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Secretary, U.S. Nuclear Regulatory Commission
Washington, D.C. 20555 Attn.: Docketing & Service

To the NRC Secretary:

'93 FEB 12 P2:39

In regards to your disturbing proposed rule (Federal Register notice 47802-47821), it is the height of folly to end the already too lax current linkage between accident radiation dose calculations and reactor siting. Since the current exclusion zone around nuclear power stations is an inadequate 0.4 miles, it should not be reduced even for reactors of about half of the common current megawatt size.

Not only should new nuclear reactors not be allowed at so-called "grandfathered" sites, but sites should not be "grandfathered" in the first place. The zone must not be reduced no matter what the reactor size. If a site has operating reactors that do not meet regulations, these should be shut down and certainly no more should be allowed to be built in the area.

The NRC is asking the wrong question about whether 30 miles is too far within which to consider whether population density is acceptable. If 30 miles was too far rather than too narrow a radius, why is the 50-mile ingestion pathway currently the recognized accident interdiction zone?

The 1979 proposed siting criteria is a lot more reasonable than the current density regulations and certainly more reasonable than the great densities allowed under this latest NRC-proposed rule change.

Need I remind the Commission about the 1979 Siting Task Force's suggestions of minimum standoff distance from major man-made and natural hazards. Reasonable interpretation of this should result in the closure of nuclear power facilities on the Pacific Rim in general--U.S. West Coast. Whether or not there is a blanket shutdown or prohibition of new nuclear reactors on the U.S. West Coast in general, certainly Diablo Canyon and San Onofre must be shut down--not only due to the high seismic activity in the general region but also because the largest faults besides the San Andreas Fault are just off the coast from these reactors, while splays from the Hosgri Fault at Diablo, and the Christianitos Fault at San Onofre run directly underneath at least one of the two reactors at these sites. Also, reactors must not be allowed near major airports, refineries, Liquefied Natural Gas terminals and pipelines, other petrochemical pipelines, and elsewhere.

The NRC is out of line ethically and constitutionally in their attempt to eliminate any power that state agencies may have in regards to proposed sites for new nuclear reactors. Unless states insist on more lax regulations than the feds, state rights must be vigorously defended.

The loosening and proposed loosening of NRC regulations regarding fire protection and environmental qualifications (and the realization of the severe danger involved with the Thermo-Lag which allegedly protects vital electrical cables from fire, but which repeatedly fail independent tests) reinforce my conclusion that no more loosening of regulations must be allowed--or that prediction of a 45% chance of a meltdown at a U.S. reactor by the first few years of the 21st century may well become true sooner rather than later--or both.

Sincerely concerned,

Bruce Campbell
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