

Pacific Gas and Electric Company

243 Market Street

~~San Francisco 6, California~~

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ATOMIC ENERGY COMMISSION
OFFICE OF THE SECRETARY

~~N. R. Sutherland~~
President

June 14, 1961

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Secretary
U.S. Atomic Energy Commission
Washington 25, D.C.

U. S. ATOMIC ENERGY
COMMISSION
WASHINGTON, D. C.

Attention: Director, Division of Licensing
and Regulation

Gentlemen:

Reactor Site Criteria
Notice of Proposed Guides

We have reviewed the "Notice of Proposed Guides" published in the Federal Register on February 11, 1961 and offer the following comments and suggestions:

1. We believe that the definition of "exclusion area" given in Section 100.3(a) should be modified to permit the inclusion of lands not permanently occupied which are in the public domain, e.g., state or federal beaches and parks and tidelands. It would seem that such lands belong in the same category as highways, railroads, and waterways, which are already so included. Appropriate and effective arrangements could be made to control access to such lands, in case of emergency, in the same way such control would be exercised over traffic on highways, railroads, or waterways.
2. We would like to see the assumptions used in Appendix "A" stated more explicitly. In particular, we feel that the reference containment system should be described fully, including shielding, elevation at which leakage would occur, and other principal factors which would have a bearing on exposure in the event of an accident. To avoid confusion we believe it should be clearly stated that this is a sample calculation based on a specific form of containment and is not representative of containment systems in general.
3. We suggest that a statement be included covering the situation of a multiple reactor installation to the effect that the exposures which would result from an accident should be calculated separately for each reactor, and the largest exposures would be controlling. This is based on the assumption that an accident would not involve more than one reactor.

Very truly yours,

