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

Dear Commission Members,

The following comments are submitted in response to the Advance Notice of Rulemaking: Revision of Reactor Siting Criteria. These comments are on seven of the nine recommendations contained in the "Report of the Siting Policy Task Force", NUREG-0625, August 1979. I hope they will be included for this version of the proposed rule changes. (The complete text of the report (NUREG-0625) was not used in the formulation of these comments). The comments follow the format used in the Advance Notice (Item, Alternative, etc.).

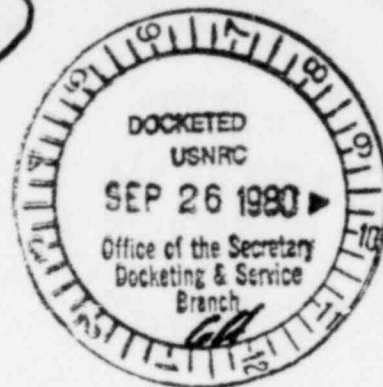
Item A (Task Force). 1. Plant design features should not attempt to compensate for unfavorable site characteristics. 2. The risk associated with accidents beyond the design basis should be taken into consideration in siting by establishing population density and distribution criteria. Plant design improvements should not be relied on to compensate for inappropriate siting. 3. Siting requirements should be stringent enough to limit the residual risk of reactor operation. If this requirement eliminates the nuclear option from large regions of the country, so be it. The decisions as to the safety of the public should be first and foremost in the minds of the Commission: economics or political factors concerning the stability of the nuclear industry should not be considered by this regulatory agency. I question the validity of the statement "risks from some energy sources (are) greater than that of the nuclear option." Each energy alternative should be examined by the region where new generating capacity is needed. These alternatives should include conservation, solar, wind, tidal, and small hydro. The alternatives could be examined on the basis of economy, but most important, they should be examined on the basis of risk to the public and to the environment which the public (society) must depend on for survival. Perhaps the Commission could play a role in focusing on the advantages (economic and no-risk) of alternatives to nuclear energy in siting procedures.

Item A (ACRS). I question the authority of the Commission to decide on "acceptable" risk to individuals and the general public. The Commission does not have the right to give the utilities license to 'play God' with individuals' lives. Over exposure to radioactivity in the case of an accident causes cancer, miscarriage, still-birth; death. It is apparent that alternative energies do not contain the risks that nuclear energy contains. In the case of nuclear energy, statistics of risk do not suggest if an accident will happen; rather statistics state that it will happen - the variable being when.

Additional Questions: 1. Site approval should be independent of plant design consideration. 2. The decision of whether a reactor should be sited in a particular area, should include consideration of the risk of alternative energy sources: if the alternative energy risk is lower, a nuclear plant should not be considered for that particular area. Concerning "acceptable risk", I do not find it acceptable to expose the public to the degree of risk that nuclear

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energy exposes the public to. The risk that I find most unacceptable is that when a nuclear accident occurs, it will completely destroy an area for thousands of years. While the chances of accident may be acceptable, the degree of the accident is not acceptable, no matter what the site location is. 3. Site acceptability criteria should include the following: a) Need for power - Are there safe/clean alternatives available? (conservation, solar, small hydro, wind, tidal). b) Population - Are there segments of the population with a higher sensitivity to radiation from normal (and unusual) releases? This would include children, pregnant women, and the elderly. c) How much background radiation is already present in the area? (high elevation, other atomic activity, latitudes, etc.). d) Is there agriculture grown in the area or livestock, including dairy, raised in the area? e) Is it near a water system used for a drinking supply? f) Is it near a water system which is used for a food supply? g) Is it near a populated area? h) Is there a plant species or animal species unique to the area that, if mutated from radioactive releases would become extinct? i) Is the proposed site on or near unstable geologic foundations (including earthquake faults, volcanos)? j) Is the proposed site in the area of radical meteorologic phenomenon such as tornadoes, tidal waves, or hurricanes?

Item B (Task Force and ACRS). 1. I agree that the specification of a minimum exclusion distance should include consideration of the risk from all accidents, not just design basis accidents. It should include consideration of the number of reactors at the site. 2. Emergency planning distance should be greater than 10 miles. A 75 mile radius would be a better minimum, with appropriate attention given to potential problems at greater distances. 3. a. There should not be an allowance for some regions of the country to employ higher maximum population densities. b. The NRC should place a substantially greater emphasis on improbable, large accidents in its siting and design requirements. c. Emergency measures, such as evacuation, sheltering, and decontamination should be underestimated in their effectiveness. d. Meteorology should be given consideration in regard to the development of siting criteria. 4. Nuclear plant safety is dependent on the following factors: (total) site isolation, flawless engineered safety features, safety related design and operational requirements, and on the effectiveness of emergency measures. Because the degree of risk is significantly increased by any flaw in any of these features, is the total risk of nuclear energy acceptable?

Additional Questions. 1. The minimum exclusion distance should be on a plant-specific basis and should include design basis accidents as well as any other possible accident situation. 3. Criteria established to limit acceptable population densities or distribution should be applied not only to the current population but also to the projected post-licensing populations projected over the expected operating lifetime of the plant. Note: this factor should limit the license; the license must not attempt to limit the population. 4,5,6. I believe the Commission, by accepting specific population density and distribution limits, is neglecting the welfare and safety of the individual for increased energy for the majority. These population density figures suggest a system of sacrifice: If the plant is not safe for all, then it is not safe for some. I do not believe that nuclear energy plants can be isolated to the point of safety for all.

Item C. I agree with Alternative A: Task Force Recommendation 2, "Revise Part 100 to require consideration of the potential hazards posed by man-made activities and natural characteristics of sites by establishing minimum standoff distances for: items 1 through 7, including items 8 through 10." The ACRS suggestion for an adequate rationale for the specific numbers suggested should be considered for each category on a case-by-case basis.

Item D. I agree with the Task Force recommendation that would require measures to limit groundwater contamination. I suggest going beyond this by preventing any groundwater contamination, and to include measures to prevent particulate fallout or rainout that could result in groundwater contamination. Item F. While these prohibitive measures are a factor in preventing increased risk to the public, they turn the utility into a dictator of the community process. I question the comment by ACRS concerning the nature and use of the land surrounding a site. By suggesting that whether it is fertile land or a desert implies a value judgement; both should be viewed as valuable, and not subjected to deterioration. Regarding additional question 3: Any activity which compromises plant safety should result in a plant shut down. The public (and other individuals) must not be subjected to any compromising in plant safety.

Item G. The recommendation by ACRS to clarify the Task Force Recommendation 6 to read "Continue the current approach relative to site selection from a safety viewpoint, but select sites so that there are no characteristics requiring unproved design to compensate for site inadequacies." sounds like a reasonable recommendation.

Item H. I believe that the Commission should remain open minded to the extent that at any point that new information is presented that pertains to the safety of a site, that information should be considered in the licensing process. Any time such information arises, the licensing process should be reopened.

Item I. A state should always have the authority to reject a proposed nuclear plant site, for whatever reason, providing sufficient basis for NRC to terminate review.

Thankyou for your consideration of these recommendations. I am glad to see that the Commission is reviewing siting criteria and trying to provide a safer climate for nuclear energy generation.

Sincerely,



Lynn Rice