

DOCKET NUMBER  
PROPOSED RULE

ES 003-3

22

PR 50,51,100  
(45 FR 50350)

THE FEDERATION OF ELECTRIC POWER COMPANIES

KEIDANREN KAIKAN  
1-9-4, OTE-MACHI, CHIYODA-KU,  
TOKYO, JAPAN

September 16, 1980

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
U.S.A.

Attention: Docketing and Service Branch



Dear Sir,

Representing the electric power companies of Japan, the undersigned hereby submits for your attention our comments on the Proposed Revision of Reactor Siting Criteria explained in the Commission's advance notice.

We have the greatest interest in this issue and your utmost consideration for our opinion would be greatly appreciated.

Very truly yours,

*Toshio Ito*

Toshio Ito  
Chairman  
Nuclear Power Development Council,  
The Federation of Electric  
Power Companies of Japan

Acknowledged by card... 9/23/80

8010220 483

COMMENT ON THE PROPOSED REVISION  
OF REACTOR SITING CRITERIA

presented to

THE U.S. NUCLEAR REGULATORY COMMISSION

September 16, 1980

THE FEDERATION OF ELECTRIC POWER COMPANIES

Tokyo, Japan

Subject: Comment on the Proposed Revision  
of Reactor Siting Criteria

In determining the propriety of siting conditions of a nuclear power plant, it was believed in the early days of nuclear power generation that the exclusion distance should be set in relation to the output capacity of the nuclear power plant. Later, however, as the reliability of engineered safety features of reactors increased, it became universal to determine the site of a nuclear power plant in relation to the reactor design and engineered safety features. Today, this method is adopted throughout the world.

The revised reactor siting criteria proposed by the U.S. Nuclear Regulatory Commission, however, specify uniform numerical values for the surrounding conditions of a nuclear power plant, such as the exclusion distance and surrounding population density, regardless of the credibility of the reactor design and engineered safety features. The U.S. Nuclear Regulatory Commission's move, therefore, runs counter to the world trend explained above. Also, it seems that the U.S. Nuclear Regulatory Commission is trying to determine the numerical values of the exclusion distance and surrounding population density by taking into consideration the circumstances prevailing only in the United States without giving attention to the situation of Japan and European

countries where the population density is high.

Should the U.S., which is the pioneer in the development of light water reactors, adopt new siting criteria based on its concept stated above, such siting criteria would have a serious impact on many countries. For Japan and European countries, especially for those countries like Japan which are using American-type reactors, it would become extremely difficult to find sites for nuclear power plants. This will greatly slow down the worldwide development of nuclear power on which a great expectation is placed as the main source of alternative energy to make the world less dependent on petroleum. Eventually, the world's energy policy of reducing dependence on petroleum would fail.

We request that the Commission reconsider the proposed revision of the reactor siting criteria by fully taking into consideration the following points.

(1) Considering the fact that the U.S. is the pioneer in the development of light water reactors and hence its criteria will inevitably have a serious impact on other countries, it is desired that the U.S. Nuclear Regulatory Commission's new criteria be acceptable to Japan and European countries as well.

(2) Today, as the reliability of engineered safety

features is established, the siting conditions of nuclear power plants should be determined in relation to the reactor design and engineered safety features. We cannot agree to the Commission's proposal to define the siting conditions, regardless of the credibility of the reactor design and engineered safety features.

(3) Although the revision pertains to criteria to be applied only in the U.S., the new reactor siting criteria of the U.S. Nuclear Regulatory Commission, if established by merely taking into account the U.S. circumstances, will unavoidably have far-reaching effects on other countries, where public acceptance of the siting of nuclear power plants would become difficult, thus obstructing the further development of nuclear power. The U.S. Nuclear Regulatory Commission, therefore, should take into full consideration the circumstances prevailing in other countries as well.

(4) Emergency planning is a measure to minimize radiation exposure of the public in case of an accident and is designed to protect and safeguard the public from a standpoint different from that of siting criteria. Therefore, we cannot support the concept which directly correlates the two.

The emergency planning distance, moreover, should be determined from the standpoint of the reactor design and engineered safety features and of meteorological,

geographical, social and other conditions of the surrounding area. Therefore, a definite figure should not be applied for the emergency planning distance.

We hereby request that the U.S. Nuclear Regulatory Commission give the utmost consideration to our comments, by paying attention to the acute situation of Japan which has few energy resources and no alternative but to depend on nuclear energy.