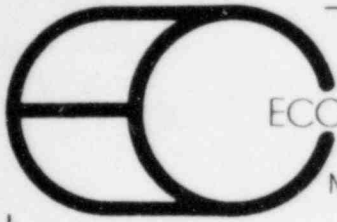


(NUREG-0956)



ECOLOGY CENTER OF SOUTHERN CALIFORNIA

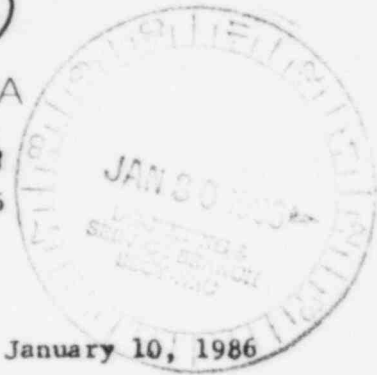
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January 10, 1986

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

Re: Safety Regulations

We understand the NRC staff recently issued a report designed to justify a severe reduction in nuclear reactor safety standards. We wish to comment in opposition to this NUREG-0956 "Reassessment." We believe the report contains many misapprehensions, and would like to list a few:

It is not true that the BMI-2104 computer codes represent a major technological advance. Due to far-reaching uncertainties in the current model, the new codes should never be used when they yield lower, less conservative results than the old standards.

It is not correct that principal omissions in the Safety methods have been corrected. The new computer codes do not satisfactorily model accidents that are initiated by "external events" (earthquake; sabotage.) By attempting to model severe accidents in greater detail, the new codes have introduced subjective factors and uncertainties which assume for example that radioactive iodine is released in the form of cesium iodide rather than the more volatile iodine gas. Recent research suggests this is a false assumption.

It is not true that remaining areas of uncertainties are all identified. In the months since the staff wrote this, new areas have already been identified.

We hope that these and other issues will be now taken into consideration so that any reduction in standards will not occur. Please share our thoughts with all concerned, and keep our letter as part of your records. We thank you for your consideration.

Sincerely,

*Elaine Stansfield*

Elaine Stansfield  
Associate Director  
ES/lm

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FEB 3 1986

Acknowledged by card.....

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