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March 15, 1979

Nuclear Regulatory Commission
Washington, D. C.

SUBJECT: Shutdown of Five Nuclear Reactor Powered Generating Stations - Protest of Order

Gentlemen:

This letter is for the purpose of expressing my serious objections to your subject actions.

I am a licensed Professional Engineer (NY 21822) and was formerly involved in design, construction, test and operation of Nuclear Plants at the management level.

Based on newspaper stories, and the poorly prepared electronic media reports, it appears to me that the NRC is trying to be absolutely safe in a world where this is an impossibility. Your unwillingness to accept the responsibility for evaluating and accepting a risk, no matter how small, without consideration of the benefits, is more like the action of a low level bureaucrat than of the type of executive expected at the Commissioners level.

Your lack of coordination with the President's attempt to reduce dependence on foreign oil shows a serious lack of concern for our great country.

It is my understanding that the design of the main coolant loops, steam and feed piping, instrumentation and all systems excepting only the emergency core cooling were based on criteria still considered proper. Your release and order did not so state. You did not state any value for the deficiency in the emergency core cooling, though it should be possible to approximate it. The words used were "less conservative". This approach to an engineering decision is ridiculous, just how conservative is sufficiently conservative and why.

I also believe that no one has criticized the strength of the piping only the strength of the anchors. This also makes me doubt the rationale for ordering the plants secured.

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The added "risk" to the general public assumes that an earthquake of sufficient severity to cause failure of core cooling would coincide with the random failure of the admittedly properly designed other systems, is so small as to be negligible. You must agree to that, as for example, in my 60 plus years of living in these areas I have never felt a noticeable earthquake. Therefore, your action must have an emotional, rather than a technical basis.

The risk to the general public of more fossil fuel being transported and burned in my opinion, far outweighs the nuclear risk, yet your opinion does not mention this.

The political risk importing an extra 100,000 BBL of fuel oil per day probably did not enter into your decision, but it certainly should have.

The added cost of power may cause elderly or low fixed income people to forgo some medicine, or food. This may be of no concern to you, but it should have been a part of your risk evaluation.

When will the commission stop acting as a tool of Nader's impossible dream, get down to earth, and accept the fact that everything in life carries some risk? I saw in the paper that some men for no apparent reason, stop breathing when asleep in bed, so even being in bed is risky. I commend to you Baron de Rothchild's latest speech in which he said that a windmill is more dangerous than a nuclear plant, and suggest that you revoke your previous order.

As information for improving plants becomes available, implement it where it is economically and technically feasible, on a rational, not emotional basis.

I am not against safety, just against stupidity, and safety at any cost. The one renewable resource in the world is people, and we will have to, sooner or later, decide how much of the non-renewable resources we will expend to save or lengthen one life.

Very truly yours,


Richard L. Katzenstein, P.E.