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Secretary of the Commission
Attn: Docketing & Service Branch
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

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DOCKET

BRANCH

Re: Seabrook, N.H. Nuclear Power Station
Low Power Testing

Dear Sir or Madam:

This letter is written in support of the "Clarification of Emergency Planning Requirements for Low Power Licenses" proposed by the NRC.

Approval of this rule will eventually enable the Seabrook Station to contribute that critical boost to its service area's power supply for which it was intended.

New England needs all the power it can generate. As expressed in the Wall Street Journal of 31 May 1988, the safety issue used by Dukakis et al. to block the start up of Seabrook has been a "red herring" from the very beginning. (I enclose said article)

I applaud the intentions of the NRC in proposing the above mentioned rule & urge the NRC not to be swayed by the self-serving short term oriented proclamations of Messrs. Cuomo & Dukakis.

P.S. As of this writing, approx 50 coal miners died in a mining accident (methane gas explosion) in West Germany which, incidently, has one of the strictest safety codes on this planet.

Sincerely,

Ernest Mootz

REVIEW & OUTLOOK

Lights Out

Politicians — prominent among them Mario Cuomo and Michael Dukakis — have managed to beach two big East-Coast nuclear-power projects, Shoreham and Seabrook. New York State and Long Island Lighting Co. agreed last week to close Shoreham. The plant cost \$5.3 billion to build, but it will never illuminate a single light bulb. "Shoreham has to die, Shoreham will die," Governor Cuomo the nuker proclaimed. Citizens who ~~otherwise~~ would have benefited from ~~its~~ its now seem likely to be awarded ~~in~~ honor of paying higher taxes and utility rates for nothing. But there is more fun coming. Those same ratepayers and taxpayers also can look forward to power shortages this summer.

John Siegel, vice president for technical programs for an industry group called the U.S. Council for Energy Awareness, predicts brownouts over extensive parts of the Northeast if temperatures rise to levels that bring about maximum use of air conditioning. The problem will be more general than the limited difficulties experienced in New England last year.

Because the electrical-utility industry developed a substantial surplus of capacity at the beginning of this decade, politicians have played the no-nukes game with blissful unconcern over the threat of shortages. But such follies usually bring a day of reckoning. This one is no exception. Now those same politicians can look forward to prospects that the Northeast will be a less attractive region for industrial development because of uncertain prospects for power.

The two governors reckoned without several factors. First, Reaganomics has produced a far more sustained and vigorous economic recovery than they ~~imagined~~, particularly in the Northeast. ~~Second~~, U.S. manufacturing industry has received a boost from the softer dollar and rapid modernization programs, which means that electricity usage relative to GNP growth is substantially higher than projected. Energy-intensive basic industries, such as steel, have enjoyed a comeback.

Through not taking sufficient account of this resurgence, the Department of Energy's Energy Information Administration (DOE/EIA) and North American Electric Reliability Council (NERC) consistently have been underestimating growth of electricity usage. NERC forecasts electricity demand growth averaging 2.1% a year between 1987 and 1996 and on

that basis no new supply is needed on a nationally averaged basis before 1996.

But as Mr. Siegel points out, electric sales last year actually grew by 4.5% from the year before, about double NERC and DOE estimates. "And for the first quarter of 1988," he said in a recent report, "electric sales grew 7.4% vs. a DOE/EIA forecast."

Mr. Siegel thinks it's reasonable to expect electricity growth averaging about 4% in the years just ahead. But projected additions to supply are only 43,000 megawatts. Moreover, that includes both Seabrook and Shoreham. Unlike the presumably "dead" Shoreham plant, Seabrook may still operate even though its principal owner, Public Service Co. of New Hampshire, was forced to ~~close~~ Chapter 11 by the roadblocks set up by Dukakis et al.

The capacity ~~addition~~ includes as well 8,000 megawatts of fossil-fueled capacity not yet under construction. Coal plants also could face delays as a result of continuing uncertainties about what environmental requirements utilities will have to meet.

The upshot of all this is that Mr. Siegel figures that the nation as a whole, on average, will lose its 15% safety margin in electrical generating capacity only three years from now. The Eastern seaboard will lose it even sooner, and quite soon indeed if Seabrook is not allowed to operate and colorful lichens take over the Shoreham facility.

The political blockage of new generating capacity would have been more excusable had there been legitimate reasons for doing so. But the so-called "safety" issue has been a red herring from the beginning. There hasn't been a nuclear-radiation fatality in the U.S. in 30 years. Even the Chernobyl fiasco, brought about by an incredibly unsafe Soviet design, killed only 31 people, far fewer than will die this year in the U.S. from coal-industry accidents. Other nations — France, South Korea, Japan, Britain — are pressing ahead with nuclear-power development with none of the political paralysis that has occurred in the U.S.

The U.S., for its part, can look forward to brownouts and, possibly, retarded industrial development. Maybe Mike Dukakis and Mario Cuomo will be able to explain all this away if the lights start flickering in July or August. But as a corollary to the maxim in economics, "There's no free lunch," maybe we should add, "There are no free rides in politics."