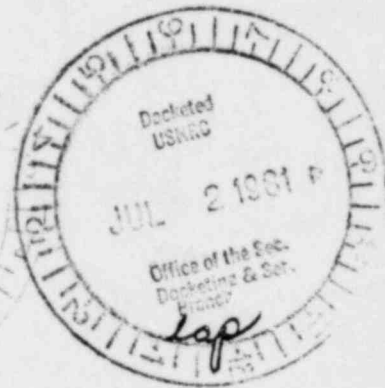


LEAGUE OF WOMEN
VOTERS OF ROCKFORD
ROCKFORD - ILLINOIS

BARKET NUMBER
PROD. & UTIL. FAC. 50-454-455
1907 Stratford Lane
Rockford, IL 61107
June 28, 1981

Secretary of the Commission
Attention of Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C., 20555



Dear Sir:

The League of Women Voters of Rockford Illinois strongly opposes the proposed regulation to permit Interim Licensing of Nuclear power plants because the thorough review and hearings needed for granting an operating license will become meaningless if delayed until after any type of fuel loading and power testing is allowed.

The Rockford League is an intervenor in the operating license for the Nuclear power station at Byron, Illinois. The contentions included in the League's intervention list unresolved safety problems which must be taken care of before fuel loading and operation to ensure a safe and economically sound plant.

Contrary to NRC reasons for proposing Interim Licensing, the League's contentions, based on a report of independent nuclear engineers, show that unresolved problems will cost several million dollars more to fix through backfitting or retrofitting after start up of the Byron Nuclear power plant. As the past record of nuclear power plants clearly shows break downs, slow downs and shut downs after the plants start operating can cause extra releases of radiation. They also cut the nuclear plant's capacity to produce power, as well as adding to the cost burden of consumers and taxpayers. If these problems are corrected now before start up of the nuclear plants, the NRC, Utilities and consumers will all benefit.

Specifically the League of Women Voters of Rockford objects to changes in the proposed rule which would:

- 1) limit cross examination of witnesses in hearings
- 2) allow the NRC staff to issue rules without the full review of the commissioners.
- 3) Prohibit formal discovery of NRC staff prior to licensing
- 4) delay implementing 3 Mile Island related safety requirements.
- 5) remove the Licensing Board's authority to pursue safety issues on its own.
- 6) restrict the Board's authority to consider generic safety issues.

The Kemeny Commission and Roganov Commission criticized the incentive present for utilities to ignore safety and speed up licensing. The Roganov Report called for more public participation, and this proposed Interim Licensing would cut the already limited access of the public to the licensing process.

Sincerely,

Betty Johnson

Betty Johnson, chmn. of the Byron Nuclear
Plant Intervention Committee of the League
of Women Voters of Rockford, Illinois