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PROPOSED RULE 45 FR 50250

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December 17, 1980

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

Re: Comments on "Environmental Impact Statement for Reactor  
Siting Criteria"

Dear Sir:

With regard to issue IV.2, "Feasibility of Protective  
Actions", the new reactor siting criteria should prevent the  
future licensing of reactors at sites where:

- (1) regional transportation constraints would impede  
the expedient evacuation of persons within a 20-mile  
radius of the site (e.g., because of physical barriers  
or an insufficient transportation network);
- (2) the "population center distance" as defined in  
the current 10 CFR Part 100 is less than 20 miles.

Although current FEMA and NRC guidance call for detailed  
evacuation planning in only a 10-mile zone around the reactor,  
in the siting process a 20-mile radius must be specified as  
above to properly consider the risks from all accidents, not  
just design basis accidents.

Sincerely,  
*James O. Payne, Jr.*

Acknowledged by card... 12/29/80

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