

Denton

June 8, 1982

The Honorable Renzio Palladino, Chairman
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Palladino:

Ohio Citizens for Responsible Energy ("OCRE") has become aware of the fact that the Clinch River Breeder Reactor, which was suspended by President Carter, has been revived and is now up for licensing. OCRE has also learned that the last environmental assessment of the project, the Final Environmental Impact Statement, was performed in 1977. Five years have past since that time. During those 5 years many changes have occurred in the legal and technical aspects of nuclear power, some of which are listed below:

1. the TMI accident, with the subsequent changes in focus of the NRC, e.g., the TMI Action Plan, increased awareness of human error, man-machine interface, etc.;
2. major changes in the design of the Clinch River reactor vessel and fuel core;
3. changes in NRC regulations, e.g., safeguards, safety goals, reactor siting, emergency planning, and accident risk reduction;
4. changes in the interpretations of NEPA, e.g., the 2 recent court rulings, on psychological stress and the S-3 Table;
5. changes in the economic picture for nuclear power, e.g., higher construction costs, lower demand for electricity, improvements in alternatives which make the breeder reactor the least desirable and most unnecessary option.

Obviously, the 1977 FEIS is outdated and inadequate. OCRE believes that a new draft supplement to the FEIS should be prepared, taking into account the numerous changes in circumstances regarding Clinch River and all other facets of nuclear power since 1977. OCRE urges that an updated environmental review be performed, and OCRE would like to receive this supplement and have the opportunity to comment on it. Thank you.

Sincerely,

Susan L. Hiatt
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