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 PROPOSED RULE 45 PR 50350

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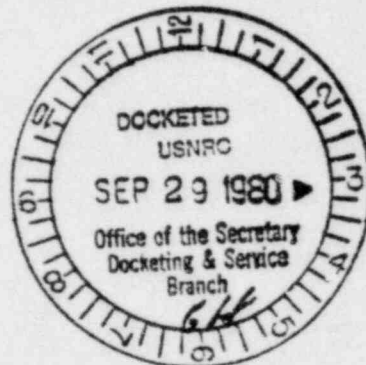
**ILLINOIS COMMISSION ON
 ATOMIC ENERGY**

LINCOLN TOWER PLAZA
 524 SOUTH SECOND STREET
 ROOM 415
 SPRINGFIELD, ILLINOIS 62706
 TELEPHONE: 217/782-5057

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September 25, 1980

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



Dear Sir:

Subject: Advance Notice of Rulemaking:
 Revision of Reactor Siting Criteria.
 Federal Register, Vol. 45, No. 147, Tuesday, July 29, 1980

The Illinois Commission on Atomic Energy (ICAE) appreciates the opportunity to provide comments concerning the above subject, and intends to participate in future rulemaking hearings. The following comments are offered at this time on behalf of the IC AE:

- (1) The US-NRC is currently considering the revision of regulatory policy through proposed rulemaking hearings concerning a number of issues including Class-9 accidents (degraded cores), Siting and Environmental Impact Statements. These issues are closely interrelated and should for that reason be addressed in a coherent and logical sequence.
- (2) Though a review, and possible revision, of the US-NRC nuclear reactor siting criteria seems appropriate, it does not appear to have great urgency since few applications for new sites have been made in recent years. In view of this absence of urgency, there does not appear to exist any valid reason not to proceed with caution and in a logical sequence.
- (3) The Advance Notice of Rulemaking on Siting invites comments on the report NUREG-0625, entitled "Report of the Siting Policy Task Force." It is recommended that the technical content of this report be substantially extended and improved by performing a set of comprehensive analyses, to be completed prior to the start of a siting rulemaking hearing. These analyses should involve, among other things, site specific calculations of accident consequences involving a number of sites with a wide spectrum of population densities and other site features that may be pertinent, a wide variation in reactor designs and power levels, variations in evacuation strategy, and the number of reactors per site.

L-4-19750

Acknowledged by card. 9/29/80

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To the Secretary of the
U.S. Nuclear Regulatory Commission

September 25, 1980

- (4) NUREG-0715 is a valuable study, containing indications of great significance in the setting of siting policy:
- a. The variation in potential LWR accident risks due to variations in population densities at U.S. reactor sites is about the same magnitude as the risk variation due to differences in reactor design.
 - b. The variation in potential accident risks at any particular site due to differences in evacuation strategy is very much smaller than that due to reactor designs or site population densities. The variation in accident risks due to differing evacuation strategies vs. no evacuation is also small and not particularly significant compared to the other variations.
 - c. The major impetus behind the concern about high population density sites appears to be related to their evacuability. Current plans about evacuation being limited to relatively short distances (10 miles as indicated in NUREG-0395) do not cast doubt on the evacuability of even the highest population sites for the U.S. Further, as stated above, evacuation will have only a relatively small effect on early fatalities; also other strategies such as sheltering (NUREG-0395) could be about as effective as evacuation.
 - d. The proposed NRC approach (NUREG-0625) of "establishing requirements for site approval that are independent of plant design consideration" appears to be questionable. A historical view of siting practices (NUREG-0348) indicates that over the past 20 years, the distances from plants to population centers have increased by about a factor of 2 and that the cumulative population within 30 miles of plants have decreased on the average by about a factor of 10.
- (5) The NRC is also considering Rulemaking Hearings on Degraded Cores that could result in changes to the engineered safety features for LWRs. If this were to happen in the near future, it could significantly affect and perhaps invalidate the siting analysis discussed under item 3. This underlines the importance of proceeding in a logical sequence, as observed under item 1.

The ICAE expresses the hope that the above comments may aid in formulating a better approach to the proposed revision of reactor siting criteria. The ICAE looks forward to future constructive interaction with the US-NRC on this and other related important issues.

Sincerely,


George Ray Hudson, Chairman
Illinois Commission on Atomic Energy
Illinois Representative, 41st District

GRH:gfs

cc: Governor James R. Thompson
Senator Charles H. Percy
Senator Adlai E. Stevenson