



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

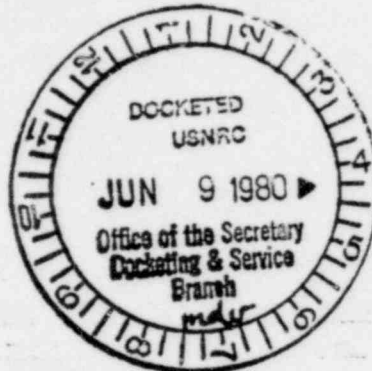
9 JUN 1980

DOCKET NUMBER
PROPOSED RULE PR-51 (7)
(45 FR 24168)

Secretary of the Commission
U.S. Nuclear Regulatory Commission
1717 H St., N.W., Room 1135
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Mr. Secretary:



OFFICE OF THE
ADMINISTRATOR

The U.S. Environmental Protection Agency (EPA) has reviewed the proposed rule, "Licensing and Regulatory Policy and Procedures for Environmental Protection; Alternative Site Reviews," as published by the NRC in the Federal Register on April 9, 1980 (45 F.R. 24168). In accordance with the Clean Air Act, Section 309, EPA provides the following comments on the proposed rule.

The overriding consideration in siting nuclear power plants is public safety. Serious reactor accidents could be caused by locating a reactor close to a seismically active area or an incompatible land use such as an airport. The consequences of a serious reactor accident could also be greatly increased if the reactor is located close to large population centers. In our view, the proposed rule and its preamble do not adequately emphasize the great importance of reactor siting to safety. We believe the NRC should add explicit statements about the critical nature of reactor siting to public safety. In particular, we believe the NRC should be more specific in identifying "other early site review issues" which we assume includes safety issues.

In addition we suggest that the NRC include a provision for "Scoping" in its regulation. This would allow for early development and public disclosure of information on siting needs, generating capacity, cooling water requirements and radiation releases. It would provide for more effective, early public input and expertise in the selection of site alternatives as opposed to the current procedures which allow for public review at a later stage in the process.

Several opportunities are available for integrating safety factors into an alternative site review process. In view of the importance of safety considerations, it would be wise to screen sites for their safety factors prior to consideration of their environmental impact. This approach may also save time in the licensing process. However, regardless of the approach used, we believe safety issues, including emergency response capability, should be part of the review and decision making on alternative sites.

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Acknowledged by [signature] 6/9/80 mdy

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We also note that reactor siting was the subject of a recent NRC report, "Report of the Siting Policy Task Force" (NUREG0625). This Task Force recommended the establishment of minimum siting criteria for nuclear power reactors. We interpret these minimum siting criteria to be the same as the exclusionary safety standards discussed in the forward section of the proposed rule.

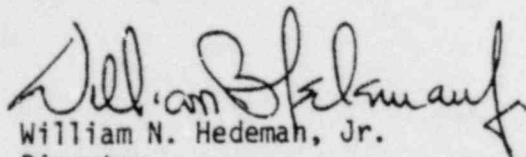
We agree that minimum siting criteria should be established for nuclear power reactors and should be implemented concurrently with the development of new criteria for the design of engineered safety systems. These criteria should stress a continued emphasis on improved design. Otherwise, we are concerned that there will be a tendency to reduce the number and efficiency of engineered safety systems in view of the potential cost savings. These criteria should be applicable to all accident scenarios from low consequence to high consequence. We also agree with the Task Force that separating reactor design from siting decisions is a step forward.

We favor the second alternative for exclusionary safety standards set forth in the preamble. In that alternative, the proposed sites would be reviewed to determine whether they exceed the minimum siting criteria.

We have no objections to the proposed rule regarding the environmental considerations for fulfilling NEPA. The proposed rule would provide a reasonable spectrum of hydrologic and physiographic areas, would minimize the environmental impact through selection of the best alternative, and would offer public participation at an early stage.

We appreciate the opportunity to comment on the proposed regulations. If you have any questions please contact Ms. Betty Jankus (202) 755-0770.

Sincerely yours,



William N. Hedeman, Jr.
Director
Office of Environmental Review (A-104)