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POWER FACILITY EVALUATION COUNCIL

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June 11, 1980

DOCKET NUMBER
PROPOSED RULE PR-51 (23)
(45 FR 24168)

Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D.C. 20555

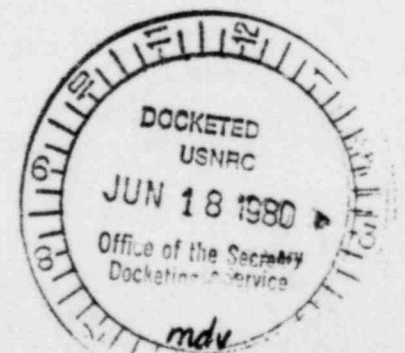
Re: Amendments to 10CFR51, 10CFR2, 10CFR50

Dear Secretary:

Regarding the notice of proposed rulemaking by the Nuclear Regulatory Commission published in the Federal Register April 9, 1980, we have the following comments for your consideration.

As the Nuclear Regulatory Commission has correctly recognized, the public controversy over the question of alternative sites is necessary, but should be focused on the critical siting issues. These, of course, must include the questions of need, economy, and the choice of technology, as considered in several parts of the Nuclear Regulatory Commission's review of alternatives. Several of these considerations are interrelated with the proposed rules concerning alternative sites, and codification should help to uncomplicate this part of the Nuclear Regulatory Commission review, while offering potential economic and environmental benefits to all parties.

Concerning the Nuclear Regulatory Commission's specific request for input on safety issues, it would appear that the six sections of the proposed rule lend themselves to, and indeed should require, careful evaluation of and public input to the safety issues of the site selection process. The second alternative of exclusionary safety standards, with the inclusion of safety issues in the alternative site consideration, is the preferable mode for this rulemaking. These standards will allow flexibility in candidate site proposal as well as a more thorough review of the critical environmental issues.



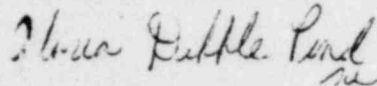
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Secretary of the Commission
June 11, 1980

As the Nuclear Regulatory Commission is aware, early public and regulatory involvement in the siting process is likely to result in more satisfactory conclusions to such proceedings, and I support the actions that the Nuclear Regulatory Commission is proposing in this regard.

Yours very truly,

A handwritten signature in cursive script that reads "Gloria Dibble Pond". The signature is written in dark ink and is positioned above the typed name.

Gloria Dibble Pond
Chairperson

GDP:CSW:eed