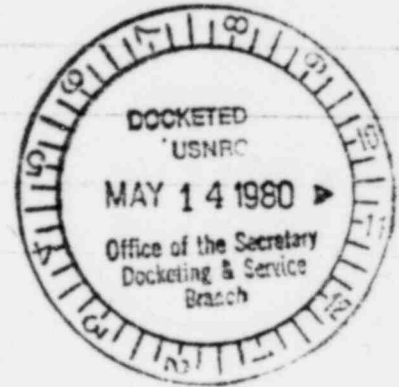


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Huntington Beach, CA 92646  
5/8/80

Secretary of the Commission  
USNRC  
Wash D.C. 20555



Dear sir,

In response to the request for comments on Alternative Site Reviews published in the Federal Register on 4/9/80, I would like to offer the following comments:

1. Selection of site alternatives should be based on characteristics which differentiate one site from another, not on characteristics which differentiate one designed facility from another. For example, geology and seismology would fall into the first category while chemical and radioactive discharge effects would fall into the second category.

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2. Category 2 characteristics can be controlled to the extent that modifications to the design of the facility can be made to reduce the environmental impact from potentially unacceptable values to potentially acceptable values as defined by federal, state and local statutes.

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3. Safety characteristics for a nuclear power plant are based almost entirely on postulated accidents which involve potential release of radioactive materials to the environment and the consequences of this release. Safety characteristics should not be made part of the site alternative selection process for the following reasons:

a. Control of radioactive releases under postulated accidents is facility related, not site related. The quantity of radioactive materials released is most definitely dependent on the design capabilities for each specific facility and not on the differences between sites.

b. The term "safety characteristics" implies both the initial conditions and the final result. For example, a low seismic site with low seismic design values produces a final result comparable to a high seismic site with high seismic design values. (In fact, the latter site may actually be safer because design assumptions for each are based on a high frequency of earthquakes, whereas, in reality, the facility may never experience a single earthquake. In this case, the facility using high seismic design values would be safer. Does this mean high seismic sites are preferable over low seismic sites?)

c. Only those characteristics which differentiate one site from another should be made part of the site alternative selection process. Since "safety" comprises both site and facility factors, it should be broken down into its site and facility components. Each site component could then be analyzed for its relative merit.

d. The safety aspect related to the release of radioactive materials to the environment is definitely not a part of the site alternative selection process simply because it is not a site characteristic. If there exists a need to distinguish between two or more sites in terms of environmental impact to the population, then standards or regulations should be developed to accomplish this. For example, an amendment to 10 CFR 100.11 establishing, in addition to an already existing site boundary individual dose limit, a total population dose (man-rem) limit, would provide ample incentive to site in remote areas.

4. The concept of man-rem limits for normal releases of radioactive materials to the environment, amended into 10 CFR 50, Appendix I, would provide additional incentive to site in remote areas.

5. In summary, points 3d and 4 effectively remove environmental impact from release of radioactive materials from the site alternative selection process and places it into law where it belongs.

Yours truly,

James J. Drasler