



## Mothers for Peace

1760 Alisal Avenue  
San Luis Obispo, CA 93401

February 7, 1986

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Docketing and Service Branch

Re: Diablo Canyon License Amendment to Rerack Spent  
Fuel Pools

Dear Sir:

The San Luis Obispo Mothers for Peace hereby request a hearing and petition for leave to intervene in the consideration of issuance of amendments to Diablo Canyon's (Docket Nos. 50-275 and 50-323) operating licenses DPR-80 and DPR-82. These amendments would authorize reracking of the spent fuel pools. If granted, we feel that the consequences would pose significant hazards to those of us living near Diablo Canyon.

The following information is provided as required by 10 CFR §2.714: Members of the San Luis Obispo Mothers for Peace are residents, property owners and taxpayers living in San Luis Obispo County. Some of our members have been residents of the community for generations. In 1973, the Mothers for Peace became intervenors in the operating license proceedings before the NRC, and continued to be active participants throughout those proceedings. A suit filed on our behalf before the Court of Appeals, in the D.C. Circuit, pertaining to Diablo Canyon, was heard in October of 1985, and a decision is still pending. We feel that the reracking of the spent fuel pools pose a threat to the health and safety of our families, our neighbors and our community.

In 1973, construction on Diablo Canyon's Unit 1 and 2 were almost completed when the existence of a major earthquake fault was acknowledged to be in close proximity of the reactors. Thereafter, new seismic studies, and new

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untested methods were used to justify the licensing of Diablo Canyon. The "tau effect", an untested and unexplained theory (one never fully understood by members of the Advisory Committee on Reactor Safeguards, nor by some members of the Commission) was accepted by the NRC as an important factor in reducing the effects of an earthquake on Diablo Canyon. In comparison to our knowledge of other natural hazards, the scientific study of earthquakes and volcanos remains in its infancy. The state-of-the-art improves, but the scientific prediction of earthquakes is non-existent. It is generally recognized, however, that the State of California is prone to earthquakes; it is also recognized that the Hosgri Fault lies within 3 miles of the Diablo Canyon site.

Recently, new earthquake data was presented to the NRC and as a condition of licensing, the NRC directed Pacific Gas and Electric Company to conduct a long term seismic program. The results of PG&E's study are to be submitted to the NRC in 1986. Without a complete seismic record, it is not only reckless to allow reracking of the spent fuel pools, but in addition, it would show a great disregard for the health and safety of the people of this county. By creating more storage capacity, the radioactive inventory will be greatly increased and would therefore present a significant hazard to our community in the event of an accident caused by an earthquake. Without a complete seismic record, the margin of safety could be seriously jeopardized, and thus reracking would again pose a significant hazard.

For the above reasons, we request that the NRC rule that there are significant hazards involved in the reracking of the spent fuel pools, and we request that a hearing be held on the matter.

Sincerely,

*Sandra A. Silver*

Sandra A. Silver  
San Luis Obispo Mothers for Peace

cc: Philip A. Crane  
Richard F. Locke  
Bruce Norton