

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

DOCKET NUMBER
PROPOSED RULE PR 50

(53 FR 16435)

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USNRC

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Dear Mr. Secretary,

'88 JUN 23 P6:49

I am writing this letter to voice my opinion concerning the proposed "Interpretation Rule." There seems to be confusion over the emergency planning requirements that must be met before a nuclear power plant is given a license to perform "low power" testing. It is very important that any misunderstanding of requirements be eliminated by the NRC.

I am specifically looking at the part of the proposed rule that would make it clear that for low power testing, it is not necessary for a plant to have the same full-scale public notification system in place as is required for full power operation. The NRC has already determined that the risk to the public health & safety from low power operation at any nuclear power plant is significantly lower than at full power. Also safety systems in nuclear plants are designed to handle 100% power emergencies. During low power testing, the plant never exceeds 5% power & testing takes only a matter of days.

at Seabrook Station, the risk is even lower than at NRC sites because studies show that in the unlikely event that all safety systems fail, it would take longer than 24 hrs to cause serious damage to the plant. Also the strength of Seabrook's double-walled containment is so great that, even without any safety system, the containment would not fail during low power operations.

In addition, Seabrook has a fully operational seven notification system in place in New Hampshire. Seabrook has submitted to the NRC a detailed explanation of how we will compensate for the deliberate dismantlement of an operable seven system in Mass. Also the emergency broadcast system used to provide information to both N.H. & Mass. communities, is in place and provides 24 hour a day coverage, backed by emergency power.

In short the proposed rule would not lessen the effectiveness of the Emergency Preparedness around Seabrook or any other nuclear power plant. It merely clarifies the NRC's original intentions by ordering public notification requirements that must be met prior to low power testing.

For Seabrook, specifically, the proposed rule will not decrease public safety in any way. Seabrook has already gone the extra mile to build the safest nuclear plant ever constructed. Seabrook has met every regulatory requirement. Seabrook has installed a public notification system very early on and saw it deliberately dismantled by the Commonwealth of Massachusetts in an attempt to block Seabrook's operating.

Seabrook has designed + submitted a new system to take the place of the original system. The proposed rule, when approved, will clear up any confusion over the public notification system requirements for low power testing.

I fully 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.

Thank you
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