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Frances Lamberts, 113 Ridge Lane, Jonesborough, TN 37659-5800  
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Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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OFFICE OF THE SECRETARY  
RULEMAKING AND  
ADJUDICATION

Dear Secretary:

I have had concerns about nuclear power-plant safety for a long time, as the enclosed letter in a local newspaper indicates. Believing as I do, that energy generation from renewable sources has many advantages over energy from other sources, I nonetheless realize that nuclear generation does and will play a part in our energy system. Strengthening safety-enhancing measures at nuclear plants is an important public issue which your Agency must continually evaluate and address.

I understand that you are considering issuance of two relevant rules, one pertaining to managerial staff training on employee legal protection if workers raise safety concerns, and one pertaining to enforcement of limitations on line-staff working hours.

I strongly support such regulation and urge its need in light of both past safety failures at plants and of likelihood of economic/competitive pressures on power producers under anticipated deregulation of the electricity industry. As in many industries, these pressures may encourage work force reductions, and demands for longer hours by workers. The public-safety issue from worker fatigue under excessively long work shifts is clear.

I urge that the new regulations assure short enough shifts to prevent worker fatigue, which could impair their performance. The work shift limitation should be effective when plants are operating, as well as when shut down for safety testing and equipment repair. During the latter tasks and times it would seem especially important that worker alertness and physical ability for maximally effective work be safeguarded.

It is of vital importance to the public that any on-line workers who note and report safety issues be fully protected from intimidation or other, untoward pressures or consequences. Requirement of training for managerial staff on the relevant legal issues and responsibilities should be included in the new regulation. Such training should be as commonplace as workforce training on discriminatory practices. In public or industrial work settings, ignorance of the legal foundations in such areas does not protect employees from consequences of illegal acts. Neither should it in the nuclear industry.

Thank you for considering my comments. In hope of strong new regulations to enhance public confidence in nuclear power-plant safety,

Sincerely,

*Frances Lamberts*

Enclosure

PDR PRM 30-62

Writer: 'Nuclear Energy Not Safe, Not The Answer'

Nov 16, 90

Dear Sir:

A recent editorial in an area newspaper suggested that the U.S. should expand its nuclear energy program. From NIH research results which show that persons living near reactors are not at increased cancer risk from radiation, the editorial seemed to conclude that nuclear energy is safe and could be a viable alternative to fossil fuels.

The nuclear industry is beset with many safety-related problems in the operation of current plants, not to speak of the 40-year-old problem of radioactive waste disposal: The Nuclear Regulatory Commission found it necessary, in 1985, to establish a commission to research surfacing "plant aging" problems of unanticipated magnitude. Premature equipment deterioration has repeatedly resulted in accidents such as at the Surry Power plant near Newport News, Va.

There in 1986, a pipe designed for 40 years of use and carrying water heated to 350 degrees had corroded to less than 1/16th of an inch (within 13 years). Its bursting released 30,000 gallons of the water, critically burning eight workers, four of whom died. The costs of the repair and replacement power were close to \$40 million.

The NRC grants power plants a standard operating license of 40 years. Yet more than one in 10 of the commercial nuclear power plants had to be closed with 20 years of licensing, and more than half of those closed were in operation less than 10 years.

The pipes, pumps, valves, generators and electric motors in the back-up, safety and emergency failure-monitoring systems are all subject to such deterioration as caused the Surry accident. Add failures of human performance to

equipment failures, then Three mile Island near-disasters, and Chernobyl-type catastrophes do not support so sanguine a view of nuclear energy safety.

The enormous human costs of the Chernobyl accident were highlighted in a recent CBS "Sixty Minutes" report. It stated that an area comparable to the state of Iowa is contaminated forever. Tens of thousands of persons continue to have to undergo regular medical checks for radiation effects. Nearly 100,000 persons have been evacuated from contaminated areas, and within the next five years, 200,000 more are to be moved. In Byelorussia, more than two million people need to be relocated, leaving behind their homes, farms, factories, and communities.

Economic costs of this disaster are equally staggering. As reported in the November 1990 issue of "World Watch," official Soviet government figures for the cleanup so far are \$19 billion. Cleanup costs are to reach \$120 billion by the year 2000.

A study by the government's R&D Institute of Power Engineering found that the accident's total costs will reach \$358 billion, comparable to 15 percent of the Soviet GNP in 1987. It concluded that "the Soviet economy would be better off if nuclear reactors had never been built."

It is clear that we must search diligently and urgently for energy solutions. But expansion of nuclear energy should not be among the preferred options.

Frances Lamberts  
Route 11  
Jonesborough