

4-5-70
UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

PROD. & UTIL. FAC. 50-323

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File

IN THE MATTER OF
PACIFIC GAS AND ELECTRIC COMPANY
(DIABLO CANYON NUCLEAR POWER
PLANT UNIT No. 2)

Docket No. 50-323

Additional comments of Scenic Shoreline
Preservation Conference filed after the
receipt of the applicant's proposed
findings of fact and conclusions of law-
Request for reopening of hearing.

(1) Scenic Shoreline received an order dated March 18, 1970 "terminating recess of hearing." The order states: "On January 14, 1970, the Board recessed the hearing in this proceeding in order to evaluate the record and receive additional information requested from the parties. The evaluation having been completed and information received, the Board has concluded that the recess should be terminated and the record of the hearing closed and it is so ordered."

Procedure requires that "additional information requested from the parties" be circulated to the intervenors. Information requested from Pacific Gas and Electric Company by the Atomic Safety and Licensing Board has not been received by Scenic Shoreline Preservation Conference. Scenic Shoreline now requests this information.

(2) The March 18, 1970 order by your Board states that "...to grant the intervenor's request (for a third day of hearing) would be destructive of an orderly hearing procedure..." The hearing was originally recessed without a day set for

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continuance in contemplation of possibly calling at least another day of hearing. Later evidence requires that another day of hearing be scheduled. Scenic Shoreline requests that the hearing be reopened.

(3) Development of new evidence unknown to the parties at the previous hearings is necessary at a reopened hearing. Within four miles of the proposed Diablo site is an earthquake fault zone (Edna Fault) that has not been taken into account in the studies by Pacific consultants. Studies now indicate that this fault zone may have been active within the last 100 years. An offshore fault pointing toward the vicinity of Diablo Canyon has been active within the past year. There is reason to believe that the plants' seismic design criteria are not stringent enough to assure structural integrity in the event of the magnitude of shock that could be expected along these faults. Pacific testimony is deficient in failing to present information on these zones. It seems an untoward rush to consider the building of a second unit without further data on this matter. It would be far wiser to defer construction until the evidence has been heard in view of the magnitude of potential damage from a powerplant accident. To be taken into consideration ~~are~~ the scantiness of data on the record to date regarding the geology of the region surrounding Diablo Canyon, the lack of a Port San Luis Quadrangle showing detailed fault mapping, and the difficulty of obtaining geological evidence because of the reluctance of land owners to permit entry. The potential impact of these newly reported seismic factors should be reviewed at a new hearing.

(4) The public is entitled to see Pacific's evacuation plans

for the communities likely to be affected by an accidental release of radionuclides. These plans should be displayed and explained at a reopened hearing on plant safety factors prior to the construction stage.

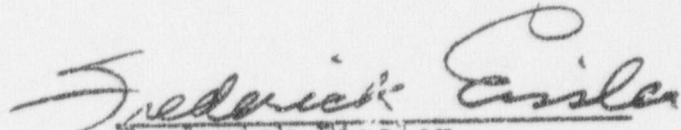
(5) Pacific asserts ("Proposed Findings of Fact and Conclusions of Law", March 20, 1970, Section 23, p. 12) :
"This (reactor containment) structure assures that essentially no leakage of radioactive materials to the environment would result even if gross failure of the reactor coolant system were to occur." In view of the findings of Advisory Task Force on Power Reactor Emergency Cooling ("Emergency Core Cooling", p. 6,b) further data on Pacific's conclusion seem warranted at a reopened hearing.

(6) New evidence on dispersal of radioactivity in the atmosphere over the San Luis Obispo-Santa Maria air basin in the event of an accidental release of radioactivity should be investigated especially in view of Pacific's assertion that ventilation at the plant site is adequate.

(7) The Federal Radiation Council has now decided to study the Gofman-Tamplin findings that recommend at least a tenfold increase in the strictness of powerplant radiation standards. The anticipated costs both to Pacific and the power consumer of retrofits and plant redesign to accommodate new standards affecting workers at the facility, the general public, and the environment, justify further public airing of these considerations.

(8) Further discussion and cross-examination of witnesses

on the subject of on-site storage and off-site transportation and disposal of low and high level radiation wastes are essential since the record on these matters is presently inadequate.


Frederick Eisler
President
Scenic Shoreline Preservation
Conference, Inc.

Dated at Santa Barbara, California
April 5, 1970