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PROPOSED RULE

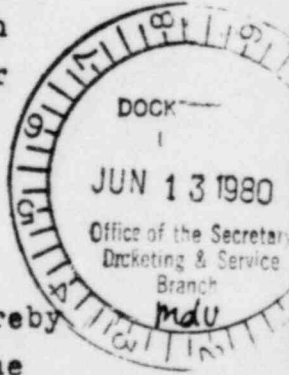
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THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

Comments on PROPOSED RULE ON REVIEW OF ALTERNATIVE SITES FOR NUCLEAR PLANTS.

According to FR Notice V45#70 April 9, 1980, comments are invited and are due on 6-9-80. I am submitting the following as my comments.

1. The Value /Impact Statement that comes along as part of the mailing when requesting this Notice is helpful in discerning some of the intricacies of this rule. It helps point up how the NRC is stacking the deck in favor of the utilities with disregard for the health and safety of the public.
2. This particular rule change has received very little media exposure except in the Federal Register. This is not the type of document that the public reads over their morning coffee. This rule change should be advertised in the way that the rule calls for: "in newspapers local to the sites identified"
I identify the sites for the advertising that this rule change needed as all the sites where early site review has been asked for, is in progress, or is likely to occur in the foreseeable future.
3. P 24169: "distances to airport" Not only is distance a consideration for nearby airports but also density of traffic, size of aircraft, placement of runways in relation to flight path going over nuke, and future expansion of nearby airports including military.
4. Emergency planning must not only be admitted to early site review but also what the emergency planning for future populations will entail. This is the question that is so disturbing at Limerick where the population has blossomed well past the 10CFR100 limits before the plants even completed.
5. IV The Proposed Rule The 6 "major issues" identified by the Staff in the first paragraph under this heading are important, but they are not most important when determining alternative sites. Add the following: (7) Increased safety (8) lessened impacts such as shortened transportation of spent fuel and dismantled reactor when it has a major accident.
6. Advertising in papers "local to the sites identified" is a good idea, but it should read "all news papers local to the sites identified." Anything else could lead to abuses such as placing an add only in the utility in house newspaper and thereby meeting the requirements of the regulation without doing what the regulation specifies. (informing the local residents.)



7. "While the applicant must describe the site selection process in an early site review, the review of specific alternative sites need not be addressed unless it is believed by the NRC that the consideration of other issues could prejudice the full consideration of alternatives at a later date."

This sentence is gibberish. What it seems to be saying, "If something looks embarrassing, you don't have to look at it in an ESR if the NRC goes along with you." This is just another means for an applicant to keep a poor site alive and in contention when it should be knocked out in an ESR.

8. D4 Rationale and discussion Why are only four sites required in this ESR for alternatives? Surely all sites of reasonable criteria in the service area must be identified.

9. "time limits for proposing additional sites." These time limits must also apply to the applicant. If his original site proves unacceptable, he should not be guaranteed the acceptability of another site merely because the other site was not rejected in a long forgotten "Review for Alternative Sites." This Alternative Site Review must not be turned into some sort of "site banking" regulation. (Underlined for emphasis.)

10. F.1.c. "If two sites" . . . This is an obvious ploy to produce 'site banking' and also to dilute public opposition. This would cause two communities to point to one another and say, "Don't put the nuke in our backyard. Do it to them."

This is right out of "1984". The hero has a ~~choice~~ choice. Big Brother will torture him or his sweetheart. The hero tells Big Brother to torture his sweetheart. The idea of two competing sites is a joy to the utility. Each community will attempt to force the nuke out of their community instead of fighting the real enemy: The deaths and cancers which will emanate from that nuke no matter where it is placed.

F. 11. F.4. "Since such investments will have been made by the applicant in good faith." This is a poor assumption. Veepco made investments in a poor site and hid the geologists reports for which it was fined by NRC. Further, Licensee Event Reports show bad faith as well as bad workmanship on the part of applicants frequently. "Mind set" referred to by the Rogovin and Kemeny reports both show that 'good faith' may not be achievable by people with vested interests such as the utility applicant.

I can't show all the errors in this regulation. How about just scrapping it.

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