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H. M. HOWE  
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September 29, 1980

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

Attention: Docketing and Service Branch

Gentlemen:

We have reviewed the recommendations contained in the "Report of the Siting Policy Task Force", NUREG 0625, August, 1979. Our comments are enclosed as Attachment 1.

Yours truly,

*J.M. Zane*

*L-4-1, 19750*

Enclosure

*10/3/80*



Commentary Regarding NUREG-0625,  
Report of the Siting Policy Task Force

General Observations:

1. The overall goal of improving the safety of nuclear projects through increased site isolation appears reasonable, provided that the implementing criteria are adequately developed and that the nuclear option is not eliminated from large regions.

2. The proposed modifications have not been adequately developed. They represent the options and recommendations of a small nine man task force, and no technical back-up has been provided. Public and industry input appears to have been minimal.

3. The proposed modifications are not complete. Certain site risks have been identified (e.g., capable faults), but others have not (e.g., vulcanism, liquefaction, landslides). The result is that there is no way to know whether overall project safety will be improved.

4. The decoupling of site acceptance and engineered safety features is a major step backwards for the industry and will result in many problems:

- The cost effectiveness and overall safety of alternative plant-site combinations will be difficult or impossible to evaluate during the utility's siting process.
- The obvious safety features of certain plant designs, such as floating plants, will not be considered in determining site acceptance.

5. Some flexibility of the criteria should be maintained so that regional differences can be accommodated. This is especially important since the environmental consequences and feasibility of alternative energy sources vary regionally. This regional flexibility might best be achieved with the "three tier" approach.

6. Some measure of cumulative conservatism should be incorporated into the criteria. The recommendations for avoiding population centers, airports, faults, etc. are all mutually independent and provide no basis for determining overall site safety. For example, a site which barely meets all the criteria would seem to be acceptable, while a site which is

far better for all criteria, except one where it might barely fail, would seem to be unacceptable. Clearly, some quantification of risk and benefits is needed.

Concerning Geotechnical Issues:

1. The NRC's summary indicates that consideration of geologic and seismic criteria will be deferred for some time.

2. The recommended stand-off distance of 12.5 miles for capable faults has not been justified. (ESA will obtain and review the referenced publications.) Clearly, these criteria fail to recognize fault length and type of fault as important variables. In effect, also, it eliminates most sites west of the Rocky Mountains and certainly all sites in California with access to sea water cooling.