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PROPOSED RULE

50

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USNRC

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

May 24 1988
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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

RE: **Comment on Proposed Rule amending 10 CFR Part 50,
Emergency Planning and Preparedness Requirements for
Nuclear Power Plant Fuel Loading and Initial Low-Power
Operations.**

The NRC requires, prior to fuel loading and low power, that a finding be made to report on the licensee's plans and state of preparedness for 1) dealing with accidents and 2) coordinating offsite personnel and agencies.

In the Federal Register, Vol 53 No. 89 p. 16435, you ask "whether this prior practice should be discontinued or modified" because "there is a low degree of risk posed to offsite persons by fuel loading and low power operation (up to 5% of rated power)."

At first glance, it makes sense that a nuclear plant operating at low power should be a lower risk to the surrounding population than a plant operating at full power. A child playing with a match and candle is certainly "several orders of magnitude less" risky than a child playing with a match and firecracker or a stick of dynamite. However, fire is fire and the "low-power" child can destroy a house or neighborhood almost as efficiently as the "full-power" child equipped with explosives.

Although "nothing in the proposed rule is intended to change the emergency planning standards which must be satisfied before operations at full power," I wish to take issue with several assertions made in your proposed rule's Supplementary information.

In Section B: the absence of sirens around Seabrook is indeed worrisome. Halfway down Section C: "Third, the time available for taking actions to identify accident causes and mitigate accident consequences is much longer than at full power. ... In the worst case, the additional time available (at least 10 hours) ... would allow adequate precautionary actions to be taken to protect the public near the site." Without precautionary measures like sirens, how would a household find out that a leak occurred at the low-powered nuclear plant at 7 p.m. if the residents go to bed without watching the evening news? No sirens... and 10 hours after the beginning of a 7 p.m. accident means that the household would be at risk after 5 a.m. Farfetched? Without sirens, without including all "offsite elements" of an emergency plan (that are required for full-power licensing), and without concerned neighbors, how would that family know to evacuate?

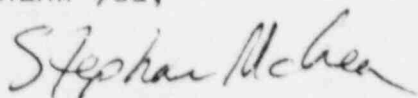
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In section D, first paragraph: "The proposed rule requires NRC findings on the applicant's onsite plan and only those offsite elements of that plan which would reasonably be expected to be needed in the event of a radiological emergency at low power." If the NRC is seriously interested in coordinating all elements that will be needed at full power, it makes sense to include these offsite agencies and authorities during low power emergencies. If the NRC drops the requirement for making a finding (at low power) on ALL offsite elements, then isn't it possible that the NRC might be surprised to discover in a later, more comprehensive, finding that certain offsite elements (omitted from the low-power finding but now included in the full-power finding) do not coordinate well, and that the license for full-power should be withheld? Wouldn't it make sense to look at all risks ahead of granting permission to operate at low power?

In most countries, the concept of a comment period is quite foreign. It is indeed a privilege as a human being for me to submit these comments for your consideration. However, since I am a citizen of the U.S., this comment period is in fact my right under law, and I therefore respectfully remind the NRC that any discourteous tone in this comment is simply an irritated citizen annoyed with your agency's attempt to move closer to one-step licensing. I intended to file a polite comment. However, please remember that, although the NRC Commissioners are also citizens of the U.S., they are appointed by politicians who were elected by people like myself. In an extended sense, our relationship is more than "me petitioner, you agency official." It's also "me voter, you appointed-person-who-must-look-after-the-public's-best-interest." So, as a member of the public that you seek to protect, I am requesting that you reject this proposed rule. I believe the proposed rule could be used to intimidate state and local officials into submitting what they may believe are incomplete plans for emergency preparedness. The proposed rule would also allow low-power operation which contaminates the facility and reduces the possibility of converting the plant to an alternative fuel.

Thank you for providing the public with this comment period. Although it is your responsibility as Commissioners to offer this comment period, I cannot help but feel grateful to be an American and to have my comments considered during this significant moment in the evolution of our nation's energy policy. I repeat: **it would be a step backward to approve this rule change.**

Thank you,



Stephan McCrea
Suite 146, 5100 NW 33rd Avenue, Ft. Lauderdale, Fla. 33024