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Docketing and Service Branch  
Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington D.C. 20555

DOCKET NUMBER PR 50,51,100<sup>(3)</sup>  
PROPOSED RULE (45 FR 50350)

Dear Sir:

I have read the NRC's document that considers the modification of the siting policy, and I am pleased to note the reconsideration that is underway.

One aspect of the reconsideration concerns me because it is not mentioned. How will future population be projected to guarantee the proper implementation of remote siting principles? The question arises from making population projections for Public Service Electric and Gas Company of New Jersey some seven years ago for the proposed Newbold Island plant. Subsequent research has indicated an absence of standard procedures for making projections. Each company or agency does what it considers to be best. Different methods yield different results, especially when the projection period is more than a decade.

I suggest that you must address the issue of standardizing projection procedures to the extent that every applicant uses the same method to produce a baseline set of projections. Furthermore, I believe you need different methods, one for the entire 50 mile area and one for the inner 5 miles.

In the absence of standardized methods, how can you be sure that the site isolation and engineering safeguard principles can be actually implemented? If anyone is interested, I can set forth some suggestions for appropriate methods.

Respectfully,  
  
Michael R. Greenberg  
Professor

Acknowledged by card: 8/22/80

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