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OFFICE OF SECRETARY
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Secretary of the Commission
Attention: Docketing and Service Branch
United States Nuclear Regulatory Commission
Washington, DC 20555

Proposed Rule 53FR16435 re:
Emergency Planning and Preparedness
Requirements for Nuclear Power Plant
Fuel Loading and Initial Low Power Operations

Gentlemen:

This communication is in support of your proposed rule that would eliminate the requirement for prompt notification of the surrounding populace as a condition for fuel load or initial low power operations at commercial nuclear generating stations.

Further, the proposed rule would make it clear that, for fuel load or initial low power operations, it is not necessary for a plant to have the same full-scale public notification system in place that is required for full-power operation because:

- The NRC has determined that the risk to public health and safety from low-power operation at any nuclear power plant is significantly lower than at full-power.
- The time available for taking any emergency action would be much longer (at least hours) than if the plant was in full-power operation.
- Safety systems in nuclear plants are designed to handle 100% power emergencies. During low-power testing, the plant never exceeds 5% power and testing takes only a matter of days.

At Seabrook Station, the risk is even lower than for other sites. New Hampshire Yankee (NHY) studies show that:

- In the unlikely event that all safety systems fail, it would take longer than 24 hours to cause serious damage to the plant.
- The strength of Seabrook's containment structure is so great that, even without any safety systems, the containment would not fail during any event at or following lowpower operation.

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In addition to these points, there are several others that can be made about Seabrook:

1) NHY has a fully operational siren notification system in place in New Hampshire, and has submitted to the NRC a detailed explanation of how they will compensate for the deliberate dismantlement of an operable siren system in Massachusetts.

2) The Emergency Broadcast System (EBS), used to provide information to both New Hampshire and Massachusetts communities, is in place and provides 24-hour-a-day coverage, backed by emergency power.

3) The proposed rule would not lessen the effectiveness of emergency preparedness around Seabrook, or any other nuclear power plant. It merely clarifies the NRC's original intention regarding public notification requirements that must be met prior to low-power testing.

The proposed rule will clear up any confusion over the public notification system requirements for low-power testing. I support any effort to reduce misunderstanding. New England needs the power Seabrook will provide. Seabrook is complete, fueled and safe. It's time to say "yes" to the proposed rule, and "yes" to the opening of Seabrook.

Sincerely,

J. H. Moody

J. H. Moody
897 Washington Road
Rye, NH 03870

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