

YANKEE ATOMIC ELECTRIC COMPANY

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January 27, 1981

Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D.C. 20555

DOCKET NUMBER: 50,51,100
PROPOSED RULE: 45 FR 79820

Attention: Docket and Service Branch

Subject: Comments on Notice of Intent to Prepare an Environmental Impact Statement on Siting (45FR79820-12/2/80)

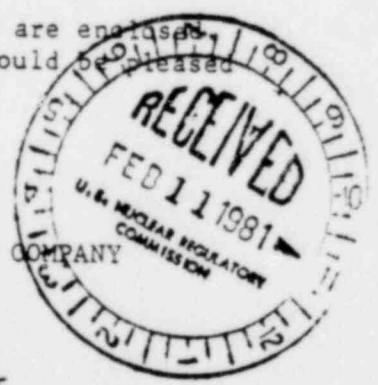
Dear Sir:

Yankee Atomic Electric Company appreciates the opportunity to comment on the subject notice of intent to prepare an Environmental Impact Statement (EIS) on reactor siting criteria. Yankee Atomic owns and operates a nuclear power plant in Rowe, Massachusetts. The Nuclear Services Division also provides engineering services for other nuclear power plants in the Northeast, including Vermont Yankee, Maine Yankee, and Seabrook 1 and 2.

As pointed out to you in our October 28, 1980 letter on the advance notice of rulemaking, we recognize and support the congressional intent to establish a clear siting policy. But we must reiterate our deep concern that promulgation of inappropriate, arbitrary, or superfluous guidelines may preclude future siting of nuclear reactors, which was clearly not the purpose of the Congress. Accordingly, we recommend that the EIS as well as future siting decisions or siting criteria for a region be based on quantitative risk assessments that consider plant design, population, emergency planning, etc. as well as risks from alternate sources of electricity generation.

Specific comments on Appendix A and B of the Notice of Intent are enclosed. We appreciate the opportunity to provide these comments and would be pleased to answer any questions you may have.

Very truly yours,
YANKEE ATOMIC ELECTRIC COMPANY
D.W. Edwards
D. W. Edwards, Director
Operational Projects & Licensing



JHS/sec

Acknowledged by card... 2/3/81

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Yankee Atomic Electric Company

Comments On

Notice of Intent to Prepare an Environmental
Impact Statement (EIS) for Revision of the Regulations
Governing the Siting of Nuclear Power Plants

Appendix A

Part III.1.b.1, Separation of Siting from Design;

We feel this is one of the most important issues to be addressed by the EIS, especially in light of a proposed regionalization scheme. The EIS must quantitatively examine the safety gains versus impacts. Misapplication of this approach whereby site characteristics are reviewed independent of plant design will, in our opinion, detract rather than enhance public safety. The judgment in the EIS on whether the plant and site form an acceptable pair should be predicted on the combined risk to the public relative to specific safety objectives.

Part III.1.b.2, Desired Degree of Remoteness;

This issue should be considered in the EIS, especially in concert with regionalization. The costs/benefits associated with remoteness as an enhancement to safety in siting should be addressed and quantified. Benefits from other factors such as population distribution relative to prevailing meteorological parameters, terrain effects, evacuation and emergency preparedness should be evaluated for various degrees of remoteness. In addition, practical concerns such as locating a generating plant close to the load and the complex matters which arise when a company sites a plant outside its service territory, must be dealt with in the EIS. Likewise, the cost to construct in remote areas as well as the socioeconomic and environmental impacts associated with a large workforce in these areas must be addressed.

Part III.1.b.3, Consideration of Accidents Beyond the Design Basis;

We find no rationale for addressing this issue in the EIS since separate proceedings have already been undertaken by the NRC. It would be premature to address this item in advance of a determination via the Degraded Code Rulemaking.

Part III.1.b.4, Attainable Risk of Nuclear Compared to Risks from Other Power Generation Sources;

A description of how the risk from non-nuclear alternative energy generation sources should be factored into the EIS to attain the goal of minimizing risk to the public from energy generation. The EIS, therefore, must examine the financial and environmental costs associated with the preclusion of nuclear power generation, either on a regional or national basis, and the necessity to substitute generation modes such as coal.

APPENDIX B

Issue III, Definition of Region;

The subject of definition of a region and the associated criteria, as highlighted above, is among the most important issues to be undertaken as part of the siting rulemaking. Although we agree that within the framework of plant siting, demographic setting is an important factor, it is only part of a multifactor consideration. Hence, a site meeting pre-defined demographic criteria may not alone have the best balance of overall characteristics. Plant design and emergency planning must be coupled with site characteristics to address the overall risk to the public. These inter-related factors must be considered simultaneously when performing risk-assessment for a specific facility. Independent consideration, as may arise from this rulemaking, may in fact detract from and be counter-productive to public risk. The EIS must, in our opinion, carefully examine this suggested alternative approach.

Issue IV, Site Availability;

We believe, as explicitly written by the Congress, that standards be established "...so as not to preclude further siting of nuclear reactors in any region of the United States..." Consequently, the EIS must reaffirm this congressional proclamation in the analytical approach employed.

Issue VIII, Precluding Siting of Nuclear Reactors in any Region of the United States;

Our comments in Issue IV above also apply to this issue.

Issue XI, Use of Existing Sites;

Because New England is limited in size, and the extent of its shoreline that can be developed is severely limited through federal and state regulatory management policies, remaining sites suitable for nuclear development are already scarce. Hence, the EIS should examine this approach; however, availability of sites for multi-use only should not be the major criterion.