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PDR
September 28, 1979

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From: Robert B. Minogue

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NUREG Report NUREG-0625 _____
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Subject: REPORT OF THE SITING POLICY TASK FORCE
(NUREG-0625)

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 12 1979

MEMORANDUM FOR: Chairman Hendrie
Commissioner Gilinsky
Commissioner Kennedy
Commissioner Bradford
Commissioner Ahearne

THRU: Lee V. Gossick, Executive Director for Operations *RS for LYG*

FROM: Robert B. Minogue, Director
Office of Standards Development

SUBJECT: REPORT OF THE SITING POLICY TASK FORCE (NUREG-0625)

Both of my prior memoranda commenting on the subject report which were furnished to the Commission were written against a tight deadline. As a result they are somewhat diffuse and the key points are not very explicit. Last week on September 5, 1979, the Commission discussed this important Task Force report and further Commission discussions are planned. Before the Commission meeting I boiled down my key reactions to the Task Force report in the form of notes. Since these notes make the important points clearer than my memoranda, I thought it would be useful to the Commission to provide them a copy of my notes. It is attached. The reference to consideration of demographic issues for current sites in item 3 refers, of course, primarily to those sites that substantially exceed the present demographic criteria stated in Regulatory Guide 4.7.

Robert B. Minogue
Robert B. Minogue, Director
Office of Standards Development

Attachment:
Notes

cc: Office of the Secretary
Office of Policy Evaluation
Office of the General Counsel
Harold Denton, NRR
Edson G. Case, NRR

Contact: Robert B. Minogue
443-5936

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NOTES FOR COMMISSION MEETING 9/5/79

1. The principal assignment of the Task Force was to identify the major siting issues and lay out approaches to resolve them in a manner which would provide a basis for further in-depth assessment. Its report fulfills that assignment.
2. I agree with the Task Force's conclusion regarding Part 100's trade off between design of engineering safety features and site characteristics.
3. Another important area addressed is that of demographic factors in siting. (I use the term demographic in a very broad sense--population density and distribution, but viewed in the context of possible accident scenarios, meteorological factors, and emergency response capabilities.) The Task Force proposes to address the demographic issue in rulemaking only in a prospective way, without consideration of backfit. I think the main thrust of any rulemaking done now must be directed toward existing sites, or sites with plants under construction. New applications are highly unlikely for the foreseeable future.
4. Sound development of demographic criteria must include consideration, at least on a generic basis, of accident scenarios, including releases beyond the design basis accidents, meteorological parameters, dose calculations, and emergency response requirements. Relating to the public health risk of coal-fired stations and basing demographic limits on average population of the region so as not to eliminate the nuclear option from large regions of the country, as the Task Force suggests, does not seem to me to be a reasonable basis for rulemaking.
5. The Task Force properly stresses the importance of demographic and other siting criteria which will push toward selection of the better sites in a region. In this regard I think that any new rules formulated must differentiate between site comparisons (site suitability under NEPA review) and site acceptability (go/no go standards). The Task Force report generally does not make this distinction.
6. Fixed standoff distances for non-demographic siting factors, as proposed by the Task Force to be used as a basis for absolute decisions of acceptability, are near impossible to establish in a manner which assures adequate safety in all site situations.
7. Assessment of site acceptability and emergency planning requirements should be completely integrated. In this context, a role of site specific dose assessments is seen as guiding emergency planning, not determining the design of engineering safety features.

Robert B. Minogue

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