



Department of Nuclear Engineering

Ward Hall  
Manhattan, Kansas 66506  
913-532-5624



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TO: Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
ATTN: Docketing and Service Branch

FR: J.O. Mingle  
Professor

*J.O. Mingle*

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

DA: 27 September 1980

RE: Advance Notice of Rulemaking: Revision of Reactor Siting Criteria,  
45 FR 50350, July 29, 1980.

The proposed rulemaking takes an unfortunate narrow view of reactor siting criteria by limiting itself to population only. Certainly population is important, but it should be one of the factors not the only factor. The current concept of received radiation dosage includes population but also the unseparable effect of engineered safety features applied to the nuclear power plant design. Therefore, a systems approach, not a one factor population approach, is the criteria to apply to reactor siting. Certainly the ACRS discussion supports this systems approach philosophy.

Of the suggested items only Item G, alternative A, continuing the present policy, should be further considered unless Item J on common bases for risks is implemented.

This NRC approach of separating siting criteria from engineered reactor safety features and using low population zones only will lead to a de facto ban on any new nuclear power sites, since any acceptable sites from a population viewpoint will be unacceptable when economic factors of power transmission costs are applied. At best, existing nuclear sites may become nuclear parks, and an important lesson of Three Mile Island that TMI-1 is unavailable because of TMI-2 will be further ignored. Is no new nuclear power plant sites the desired NRC result?

Did not Congress make the overall policy decision in favor of nuclear power and leave only its regulation, not its prohibition, to the NRC?

Acknowledged by card... 10/1/80

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