IN REPLY REFER TO



United States Department of the Interior

3500 (530)

BUREAU OF LAND MANAGEMENT WASHINGTON, D.C. 20240

> PROPOSED RULE PR 50, 51,100 45 FR 79820

JAN 29 1981,

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

Dear Sir:

The Nuclear Regulatory Commission's (NPC) Notice of Intent to Frepare an Environmental Impact Statement for Revision of the Regulations Governing the Siting of Nuclear Power Plants (designated as ER 80/1466 by the Department of the Interior) was published in the Federal Register of December 2, 1980, and requested comments on E issues to be evaluated in the EIS and on the range of alternatives for items identified in an advance notice of rulemaking regarding nuclear reactor siting published in the Federal Register of July 29, 1980

We have reviewed the proposed rules carefully, particularly the Issues listed in Appendix B, Technical Approach to Detailed Analyses. They appear to cover all the major problems meriting consideration in an EIS on nuclear reactor siting.

Most of the issues do not apply directly to the Bureau of Lance Management (BIM), except for Issue XII, Use of Federal Lands. Should the NRC decide that it would be desirable to place a nuclear reactor site in the western United States on Federal land administered by BLM and make a request of the Department of the Interior for permission to use Federal land for this purpose, the exact site or any alternate site for which permission for use is granted should be selected by the Secretary of the Interior in consultation with NRC. In this way, the Secretary could ensure that (1) the land selected would be best used as a nucleur power plant site rather than for mineral exploration or some other purpose; (2) the area would be sufficiently remote from population centers to meet the most desirable exclusion distances and population density and distribution criteria recommended in Issue I, Radiological Consequences of Accidents, and Issue V, Socioeconomic Impacts of Degrees of Remoteness; and (3) areas with potential detrimental effects on ground-water and other water resources could be eliminated by wise selection, thus fulfilling the recommendations in Issue IX, Effect of Ground-water Interdiction Criteria on Site Availability. Such secretarial control would be in line with the Department of the Interior's recommendation to the Department of Energy on the choice of sites on Federal land for radioactive waste disposal.

Thank you for the opportunity to review these proposed rules. If you have any questions, please contact us.

Sincerely yours,

Im L. white

Assistant Director