



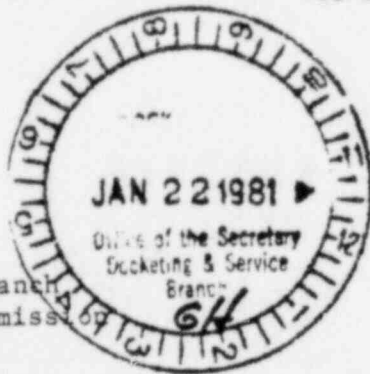
Carolina Power & Light Company

January 19, 1981

PROPOSED RULE PR 50, 51, 100
45 FR 79082

File: NG-3514(G)

Serial No.: NO-81-112



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



COMMENTS ON PROPOSED ENVIRONMENTAL IMPACT STATEMENT FOR REACTOR SITING CRITERIA

Dear Sir:

Carolina Power & Light Company (CP&L) has reviewed the Intent to Prepare an Environmental Impact Statement for Revision of the Regulations Governing the Siting of Nuclear Power Plants dated November 17, 1980 and hereby provides the comments listed below.

CP&L does not have specific comments related to the content of the proposed Environmental Impact Statement (EIS) but is concerned with the timing of the rulemaking for revising the criteria for reactor siting. Since the accident at Three Mile Island Unit No. 2, it has become evident that revised or new criteria were required in the areas of Safety Goals and Methodology, Standard Safety Features, Degraded Core Cooling, Reactor Siting and Emergency Planning. CP&L believes that not only do these areas need to be addressed by the NRC and the Nuclear Industry but that they should be addressed in the order listed above. If necessary, interim guidance could be issued in some areas, but establishment of Safety Goals and Methodology should be accomplished first with the other areas following as a natural progression once the envelope of the Safety Goal is determined. The NRC, however, seems to be proceeding in exactly the opposite direction. A new Emergency Planning Rule has already been implemented and advance notice of rulemaking has already been published in the areas of Reactor Siting and Degraded Core Cooling. The present approach being followed by the NRC appears to lack coordination and seems to ignore the interrelationships between these areas.

CP&L, therefore, recommends that the NRC reconsider the ordering and interrelationships of these items (i.e. Safety Goals and Methodology, Standard Safety Features, Degraded Core Cooling, Reactor Siting and Emergency Planning) and that maximum effort be directed toward the establishment of Safety Goals and Methodology. The revision of criteria in the other areas should then follow as a logical outgrowth of this effort.

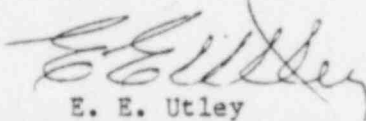
Acknowledged by *[Signature]* 1/22/81

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If you have any questions concerning these comments, please contact our staff.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

JJS/dk (N#25)