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(53 FR 16435)

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## Coalition for Nuclear Power Postponement

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June 2, 1988

Mr. Samuel J. Chilk, Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Docketing and Service Branch

Re: 10 CFR Part 50  
Emergency Planning and Preparedness Requirements  
for Nuclear Power Plant Fuel Loading and Initial Low-Power Operations

Gentlemen,

Little by little the NRC has whittled down rule after rule concerning Emergency preparedness around the nation's nuclear plants, and this time is no exception.

The importance of this rule's generic aspects and the time period allowed for comment are proof positive.

As in earlier statements, the Coalition feels that under no circumstance should fuel loading or low-power operation be permitted until and unless all on-site and off-site preparations are made for emergency readiness.

The NRC must be naive to think that given the financial considerations of Seabrook's operation, the Public Service Company of New Hampshire would wish to remain at low power any longer than is required.

If the necessary notification methods are not in place, intimidation of State and local officials to implement previously rejected, inadequate plans may result in a seriously deficient situation around the reactor site.

The Coalition does not agree at all with NRC's assessment of dangers present during the operation stages in question. Furthermore, in light of intense local opposition to the operation of the Seabrook Station, the Coalition feels that the contamination of the reactors by fuel loading before alternatives are adequately considered would doom the chances of them ever being converted. The most important factor that arises from all of this is that the entire site will be forever assured of becoming a nuclear garbage dump if operation becomes financially prohibitive.

The dangerous generic precedent set by this proposed rule is a smoke screen for a concerted effort to license the Seabrook Plant against wide-spread grass-roots opposition and therefore the proposal should be thrown out in its entirety.

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Respectfully yours,

Donald C. Frisco  
President

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