

ES 003-3

**HARZA** ENGINEERING COMPANY CONSULTING ENGINEERS

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

Attention: Docketing and Service Branch

Gentlemen:

We have reviewed the Report of the Siting Policy Task Force, NUREG-0625, dated August 1979. We appreciate the opportunity to offer our comments, which are as follows:

Recommendation 1

1. We do not believe a fixed distance for the emergency planning distance should be specified in the regulations. The regulations should recognize that factors such as topography, demography, transportation facilities, meteorology and jurisdictional boundaries should all influence the size, and perhaps shape, of the emergency planning distance.

Item A - Additional Questions Relative to Item A

We believe that the present policy of permitting plantspecific design features to compensate for unfavorable site characteristics should be continued provided such design features have been tested and have a high probability mitigating the unfavorable site characteristics. To require that site approval be independent of plant design considerations precludes the application of engineering knowledge and advancing technology. Nor should site acceptability be nationally uniform.

L-4-10750

ACKNOWLEDGED BY CARD. 9/29/80

Recommendation 2

Minimum standoff distance is not the most appropriate criteria upon which to judge whether a nuclear power plant should be built near a major dam. Concern about dam safety is increasing and it is becoming more common for regulatory and it is becoming more common for regulatory agencies to require that the hazard potential downstream of a dam be determined by numerical analyses. Such an evaluation would also take into account the type of dam, reservoir size, and depth. Dam break analyses take into account the meteorological, hydrologic, and topographic features of the watershed and areas downstream of the dam as well as the dam's flood discharging capability. Such analyses would document the degree of damage to which a power plant would be exposed for floods of various magnitudes. This would seem to be a more appropriate criteria than distance for judging the potential hazard posed by a nearby major dam.

Recommendation 3

Reasonable assurance that interdictive measures are possible to limit groundwater contamination resulting from Class 9 accidents can be established as part of geotechnical investigations of a proposed site. Subsurface drilling, installation of monitoring wells, and determination of regional groundwater table gradients based on data collected from such wells could serve as the basis for establishing such assurance. If the groundwater table is reasonably flat and does not significantly contribute to surface runoff near the site it would be reasonable to conclude that interdictive measures could be taken to avoid offsite transport of radioactive materials by groundwater flow.

Recommendation 6

We believe that the terminology "unique or unusual design to compensate for site inadequacies" is unnecessarily restrictive. Engineering solutions that may be unique or unusual could well compensate for unfavorable site conditions. The test of such solutions should be whether they can be expected to mitigate the unfavorable conditions based on a proven past track record.

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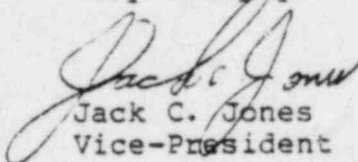
It should be recognized that the number of potential sites available to the utility is finite and should probably be defined by its service area rather state or local jurisdictional boundaries.

Recommendation 8

We believe it would not be in the best interests of the public for the NRC to terminate its review of a site in cases where the site was disapproved by a state agency, whose approval was mandatory, unless the NRC concurred with the agency on the grounds for disapproval. It is presumed that the expertise of the NRC in the siting and design of nuclear power plants is considerably greater than that of a state agency. Therefore if in the opinion of the NRC the site is viable, and if the utility chooses to pursue site obtaining site approval, the NRC should not prematurely terminate its review. We agree that the decision to terminate should be reviewed at the highest levels of the Commission after there is assurance that the site is unequivocally rejected by a state agency charged with the responsibility for power plant site approach. Such a review should result in a definite statement to the utility regarding whether the NRC intends to terminate its review so that the utility can make appropriate changes in its plans.

We endorse the Commission's effort to update its siting criteria and hope these comments will be of use to you in your future efforts.

Very truly yours,

  
Jack C. Jones  
Vice-President