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ACCESSION NBR: 8107060424 DOC. DATE: 81/06/23 NOTARIZED: NO DOCKET #  
 FACIL: 50-361 San Onofre Nuclear Station, Unit 2, Southern California 05000361  
 50-362 San Onofre Nuclear Station, Unit 3, Southern California 05000362  
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 Office of the Secretary of the Commission

SUBJECT: Supports licensing of facilities.

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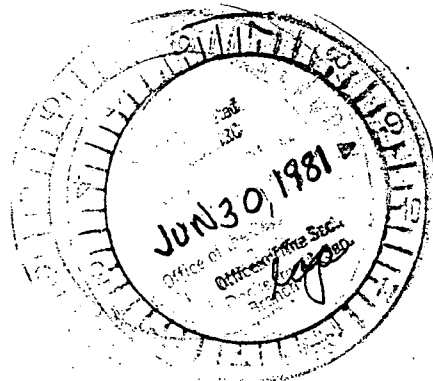
# CONSTRUCTION INDUSTRY FEDERATION

438 CAMINO DEL RIO SOUTH, SUITE 206, SAN DIEGO, CA 92108 (714) 299-5363

June 23, 1981

Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington D.C. 20555

Reference: Docket #50-361-OL  
                  #50-362-OL  
                  San Onofre Nuclear Station  
                  Units 2 and 3



Dear Sir:

Starting June 27, 1981 the Atomic Safety and Licensing Board of the Nuclear Regulatory Commission will conduct public hearings regarding the licensing of San Onofre Nuclear Generating Stations Units 2 and 3.

Unfortunately, I will be unable to present oral testimony at the hearings, but do ask that these written comments be considered a part of the public testimony and placed in the official record of the hearing.

The Construction Industry Federation, as the legislative representative for San Diego County's three major building organizations, supports the prompt licensing of San Onofre Units 2 and 3. The basis for our support is threefold.

I NEED:

There is a clear cut need for the generation of additional energy to serve the demands of the San Diego region. During the past decade population growth has outpaced the rest of California and most every other urban community in the nation. Population projections by the State of California and the San Diego Association of Governments (SANDAG) show that this growth will continue into the 21st century.

In spite of our fondest hopes, energy conservation and "alternate sources" alone will not collectively save and generate sufficient energy to meet future demand. New sources are needed in addition to conservation and the active pursuit of alternative and innovative energy sources.

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The building community is particularly concerned about the ability of the public sector and public utilities to provide needed public services in a timely and efficient manner. As the building community, the building trades, the would-be homeowner, and the renter are painfully aware that today's poor economy has virtually stopped the construction of needed homes in San Diego County. New home construction will not pick up until the economy turns around. All components of the urban infrastructure (including energy) must be ready and available to serve the "boom cycle" of construction activity when the economy is again healthy. It would be tragic if home construction was artificially restrained during the time of a healthy economy because a public utility was unable to meet legitimate consumer demands. It is difficult enough for the building community to keep pace with housing demand, let alone meet that demand, without the imposition of yet another artificial barrier. Licensing of San Onofre 2 and 3 will ensure that energy will be ready and available to meet the future demands of a prosperous economy.

## II COSTS:

All of San Diego is concerned about the cost of energy. San Diego Gas and Electric's rates are amongst the highest in the nation, because the utility is dependent upon foreign oil and inefficient, outdated power plants. San Onofre Units 2 and 3 will provide a partial remedy to both these problems.

Nuclear power is less expensive than energy generated from imported oil. It is also a more reliable source, whose supply would not hold this nation hostage to the whims of those countries marketing foreign oil. Just as there is no doubt that our national political and economic interests would be best served by reducing our dependence upon foreign oil, it is equally apparent that it is in the best interest of SDG&E's ratepayers to also reduce our dependence on foreign oil. Nuclear power accomplishes this goal.

Use of San Onofre 2 and 3 would also enable SDG&E to replace old and inefficient oil fired generating plants. Without San Onofre 2 and 3 it is doubtful if the utility could replace those facilities which are now wasteful, expensive and environmentally unsound.

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III ENVIRONMENT:


The San Diego region is confronted with a severe air pollution problem. The Construction Industry Federation has worked closely with air quality authorities and industry to clean up the air. Progress has been made, more is needed if we are to achieve EPA standards.

Dependence on fossil fuels for energy has contributed to our region's air quality problem. San Onofre 2 and 3 have the potential of helping solve this problem, and therefore should be licensed.

In conclusion, it is apparent to the Construction Industry Federation that San Onofre Units 2 and 3 should be licensed without delay. Operation of these two units will enable the San Diego region to meet its legitimate energy demands, to avoid needless energy cost increases, to improve the economy of the nation and this region, and to enhance the environment.

Your consideration of our comments is appreciated.

Sincerely,

  
Robert C. Cozens  
Legislative Director

RCC:gag