

ES 003-3



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August 21, 1980

DOCKET NUMBER PR 50, 51, 100 (4)
PROPOSED RULE 10 CFR 50350

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

Attention: Docketing and Service Branch

Dear Sirs:

The following comments are offered to the proposed changes to 10CFR 50, 51 and 100 regarding reactor siting policies.

It is my opinion that plant specific design features will always be a function of site characteristics such as topography, geology, availability of cooling water and population density. No matter how much effort is expended in standardization, individual SAR's will always have to be written and approved with consideration given to these differences.

Furthermore, it is necessary that siting acceptability criteria reflect the consideration of the region's need for the plant, balanced against the availability of suitable sites. In Europe, this philosophy has been carried to the extent that some very densely populated regions have commercial nuclear power facilities. These plants are often equipped with special design features such as a tertiary containment wall, partial or even total underground installation, use of concrete bunkers to withstand airplane crashes, etc.

The TMI-2 accident has demonstrated that even present-design plants can adequately contain a major accident and protect the public from serious exposure and health hazard. We certainly do not need sweeping changes in siting criteria which have the

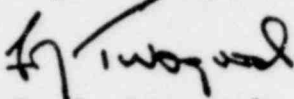
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effect of limiting or precluding the nuclear option in any region of the U. S. On the contrary, we must expand our knowledge and improve our technology, such that more and more siting flexibility is obtained.

Regretfully,

A handwritten signature in dark ink, appearing to read "F. J. Twogood". The signature is written in a cursive style with a large initial "F".

F. J. Twogood, P. E.

FJT/jw