



Safety Goal Project.
45 FR 71023

May 22, 1981

Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Comment on 46 FR 18827 and NUREG 0764

Dear Secretary:

It continues to stagger the imagination that the United States is willing to enter into debate on the value of life versus the value of nuclear industry and technology. In reviewing "Development of a Safety Goal: Preliminary Considerations" (46 FR 18827) and Toward a Safety Goal: Discussion of Preliminary Policy Considerations (NUREG 0764), it becomes abundantly clear that the NRC is attempting to quantify the value of life; or at least to put it into a perspective which allows comparison of the risk of cancers, mutation and death due to radiation exposure to the need for electricity produced by nuclear power plants.

To make this even further ludicrous, there are other sources for the generation of electricity. We do not need nuclear power. Solar power, wind power and other forms of electric generation are available. Safe forms of electric generation which would not require "safety goals" are being used and could be further developed.

Particularly frightening is the notion that it is possible to develop a "safety goal". Numerous studies have shown that there is no safe exposure to radiation - that naturally occurring radiation (background radiation) presents the same risk of cancer just as a detonated nuclear bomb causes mass cancers. To be honest with the public, the NRC should speak in terms of "tolerable levels of radiation exposure; tolerable levels of cancers, mutations and deaths. Citizens will have a clear sense of their value in comparison to nuclear industry and weapons. The illnesses and deaths subsequent to exposure to radiation generated from the production of nuclear power and nuclear weapons is of less significance than the need for corporations to make money.

It was difficult for me to read these documents produced by people who are "policy makers" for the citizens of the U.S., and feel like they were concerned for my health, safety and welfare. The willingness to attempt to quantify an acceptable risk for exposure to radiation simply stuns me. I do not understand the value system which allows apparently intelligent persons to accept that nuclear power is here to stay and to, even in the face of overwhelming evidence of its dangers, attempt to establish "safety goals" to limit the number of melt downs, and other radiation-type exposure of local populations. Again, it staggers the imagination.

The only types of goals that should be developed are goals which address currently operating nuclear power plants. All plants

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which are built, but not yet operational (Diablo Canyon Nuclear Power Plant) should be converted to a non-nuclear fuel source. Any regulations developed and implemented should bear in mind that nuclear power plants are on their way out of use; that it has been determined that the risk generated by nuclear power plants is not worth the electricity generated by nuclear power plants.

The long-range and short-range health and safety of the population near to a reactor as well as the workers at a plant should be of primary concern to this regulatory body. No cost-effectiveness comparison applies when we talk of peoples lives.

My best recommendation to the Commission is to stop issuing permits to build and operate power plants, and to encourage the United States to develop alternative sources of energy. In addition, we should strongly monitor existing plants, closing them if there are more than 3 shut-downs per year. All plants should be decommissioned at the earliest possible date. Our health and safety as well as the health and safety of future generations depends on it.

Sincerely,

Cynthia Sharpe

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