

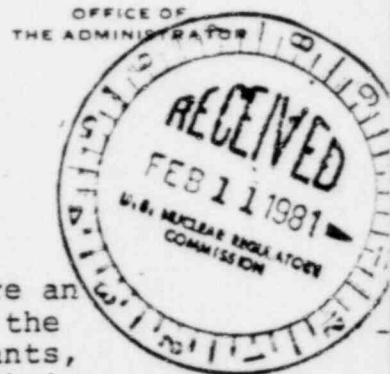


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C. 20460

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Mr. John F. Ahearne, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

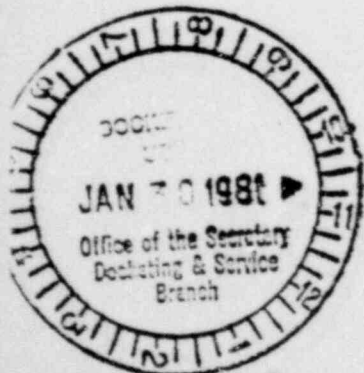
Dear Mr. Ahearne:

We have reviewed the Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for revision of the regulations governing the siting of nuclear power plants, as published by the Nuclear Regulatory Commission (NRC) in the Federal Register on December 1, 1980 (45 F.R. 79820).

EPA has previously provided comments to NRC on other related reactor siting issues. First, in a letter from Dr. R. J. Augustine to Mr. Harold Denton, dated February 4, 1980, EPA responded to a request by the NRC for comments from the Federal Interagency Central Coordinating Committee on the "Report of the Siting Policy Task Force" (NUREG-0625). Comments were also provided on the issue of alternative site reviews in a letter from me to the Secretary of the Commission, dated June 9, 1980. Those letters set forth EPA's views on safety in the siting of nuclear power plants.

Since an overriding concern in the siting of nuclear power plants is the protection of public health and safety, EPA supports NRC's intent to review the reactor siting criteria and to prepare an EIS in support of that rulemaking. We have two general comments on the Notice of Intent:

1. In your "Plan for Developing a Safety Goal" (45 F.R. 71023), NRC has identified numerous issues that are to be addressed in the development of your policy paper on safety. Some of the issues are similar to those in the NOI and the "Advanced Notice of Rulemaking: Revision of Reactor Siting Criteria" (45 F.R. 50350). It also appears that the final policy statement will have a direct bearing on the selection of alternatives for reactor siting criteria. Since the policy



Acknowledged by and... 1/30/81

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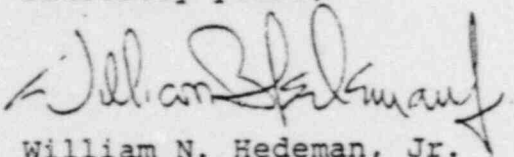
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paper and the EIS are being developed concurrently, Section V of the EIS Comparison of Alternatives; Selection of Proposed Criteria, should also discuss the compatibility of siting goals and alternatives with NRC's safety policy.

2. We note that the criteria for siting under consideration for rulemaking are only a subset of the total criteria used by NRC in siting. The total set of criteria includes a number of environmental factors, including water consumption, wastewater discharges, terrestrial and aquatic ecosystem effects, and recreational and environmental land use impacts, which were identified in your proposed rulemaking for 10 CFR Part 51 (45 F.R. 24168, April 9, 1980). In your proposed EIS, we recommend that the comparison of alternatives and the assessment of issues under consideration be studied to determine the degree to which the criteria under consideration conflict with, or impede conformance with, the environmental criteria proposed for 10 CFR 51. The EIS should also explain how the two sets of criteria will be integrated in the siting decision process.

Attached are detailed comments on the Notice of Intent, which we hope are useful to you in determining the scope of the issues to be addressed in the EIS. If you have any questions on our comments, please contact John Meagher of my staff at 755-0790.

Sincerely yours,



William N. Hedeman, Jr.
Director
Office of Environmental Review

Attachment

Detailed Comments on NRC's Notice of
Intent for an EIS on Siting for
Nuclear Power Plants

The following comments are numbered to correspond with the issues identified in the Federal Register Notice.

I. Consideration of the radiological consequences of accidents should include demographic criteria which are in accord with NUREG-0654/FEMA-REP-1.

In addition, probabilities of occurrence and consequences should be calculated for a full range of accident releases to fully evaluate the relative importance between individual and social risk. With the use of an updated version of the Reactor Safety Study Consequences Model (CRAC) computer code, it would be beneficial to include, as an appendix to the EIS, a discussion of the revisions made to the CRAC code since the Reactor Safety Study was published.

II. Feasibility studies for protective actions should include consideration of evacuation requirements for nearby institutions such as hospitals, prisons, retirement villages and religious institutions, as well as seasonal use facilities such as ski lodges or waterfront vacation areas. Notification of interim or occasional occupants may present unique problems which should be addressed.

Also, a warning system should be incorporated into the basic design of nuclear facilities. Public notification under both test and accident conditions should be included in the discussion of feasibility of protective response plans.

III. The definition of a region for purposes of siting could be keyed to local power grids. For new facilities, it may be preferable to utilize existing sites which are acceptably located (i.e., develop a few reactor parks in selected areas). This would serve to restrict affected population and to reduce the cost of emergency planning. (See our comment on issue XI, below).

VI. Since many existing and planned power plants are sited near navigable waters on which hazardous wastes are transported, the analysis of this issue should include the factors of proximity to water supply and the environmental values of sites adjacent to navigable waters.

In addition, to conduct your analysis of standoff distance from large quantities of explosives or toxic materials, we recommend that you contact our Office of Solid Waste on the availability of data on the location of hazardous waste

facilities. At this time, very general information based on facility notification data is available; more detailed information will be available as permit processing progresses. David Colbert (755-9173) in the Office of Solid Waste can assist you in this effort.

VIII. In examining the implications of precluding nuclear power from any region of the United States, your EIS should consider whether the availability and likelihood of development of other energy sources within a region may result in little nuclear development regardless of your siting criteria. It is questionable whether you should modify your criteria to allow development that is unlikely to occur.

IX. The term "interdiction" is somewhat confusing. We presume it refers to the ability to prevent withdrawals of groundwater or prohibit its movement toward rivers, springs or lakes. Would the term "containment" be more suitable?

Regardless of which term is used, the issue is an important one. We feel, however, that contaminated surface water is equally important and merits some discussion in the EIS. Above all, siting criteria should preclude the possibility of contaminated water reaching public water supplies.

X. The issue of secondary development (post licensing changes) adjacent to nuclear units should receive extensive analysis. Such development may conflict with conditions projected by the applicant and NRC at the time the unit is proposed for approval. The role of the federal government in funding infrastructure that promotes development, and ways such federal actions can be controlled to prevent unwanted development near a nuclear unit, should be examined in the EIS.

XI. The issue of separate versus grouped nuclear plants should be thoroughly assessed on the basis of environmental criteria. There may be significant environmental benefits that result from reducing the number of sites that are disturbed and developed. There may also be significant adverse impacts resulting from cumulative effects of grouped facilities on water quality and quantity, and on environmentally sensitive areas.

XII. This section might be expanded to discuss the feasibility of "withdrawing" or setting aside suitable areas of the public domain for nuclear power sites similar to the withdrawals that are made for hydro power sites.

XIV. The proposed automatic termination of review after state disapproval should also consider the implications of disapprovals by contiguous states within the 50 mile emergency planning zone. Other states often realize less benefit from the generation of power while bearing the cost of maintaining emergency response capability. The review policy which is adopted should be responsive to their views as well as to those of the state in which the facility is physically located.