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Secretary to the Commission
US Nuclear Regulatory Commission
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Gentlemen:

I would like to comment on a few issues recently mentioned in the Federal Register. First, the issue of permitting specific plant design features to compensate for unfavorable site characteristics. There comes a point when dealing with safety that a given situation, where added "safety precautions" increase as opposed to decrease the degree of risks. By making site approval independent of plant design considerations you are, in effect, making nuclear reactors needlessly less safe.

Another issue of interest is the consideration of plant sites based on the risks of alternative energy sources. Without question nuclear energy is safer than any other present source of power. YES! Risks from other energy sources must be considered in plant site consideration criteria.

Probably the most absurd issue under consideration is whether or not site acceptability criteria should be nationally

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uniform or regionally varying. Both instances assume that reactor sites are alike and should be considered in mass groupings. Every reactor site is unique and should be considered accordingly. You can no easier consider reactor sites than you can fairly tax two different citizens.

Sincerely

Niels K. Kistrup

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