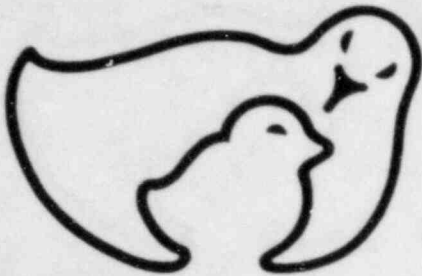


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Mothers for Peace



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	Docket Nos. 50-275-OLA
)	and 50-323-OLA
PACIFIC GAS AND ELECTRIC COMPANY))	ASLBP No. 86-523-03-LA
(Diablo Canyon Nuclear)	April 22, 1986
Power Plant, Units 1 and 2)	

MOTHERS FOR PEACE CONTENTIONS
ON PACIFIC GAS & ELECTRIC COMPANY'S REQUEST TO INCREASE
WASTE STORAGE BY RERACKING THE SPENT FUEL POOLS

1. The Applicant has not adequately considered alternatives to the proposed reracking of the spent fuel pools. In particular, because of the increased danger posed by the close proximity of the Hosgri fault, alternatives should be considered. Some alternatives include:

- a. The contracting out or trans-shipment of spent fuel for storage at a government owned spent fuel facility;
- b. Derating the facility or reducing the plant output and thereby reducing the generation of spent fuel.
- c. Closing or shutting down the facilities.

2. The Applicant failed to evaluate the overall cost (in terms of both health effects and potential associated medical costs) associated with the additional exposures of the plant personnel to increased radioactivity levels due to the increased spent fuel storage.

3. No analysis has been made of the overall costs (in terms of both health effects and potential associated medical costs associated with the additional exposures of persons off the Diablo Canyon site to increased radioactivity levels due to the increased spent fuel storage.

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4. The expansion of the spent fuel storage capacity will have a significant affect on the quality of the human environment and therefore requires the preparation of an Environmental Impact Statement.
5. Applicant's proposal does not ensure that spent fuel pool conditions will be maintained within regulatory or design limits in the event of a Class 9 accident or other extreme accident in the main reactor. The Applicant has not shown that in such cases the electrical systems, cooling systems and plant personnel will function sufficiently well to ensure continued safe operation of the spent fuel pools.
6. The application for reracking is premature in that no need for the immediate expansion has been shown. Applicant will have no need for the increased storage capacity for the next 4 years.
7. The NRC has ordered PG&E to conduct a long-term seismic program and submit the results of the study to the Commission by 1988. In view of the fact that the study is still in the early planning stages, any seismic analyses done on the spent fuel pools as well as on the racks are inadequate. It also makes consideration of reracking premature, and woefully inadequate.
8. The Applicant has not adequately considered or analyzed the long term health, safety and environmental effects of the proposed re-racking with respect to such periods of time over which the spent fuel pool is likely to be used beyond the expiration of Applicant's operating license.
9. The Applicant has not shown that people could safely be evacuated in the event of a simultaneous earthquake and accident at Diablo Canyon's spent fuel pools. Current evacuation times are inadequate to preserve the health and safety given the increased quantity of radiation that would occur with a spent fuel pool storage expansion.
10. The Applicant has not analyzed nor considered the consequences of an accidental impact from an aborted, misfired, misguided or exploded missile launched from the Vandenberg missile range. Vandenberg is a major launch facility for the U.S. Air Force, and soon will become a prime launching facility for NASA. Accidental explosions have been occurring with increased frequency.

11. In light of increased terrorist activities, the Applicant has not adequately analyzed nor considered the consequences of sabotage of the spent fuel facilities. The possibility of increased harm due to sabotage of the spent fuel pools will necessitate increased security measures over and above current forces.

Respectfully submitted,

Sandra A. Silver

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Mothers for Peace

cc: NRC Docketing and Service
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Sierra Club
CODES
ASLB