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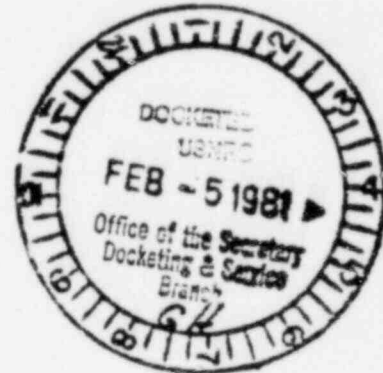
January 30, 1981  
L-81-31

Office of Nuclear Reactor Regulation  
Attention: Mr. Samuel J. Chilk  
Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

Re: Notice of Intent to Prepare  
Environmental Impact Statement  
for Reactor Siting Criteria



Florida Power & Light Company has reviewed the referenced Notice of Intent, and submits the following comments on the proposed Environmental Impact Statement:

The approaches for establishing demographic criteria should not include "regionalization" as a framework for specifying the "desired degree of remoteness" (III 1.b.2.) As elaborated on under Appendix A, "Issues Important to the Specification of Reactor Siting Criteria", item IV. 3.a and under Appendix B, "Technical Approach to Detailed Analyses", issues III (Definition of Region), IV (Site Availability) and VIII (Precluding Siting of Nuclear Reactors in any region of the United States) - none of these analytical approaches can use "regionalization" as an independent, practical basis for specifying site suitability or adequacy. Any definition of regionalization is going to contain several of the issues listed in Appendix A, IV, each of which would vary considerably within any region. Ascertaining and applying the three tier approach (ANR, Item B, Alternative B) to the above issues would meet the requirements for a real world case-by-case evaluation for site adequacy.

We thank you for the opportunity to make these comments.

Very truly yours,

*J. O. DeMurray*  
Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/LFR/ah



L-4-1, PL 50

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