ES 003-3

PROPOSED RULE TI

852 So. 35th Av. Omaha. NE 68105 September 3, 1980

45 FR 50350 Secretary of the NRC Nuclear Regulatory Commission Washington, D.C. 20555

Attn: Docketing and Service Branch

Dear Sirs.

In regard your proposed changes to 10CFR50, 51 and 100 with respect to reactor site isolation: First, I personally believe that the current restrictions are quite stringient enough, and if anything, should be relaxed.

Second, on the specific questions:

1. The current plant-specific design policy which allows a plant design to compensate for unfavorable site characteristics should be continued.

Take the Midland Michigan reactors for example, Certainly these are in the midst of a normal small midwestern town, but the advantabes in supplying process heat to DOW while generating electricity can eventually finance certain "exceptional" plant design features which maybe include to compensate for the exceptionally close proximity to a "civilian" population. (Yes, I know that DOW has pulled out, but eventually I predict they will by steam from Cons. Power.)

- 2. If the"risks" from other energy sources could be considered objectively, and non-politically, fine --- then Nuclear plants would be given a boost. Site acceptance criterion should be Nationally uniform. We cannot afford to have energy leaches such as California and Maine not pulling their share.
- 3. Should a uniform "minimum exclusion distance" be established? Yes, if reasonalbe. Personal experience wise, I'd vote for about one mile from sparse population, and five from dense population. Not more stringient.
- 4. The NRC should be given as little "legislative authority" as posible. That is not your job! We elect people to those jobs! The NRC should be concerned with only regulating the Nuclear community, not the whole of society. Once a plant has been sited, then it is up to the people who move next to it whether they want to take the "risk" of living next to a plant. As far as "other hazardous facilities", the plant boundry should be enough to prevent any problems with any other convential facilities.

Acknowledged by card. 9/9/10. Cell. Mark Hugo
Chem. Eng., Metallurgical Eng., M.S. Mech. Eng., Nuclear Specialty