

EXECUTIVE OFFICE OF THE PRESIDENT
COUNCIL ON ENVIRONMENTAL QUALITY
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March 25, 1980

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Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

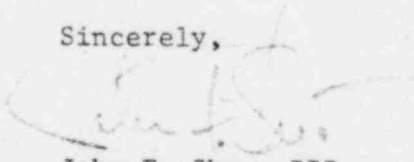
Attn: Docketing and Service Branch

Dear Secretary Chilk:

As you know, the Council recently submitted a report to the Commission entitled "NRC's Environmental Analysis of Nuclear Accidents: Is it Adequate?" and a letter from Chairman Speth to Chairman Ahearne dated March 20, 1980, concerning the Commission's analysis of nuclear accidents under the National Environmental Policy Act. I submit the enclosed copies of the letter and report for consideration as a Council comment on the Commission's proposed regulations for the implementation of NEPA published on March 3, 1980 (45 Fed. Reg. 13739).

Thank you for your cooperation.

Sincerely,


John F. Shea, III
Counsel

Enclosures



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722 JACKSON PLACE N W
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March 20, 1980

The Honorable John Ahearne
Chairman
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Ahearne:

Section 204(3) of the National Environmental Policy Act (NEPA) directs the Council on Environmental Quality "to review and appraise the various programs and activities of the Federal Government . . . for the purpose of determining the extent to which such programs and activities are contributing to the achievement of the policy [of NEPA]" Last year, as part of the Council's overall effort to meet this responsibility, the Council initiated a study of the Nuclear Regulatory Commission's regulations and policy on the environmental analysis of possible nuclear accidents under NEPA. This letter contains the conclusions of our study. We were assisted in this review by the Environmental Law Institute, which has prepared for us a report entitled "NRC's Environmental Analysis of Nuclear Accidents: Is It Adequate?", which I am providing to the Commission with this letter. The Council believes the report constitutes an accurate and important assessment of the NRC's regulations and policy on the analysis of nuclear accidents in environmental impact statements.

The results of our review of impact statements prepared by the NRC for nuclear power reactors are very disturbing. The discussion in these statements of potential accidents and their environmental impacts was found to be largely perfunctory, remarkably standardized, and uninformative to the public. Despite the broad diversity of size, design, and location of the nuclear reactors licensed by the Commission over the years, virtually every EIS contains essentially identical, "boilerplate" language written in an unvarying format. The typical EIS does not consider or analyze the possibility of a major accident even though it is these "Class 9" accidents which have the potential for greatest environmental harm and which have led to the greatest public concern. Moreover, for those accidents which are typically discussed in an EIS, the potential impacts on human health and the environment are presented in a cursory and inadequate manner with little attention to public understanding.

Each EIS relies on the NRC accident analysis policy, which has remained essentially unchanged and in interim form since 1971, asserting that "correct manufacture, design, operation and quality assurance" will provide "a high degree of protection" against the occ
limited range of accidents with vary
of materials released from such accid
provided. However, based on the cond
serious accidents will occur, the pol
severe accidents, the Class 9 events.

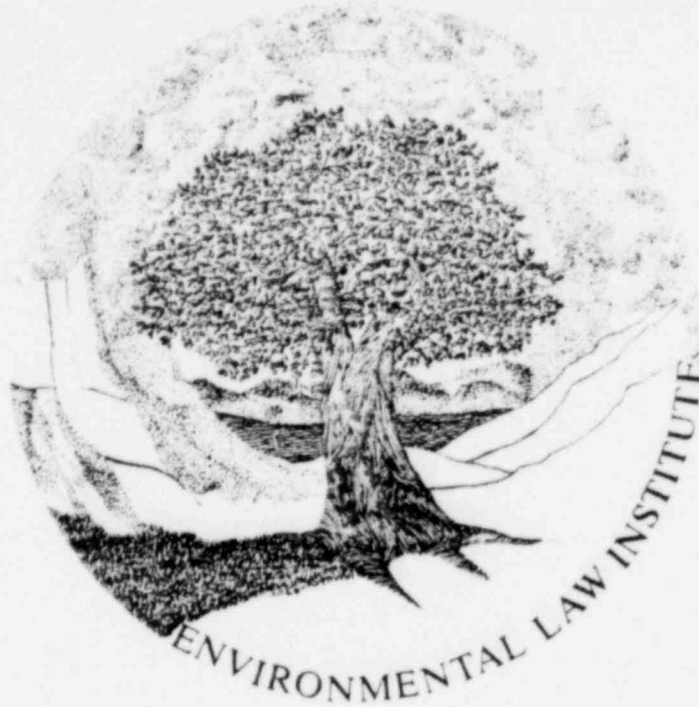
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NRC's Environmental Analysis
of Nuclear Accidents:
Is It Adequate?

February 4, 1980

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