THE FEDERATION OF ELECTRIC POWER COMPANIES

KEIDANREN KAIKAN
1-9-4,OTE-MACHI, CHIYODA-KU,
TOKYO, JAPAN

Honorable Chairman Ivan Selin
US Nuclear Regulatory Commission
Washington DC 20555
USA

February 4, 1993

Dear Dr. Selin :

As a chairman of the FEPC's(Japanese Federation of Electric Power Companies) Nuclear Power Development Council, I have been paying attention to the importance of the 10 CFR100 rule change proposed by US Nuclear Regulatory Commission.

FEPC represents all nine electric power companies in Japan and is authorized to speak for the utilities on this issue. These nine companies are;
The Hokkaido Electric Power Co. ; The Tohoku Electric Power Co. ; The Tokyo Electric Power Co. ; The Chubu Electric Power Co. ; The Hokuriku Electric Power Co. ; The Kansai Electric Power Co. ; The Chugoku Electric Power Co. ; The Shikoku Electric Power Co. ; and The Kyushu Electric Power Co..
JAPC (Japan Atomic Power Co) also seconds this initiative.

During the course of our preliminary review of the proposed rule FEPC identified a number of specific problems.

First, the decoupling of reactor siting from reactor design is contrary to the internationally-accepted practice of considering engineered safeguard factors in making siting decision. Consequently, it provides a disincentive to improvements of the safety of reactor designs.

Secondly, the numerical criteria for population density and exclusion area boundary distance are unnecessarily restrictive in that they establish a ceiling on population density wholly unrelated to safety goal or to other risks to which the public is exposed. In addition, the numerical criteria, which were initially established in 1975 in Regulatory Guide 4.7 does not reflect the substantial improvements in reactor safety since 1975.

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The proposed rule also requests the use of both the deterministic and the probabilistic seismic analysis approach in determining SSE to allow more informed judgment. Although this approach itself does not seem to be wrong, it is not yet clear if probabilistic seismic analysis methodology and its application in nuclear reactor regulation are matured enough or not.

Although it is true that nuclear safety regulation of an individual country remains national responsibility, it is also true that United States had established the basis of LWR safety regulation in the world and will continue to be very influential in the arena of international safety standards. As a chairman of FEPC's Council of Nuclear Power Development, I intend to submit in a separate letter to the Secretary of the Commission comments to this important issue on behalf of the Japanese utility companies and would like to ask you to consider this issue carefully.

R. Ikegame

Ryo Ikegame
Chairman, Nuclear Power Development Council
FEPC

cc: Commissioner Curtiss
Commissioner de Planque
Commissioner Remick
Commissioner Rogers