

5-4, Otemachi 1-Chome, Chiyoda-ku,
Tokyo, 100 Japan

ES 003-3

CABLE JATOMFORUM TOKYO
TELEX 2226623 JAIFRM J

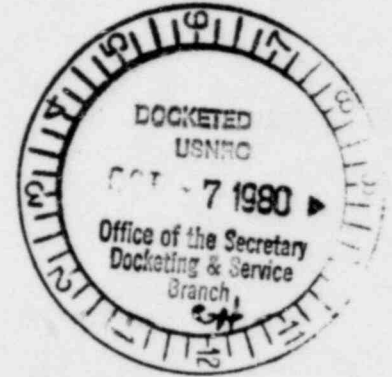
DOCUME NUMBER
PROPOSED RULE PR 50,51,100
(45 FR 50350)

54

JAPAN ATOMIC INDUSTRIAL FORUM, INC.
- NIPPON GENSHIRYOKU SANGYO KAIGI -

September 30, 1980

Secretary of the Commission
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555
U. S. A.



Attention: Docketing and Service Branch

Dear Sir,

This is to confirm the comments of the Japan Atomic Industrial Forum on the Proposed Revision of Reactor Siting Criteria, as we telexed today.

In our country who has no substantial alternative to petroleum and has to depend on nuclear energy, the nuclear industry has the greatest concern on this issue.

Your utmost consideration for our sincere opinion would be highly appreciated.

Sincerely yours,

Kazuhisa Mori
Kazuhisa Mori
Executive Managing Director

KM/mh
Enclosure: As stated above.

L-4-1 PT50

8010240 200

acknowledged by card 10/6/80

Comments on the Proposed Revision of
Reactor Siting Criteria

September 29, 1980

Japan Atomic Industrial Forum, Inc.

1. In establishing its reactor siting criteria, the Nuclear Regulatory Commission (NRC) is going against the world trend by separating the distance factor from engineered safety features and setting up independent criteria for the distance factor. We do not agree to such a course. We are deeply concerned that separating these two closely related factors and emphasizing just one of them would greatly confuse the public's understanding of the safety of nuclear power.
2. Granted that NRC is in a position where it has to establish siting criteria being apart from ESF, it is still inappropriate for NRC to submit to public hearing the proposed reactor siting criteria divorced from ESF, for the following reasons.

Under the current situation in which (1) the level of the social risk attendant to nuclear power has not yet been clarified and (2) conclusions have not yet been drawn from the study on the ESF, it is impossible to discuss scientifically the adequacy of the numerical values of the exclusion distance as well as the population density given in the NRC's proposed siting criteria.

3. By taking into account nuclear accidents up to class 9, various kinds of studies are already being conducted to define the level of social risk attendant to nuclear power. These studies are being conducted in relation to risks of other social activities, including thermal power plants. Accordingly, not much time will be needed to determine, even though it may be provisional, the level of social risks. As regards ESF, a follow-up study of the Rassmussen Study, rule-making concerning the degraded core, and the German Risk Study (Phase B) are in progress. Therefore, it is fully possible to obtain their results before discussing revision of

the reactor siting criteria.

The results of these studies could have a decisive influence on the necessity and logic of determining independent criteria for the distance factor separate from ESF as well as on the numerical values given in the proposed reactor siting criteria.

4. Although the siting criteria, in principle, is a domestic legislative problem, the NRC should be quite aware that public reaction to matters concerning the safety of nuclear power is very much international. We strongly request the NRC to exercise the utmost prudence in its handling of this matter.