

BAY AREA CHAPTER

Northern California Association
To Preserve Bodega Head and Harbor

~~2731 Durant Avenue~~ Berkeley 4, California
2820 Telegraph Ave.

ADVISORS

October 8, 1963

Ansel Adams
David Brower
John Emmons
Harold Gilliam
Joel Gustafson
Weldon F. Heald
Joel Hedgpeth
Francis Herring
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William Penn Mott, Jr.
Thomas Parkinson
Kenneth Rexroth
T. Eric Reynolds
David E. Pesonen
Executive Secretary

Dr. Glenn T. Seaborg, Chairman
U.S. Atomic Energy Commission
Washington 25, D.C.

Dear Dr. Seaborg:

The San Francisco press has reported a discovery by the U.S. Geological Survey of an active earthquake fault within the excavation proceeding for the Pacific Gas and Electric Company's proposed power reactor on Bodega Head. The company's reply to this finding was distressing; C.C. Welchel, Vice President--Engineering, announced that the company intends to continue excavation and implied that they intended to disregard the findings of the U.S. Geological Survey.

Of perhaps even more concern, however, was the response of your office to this information. Several accounts quoted your letter to Mr. Carver of the Department of the Interior, to the effect that PG&E's excavation would be deepened, to determine the extent of faulting within the reactor site.

The reason for our concern is the obvious inference from your statement that the provisions of 10 CFR 100 governing reactor site criteria have no meaning. For example, despite provisions of 10 CFR 100.10(c)(1), that "no facility should be located closer than one-fourth mile from the surface location of a known active earthquake fault," PG&E has continued to excavate the site on Bodega Head, which is known to be less than one-fourth mile from a known active earthquake fault--one of the Earth's most active--the San Andreas. Now that the U.S.G.S. has found a fault within the reactor site, it would appear that the affair is closed and that the company must move elsewhere.

We commend to your attention the judgement of Dr. George W. Housner of the California Institute of Technology, PG&E's own expert, in his report to the company on this project (included in the Hazards Summary Analysis, Appendix C, AEC Docket 50-205):

"As regards gross ground movement produced by faulting, I would say that if there appeared even a small likelihood of this happening, then the site should not be used."

Purpose: To work for preservation of the scenic and historic headlands of Bodega Bay and to insure the
of the immediate marine environment

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And further:

"...It is quite impossible to design a power plant to survive without damage the large permanent ground surface displacement that might occur if the earthquake fault slippage occurred at the site."

Under what specific conditions would the AEC deny a construction permit for a nuclear reactor because of earthquake hazards?

It is misleading to suggest that the purpose of the present excavation at Bodega Head is to assess the extent of faulting. The company is obviously constructing a reactor and is looking at the nature of the bedrock to the same extent that a highway department would inspect a bed of fossils in the path of highway construction. The company has poured concrete, reinforced with steel, in a ring that is clearly designed to provide for laying up the frame of the vapor pressure suppression system--a permanent part of the reactor complex. This is construction, not geological exploration, and would appear to violate the provision of 10 CFR 50.1(b) which states:

"No person shall begin the construction of a production or utilization facility on a site on which the facility is to be operated until a construction permit has been issued. As used in this paragraph, the term 'construction' shall be deemed to include pouring the foundation for, or the installation of, any portion of the permanent facility on the site:..."

The present activity is clearly a violation of this provision. Since your agency appears to find that the licensing and regulation of reactors is exclusively reserved to the federal government, are you prepared to enforce the provisions of this regulation, promulgated by your agency?

It is becoming abundantly clear that this project has accumulated more momentum than a responsible utility management should have allowed. According to testimony by the company in a recent lawsuit in Sonoma County, "After February 9, 1960, the company incurred engineering, material, construction and miscellaneous expenses in the amount of \$1,586,648, all of which have been directly related to the proposed construction of the said facility, " in addition to a contract of approximately \$500,000 on the present hole. All of this has preceded even the scheduling of hearings by your agency on the safety of the installation.

This suggests that the project has gotten quite out of hand and that perhaps the utility management no longer exercises adequate control over it. The purpose of this letter is to suggest that the prerogatives of your agency be expanded to rescue the company from what has become an increasingly embarrassing mistake.

Sincerely,

s/David E. Pesonen
DAVID E. PESONEN
Executive Secretary

NORTHERN CALIFORNIA ASSOCIATION
TO PRESERVE BODEGA HEAD AND HARBOR

2820 Telegraph Avenue

Berkeley 5, California

Tel: TH 1-6399

PRESS RELEASE

(For Immediate Release)

San Francisco (Oct. 8)--The AEC was asked today to "rescue" the Pacific Gas and Electric Company "from what has become an increasingly embarrassing mistake" at Bodega Bay. The request was included in a letter to Dr. Glenn T. Seaborg, Chairman of the AEC, from the Northern Calif. Association to Preserve Bodega Head and Harbor.

The AEC announced last Friday that an earthquake fault had been found within the excavation by a U.S. Geological Survey team of seismologists and that the team leader, Dr. J.P. Eaton, stated that Bodega Head "is not an adequately safe location for a nuclear power plant."

"It is becoming abundantly clear that this project has accumulated more momentum than a responsible utility management should have allowed," the letter commented. Over \$2 million has been invested in what PG&E describes as "site preparation" before the AEC hearings on safety have been scheduled.

"It is misleading to suggest that the purpose of the present excavation at Bodega Head is to assess the extent of faulting," the letter charged. PG&E is obviously constructing "a permanent part of the reactor complex" in apparent violation of the AEC regulations on reactor licensing.

"Under what specific conditions would the AEC deny a construction permit for a nuclear reactor because of earthquake hazards?" the letter asks.

"Now that the U.S.G.S. has found a fault within the reactor site, it would appear that the affair is closed and that the company must move elsewhere," the letter stated. But the increasing company investment at Bodega Head "suggests that the project has gotten quite out of hand and that the utility management no longer exercises adequate control over it."

David Pesonen, executive secretary of the association and author of the letter, said at the time of the release: "If PG&E can't stop a reactor that isn't even built, how are they going to control it when it's finished."