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Seacoast Anti-Pollution League

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DOCKET NUMBER 33 50-52+100
100-1081-100 50-52+100
(57FR 47802)

(10)

1603/ 431-5089

Jan. 26, 1993⁹³ FEB -1 A11:26

Secretary, US NRC
Washington, DC 20555
Attention: Docketing and Service

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Dear Secretary,

We write to comment on proposed new rules for siting atomic reactors (Federal Register 47802-47821, October 20, 1992).

The whole impetus of the proposed regulations is clearly to allow the permitting of plants, as indicated by the comment that population restrictions beyond 30 miles "could make it difficult to obtain suitable reactor sites..." Sites, however, are not made suitable -- i.e., suited to public health and safety -- merely by crafting rules that make them permissible. At Seabrook Station, here in New Hampshire, for example, when a severe winter storm recently clogged the cooling water intake pipe and caused a shut-down of the plant, the same storm made travel on the already questionable evacuation routes extremely difficult, sometimes impossible. The shutdown was handled without incident, but it is in circumstances like these that a serious accident would be most probable and evacuation most difficult. We believe, therefore, that the proposed population density limits are too high and should be decreased; that these limits should be requirements, not mere guidelines, and should indeed "indicate the upper limits of acceptability" -- not only for initial site approval or early site permit renewal but for the life of the plant. Further, these requirements should extend at least to 30 miles, and preferably to 50 miles, reflecting the 50-mile ingestion pathway of present regulations.

Likewise, the proposed 0.4 mile exclusion zone should not be reduced for smaller plants, and no new plant should be permitted on existing sites that do not meet the 0.4 mile standard. Permitting a plant on a site which does not meet a standard set for safety reasons would render the standard meaningless. Rather, existing plants on sites that do not meet the standard should be taken out of service as soon as possible.

We urge also the adoption of the recommendation of the 1979 task force on siting that "a final decision disapproving a proposed site by a state agency should be a sufficient basis for NRC to terminate review." Adoption of this recommendation would clearly not give the State authority to grant a construction permit, although it would give the State authority to deny. It is, after all, the right of individual states to adopt environmental standards

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more stringent than federal standards, though not to adopt less stringent standards.

We urge also the adoption of the 1979 task force recommendations regarding minimum permissible distances from man-made and natural hazards such as airports, liquid natural gas terminals, geologic faults, etc..

Yes, setting and enforcing stringent regulations will make siting atomic reactors more difficult; that is the nature of regulations. And the role of the NRC is to regulate. The NRC's primary responsibility is not to ensure the licensing of nuclear plants and the financial health and safety of the nuclear industry, nor even to attempt to ensure an adequate energy supply for the nation; it is to ensure the health and safety of the public.

Thank you for your consideration of these comments.

Sincerely,

Charles W. Pratt

Charles W. Pratt
for the Board of Directors
Seacoast Anti-Pollution League

copies to: Senator Judd Gregg
Senator Robert Smith
Representative Richard Swett
Representative William Zeliff
Governor Steven Merrill