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SUBJECT: Provides comments on NUREG-0564, Suppl 2 & NUREG-0490, suppl  
 to DES. Several design features discussed to mitigate  
 accidents do not appear to be engineered safety features  
 which have fulfilled all general design criteria.

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*See below*

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Docket 50-382  
-387  
-388

Marvin I. Lewis  
6504 Bradford terrace  
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4-27-81.

Tedesco

Director, Division of Licensing  
Office of Nuclear Regulation  
USNRC  
Dear SIR;

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Please accept the following comments as my comments on both the Supplement 2 NUREG 0564 Supplement to DES Susquehanna Units 1 and 2, and also NUREG 0490 Supplement to DES San Onofre Units 2 and 3. Both of these NUREGS are very, very similar. In fact, they are exactly the same page for page. Except for using the number 7 in NUREG 0490 and the number 6 in Nureg 0564, they both have identical Table of Contents.

The use of ~~boilerplate~~ boilerplate (identical forms and wording) is acceptable in many instances. I do not believe that boilerplate shows reasonable care where human lives and the safety of the public is at stake. Boilerplate can too easily hide the reality of inadequate care and attention to detail. There is no way to see beyond the 'boilerplate' to verify the correctness of the prose and technical details.

Paragraph 7.13.1 (NUREG~~XXXX~~ 0490) 6.1.3.1 (NUREG 0564).

This paragraph in their respective NUREGs refer to mitigative measures included in the Design Features. Several of the design features discussed to mitigate accidents do not appear to be ESF, engineered safety features, which have fulfilled all the GDC, General Design Criteria. For a feature to be ESF and for that feature to be considered a mitigative feature in an accident, That feature must meet all applicable General Design Criteria. In both nuregs, mitigative features discussed in the Paragraph Design Features have not all passed ~~all~~ applicable General Design Criteria.

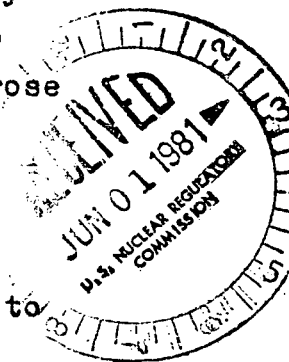
Apparently, some mitigative value is attached to non-ESF systems. This is in direct conflict with GDC requirements and the Atomic Energy Act.

Although there are many extremely misleading and error-filled sections in this ~~xxxxxx~~ report, I shall limit my comments to the very worst and most misleading paragraphs in these NUREGS: 6.1.1.3 (NUREG 0564) and 7.1.1.3 (NUREG 0490).

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Both these NUMREGS start the respective Health Effects paragraph exactly the same: "The cause and effects relationships between radiation and adverse health effects are quite complex but they have been more exhaustively studied than any other environmental contaminant." The point is not that radiation has been studied more than any other environmental contaminant, the point is what has this study accomplished. To understand what this exhaustive study has accomplished, we must look at what this exhaustive study was supposed to accomplish.

For instance the purpose and goal of a 1964 federal study of cancer and related radiation exposure among workers at US facilities was originally undertaken for 'Political' reasons; namely, to thwart workers efforts to obtain compensation for illness. These findings were reported by the House subcommittee on Health and the Environment in Feb, 1978 and confirmed by a Freedom of Information Request from Dr Mancuso and the Public Citizen Litigation Group. (Critical Mass Journal Feb 1979.)

Obviously research done for such nefarious and unworthy reasons cannot be trusted. This is the research that Dr Gotchy, who wrote this chapter, would have us believe. (NUREG 0564 Page vii)

The entire field of radiation research is tainted with questionable research by Government and other interests who have a stake in lulling the justifiable fears of an informed public.

I respectfully request that the reviewers of my comments read "SECRET FALLOUT" by Ernest Sternglass (McGraw Hill 1981.) The Government and the nuclear industries are still attempting to cover up the dangers of radiation. Dr Tokuhata (Penna Do Health) is still messaging data in a most sinuous way to come out with distorted data. (Commonwealth of PA, Testimony of Ge Tokuhata, NRC Docket 50-289, Submitted 4-16-81.)

To demonstrate the background that Dr Tokuhata comes from, he and the State of Penna are presently being sued for sex discrimination. This is the type of person that we are entrusting our radiation research to.

There has been good radiation research. The vested interests and the NRC have consistently shied away from any research that displayed radiation effects higher than those determined by Government and industry backed research. Even academia had fallen prey to being a vested interest. Funding is few and far between for researchers like Dr Rosalie Bertell, GSM.

Mancuso and Brous have gotten their funding cut off. Dr Sternghas has been the object of slurs and vituperation. Dr xxxgx Webb has xxx had difficulty finding employment despite unique credentials. Much good research has come from across the sea only to be ignored by the Atomic Establishment. (Heidelberg Report 1976 NRC Translation 520 T100 520)

Equally good research has been done in America and consistently ignored by the Atomic Establishment.

METHODOLOGIES FOR THE STUDY OF LOW LEVEL RADIATION IN THE MIDWEST  
Dixon Anvil Press 1979.

RADIATION STANDARDS AND PUBLIC HEALTH Proceedings of a second  
Congressional Seminar on Low Level Radiation 2-10-78 Lib of Congress.

Truly excellent and telling research has been accomplished in the USSR on the fauna and flora exposed to nuclear radiation in the release ata place called Kyshtym. How this release happened and how th research the data in the literature is detailed in an interesting book by Zhores A. Medvedev entitled NUCLEAR DISASTE R IN THE URALS.(Vantage 1980 )

All of these source s have been consistently ignored because the data show clearly that the effect of low level radiation is higher by orders of magnitude than that which the NRC used .

The remainder of the paragraph or section is as flawed as the opening sentence.

"10 to 500 xxxxxxxxxx potential cancer deaths  
per million person-rem"

In order to be "conservative," the highest number of deaths must be used in the calculations. The choice of "150" is not conservative! The same argument is valid for using 260 genetic changes per million person-rem instead of 220.

Disclaimer: I have neither the time nor inclination to comment upon all the insufficiencies, errors, and just plain lies in these NUREGS. This is a farce that will eventuall y take the lives of American Citizens just as surely as xxxr War.

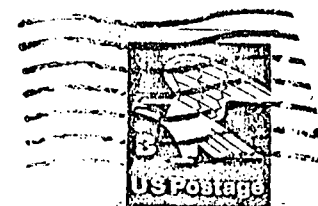
May God forgive this Great Evil of Nuclear Power for I do not have it in me to forgive this trespass against Mankind.

If anyone wishes to contact me confidentially, my number is  
xxx19x586xx 215 CU 9 5964. You need not give your name and all information will be used without giving the source.

For a better tomorrow,

Garvin I . Lewis.

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