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March 7, 1961

United States Atomic Energy Commission
Washington 25, D. C.

Attention Director, Division of Licensing and Regulation

Gentlemen:

In response to the invitation for comments concerning Notice of Proposed Guides, Reactor Site Criteria, (10 CFR, Part 100) the following is respectfully submitted.

The proposed guides are considerably more definitive than the ones published on May 23, 1959, and are quite helpful.

We suggest, however, especially in the case of proven reactor designs, that you qualify even further the limitations proposed.

Particularly, we would favor the use of qualifying numerical factors rather than words. Where precise factors cannot be determined, perhaps upper limits or maxima could be supplied.

Clarifications and elaborations are also required as follows:

1. What are the population center distances to very large cities?
2. Are "low population zone" and "population center" expressed in terms of present population, or should the projected population ten or twenty years from now be considered?

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3. Are the assumed meteorological conditions (average worst weather conditions for average meteorological regions over the country) valid for all of the United States including Southern California?
4. Is the power level to be used for determining distances from population the total power level of all nuclear units on site or only the power level of the largest unit?

We hope that the above clarifications and elaborations could be included in the Reactor Site Criteria, as they would save a great deal of time and money to all concerned.

Very truly yours,


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Chief Electrical Engineer
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lcc attached