

From: Diane Jackson, *DJA*
To: Jocelyn Mitchell, William Huffman
Date: Thu, Aug 3, 2000 1:32 PM
Subject: Comment on relocation from SFP accident

Jocelyn and Bill -

Thank you for your input. I have revised the response to Orange County's comment based on your inputs. Attached is the response. Please let me know if additional changes are necessary or would improve our response.

Thanks again,
Diane

CC: GTH

4/24/02

SPLB Public Comment #14:

"The Draft Study completely sidesteps the question of where all the people who are relocated will be able to go for the decades that must pass while the land where they live recovers from radioactive contamination. This issue is graphically illustrated by the consequences of the Chernobyl accident, which rendered huge land areas uninhabitable and unsuitable for agriculture for an extended period of time."

"Finally, the Draft Study fails entirely to address the social and economic implications of losing the use of thousands of square kilometers of land for several generations."

Response:

The staff agrees with the commenter that the study did not address the topics of relocation and societal impacts, such as land interdiction. The calculations in support of this risk study were performed following the principles and approach of Regulatory Guide (RG) 1.174, "An Approach For Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," which does not include environmental considerations. While overall societal risk is not considered directly in RG 1.174, a large early release fraction (LERF) is used to gage the severity of the event outside of the plant boundary. Because RG 1.174 is applied to full power operation, the definition of LERF is not applicable to spent fuel pool accidents. Therefore, in this study, early fatalities were directly calculated and reported.

The Commission recently considered whether an additional agency safety goal or objective was needed to directly address land contamination and overall societal risk. It was decided by the Commission that the current policy would not change. For further discussion, read SECY-00-0077, dated March 30, 2000, and staff requirements memorandum dated June 27, 2000. Consistent with Commission guidance, the staff does not plan to include this issue in the study.

The accidents evaluated in this study are bounded by operating plant severe accidents and the same issues raised by this question are assessed in the initial licensing of the plant. Decommissioning does not change the impact of severe accidents on the land surrounding a nuclear power plant. As part of its original licensing review, every operating plant had an environmental impact statement that addressed land use for the area surrounding that plant. When a plant enters decommissioning, an environmental assessment is performed to determine whether activities will remain bounded by that environmental impact statement.