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ARGONNE NATIONAL LABORATORY

9700 South Cass Avenue, Argonne, Illinois 60439

Telephone 312/972-3017

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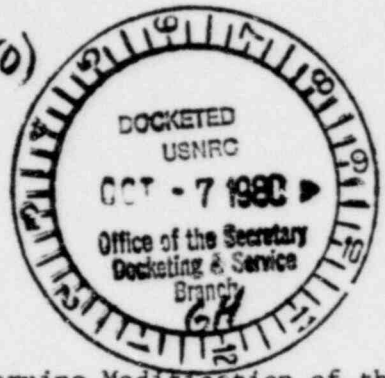

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTN: Docketing and Service Branch

Dear Mr. Secretary:

I am responding to your action concerning Modification of the Policy and Regulatory Practice Governing The Siting of Nuclear Power Reactors. I have reviewed the Supplementary Information which appeared in your July 29, 1980 News Release and have had discussion with Mr. Richard Grill of your Office of Standards Development.

Unfortunately, I am not currently in the position to comment extensively on the material in front of me, but there is one area which I wish to develop with you. My profession is as a research economist and my specialty is socioeconomics. On numerous occasions I have participated in assessments of varied energy technologies and believe that it has given me adequate exposure to the variables significant in deriving the magnitude of impact attributable to powerplant construction. In this regard, I would suggest that you incorporate into your rulemaking procedure, relative to the revision of reactor siting criteria, the evaluation of particular socioeconomic impact attributes. These could be identified at a later date by either myself or a member of your Regional Impact Analysis Section. I believe it is important to account for the economic, manpower, materials and social aspects of your powerplant siting before they are assessed in an environmental impact statement. It is valuable with regard to minimizing the adverse effects through front-end planning and optimal site selection, in contrast to the development of mitigation or management strategies after the construction has begun. I did not perceive these socioeconomic aspects nor this concept of impact minimization discussed in the news release, whereas I think that it should be an integral part of the siting criteria along with the environmental, policy and demand/supply aspects already included.

My concern for the incorporation of socioeconomic impact variables into your siting criteria originates from a study I performed which identified that powerplants (nuclear and coal) are being designed to be larger and sited in more remote locations. This conclusion was derived through an analysis of industry siting patterns/plans which were correlated with the socioeconomic characteristics of the host counties. The combination of a rural siting and a manpower-intensive construction schedule often promotes the necessity for substantial indirect and income-induced employment together with an unmanageable

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population growth rate attributable to the in-migration of the necessary workers. This is induced through the inadequacy of basic and secondary workers within commuting range of the prospective site. The importation of these necessary workers and their families could precipitate housing shortages, public and private service constraints, fiscal imbalances and other socioeconomic impacts if the growth rate exceeds an accommodable level.

The inclusion, therefore, of select socioeconomic variables or indices of impact could preclude many of the problems associated with an expansive population growth rate. A minimization of the ultimate human environment effects through their consideration in the siting criteria may moderate forthcoming manpower shortages and conflicts due to the expansive development strategies of other emerging energy technologies while accenting the positive employment and economic aspects of nuclear powerplant construction/operation.

Thank you for giving me this opportunity to comment on your nuclear reactor siting criteria revisions. If I can be of any further assistance, do not hesitate to call on me.

Respectfully,

David W. South

David W. South
Energy & Environmental Systems Division

DWS/slr