELY SCENARIO OF SUCH AN ACCIDENT.

3. IN 1982, THE NRC RECOGNIZED THAT, "REVIEW OF LICENSEES' ONSITE RESPONSE MECHANISM WILL NECESSARILY INCLUDE ASPECTS SOME OFFSITE ELEMENTS." AMONG THE OFFSITE ELEMENTS CITED BY THE COMMISSION WAS THE MEANS TO PROVIDE EARLY NOTIFICATION AND CLEAR INSTRUCTION TO THE POPULACE, I.E. SIRENS. UNDER THE PROPOSED RULE, THE NRC WOULD NOT REQUIRE SUCH OFFSITE ELEMENTS BE TAKEN INTO CONSIDERATION. LOW-POWER OPERATIONS ARE NO SAFER NOW THAN IN 1982, YET THE NRC HAS FAILED TO PROVIDE ANY FATUAL BASIS FOR REVERSING ITS POSITION.

4. THE MERITS OF OFFSITE EMERGENCY PREPAREDNESS WILL HAVE TO BE ADDRESSED EVENTUALLY. ALLOWING LOW-POWER OPERATION UNDER PROPOSED RULE MERELY CONTAMINATES THE PLANT WITHOUT ANY ASSURANCE THAT IT WILL ERVEROPERATE AT FULL-POWER.

5. IF AN ACCIDENT WERE TO OCCUR AT LOWPOWER WITHOUT EMERGENCY PLANNING, PREPAREDNESS OR NOTIFICATION, PANIC WOULD UNDOUBTEDLY ENSUE.

6. AT LOW POWER EMERGENCY PLANNING AND PREPAREDNESS WOULD BE IMPERATIVE IN THE EVENT OF A TERRORIST ATTACK OR SABOTAGE.

I REQUEST THAT THESE REMARKS BE INSERTED INTO THE RECORD AND THAT I BE INFORMED OF FURTHER DISCUSSION OF THIS SUBJECT AND PLACED ON THE MAILING LIST FOR DOCUMENTS PERTAINING TO THIS SUBJECT. IF THE COST OF THE DOCUMENTS EXCEEDS \$5.00 PLEASE NOT. Y ME PRIOR TO FORWARDING THEM.

PLEASE ACKNOWLEDGE RECEIPT OF THIS LETTER AND THAT IT WILL INSERTED INTO THE RECORDS FOR THIS RULE.

YOURS TRULY
Walbridge J. Powell
WALBRIDGE J. POWELL

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