

EXECUTIVE OFFICE OF THE PRESIDENT
COUNCIL ON ENVIRONMENTAL QUALITY
722 JACKSON PLACE, N. W.
WASHINGTON, D. C. 20006

December 12, 1979

Richard Froelich
Division of Site Safety and
Environmental Analysis
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

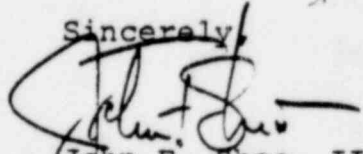
Dear Mr. Froelich:

I have reviewed your outline for environmental statements to be prepared in connection with the staff's consideration of applications to construct and operate commercial nuclear reactors. While at first glance the outline appears to conform to the format in 40 C.F.R. § 1502.10 of the Council's new regulations implementing the National Environmental Policy Act, it does not provide for the consideration of conservation as an alternative to a licensing proposal.

Section 3 of your outline concerning alternatives provides for the analysis of alternative sites (3.3.3), generating systems (3.3.2) and the "no action" alternative (3.3.1). However, conservation, which must be carefully assessed in every environmental impact statement on a proposed energy project, is not embraced by any of these categories. Subject to correction of this deficiency, the proposed outline could be used by staff as a guide in the preparation of their statements.

Should you need any further assistance on the application of NEPA to NRC activities, please contact me.

Sincerely,



John F. Shea, III
Counsel

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