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DEPARTMENT OF NUCLEAR ENGINEERING

MASSACHUSETTS INSTITUTE OF TECHNOLOGY

CAMBRIDGE 39, MASSACHUSETTS

June 8, 1959

Mr. Harold L. Price, Director
Div. of Licensing and Regulation
U. S. Atomic Energy Commission
Washington 25, D. C.

Dear Mr. Price:

Thank you for the opportunity afforded by your letter of May 26 to comment on the Notice of Proposed Rule Making published in the Federal Register on May 23, 1959, regarding site criteria for evaluation of proposed sites for nuclear power and test reactors.

My first reaction is one of regret that a subject so unsettled and controversial as site selection criteria for nuclear reactors should have been published under the heading of "Notice of Proposed Rule Making." This seems to me to give to the text more of an official and regulatory character than you perhaps had in mind for it.

I particularly deplore the selection of specific minimum distances for the exclusion radii beyond power and test reactors. I think that the values of 1/4 mile for "any power or test reactor" or 1/2 to 3/4 of a mile for "large power reactors" are much greater than would necessarily be required for reactors of a proved type provided with adequate containment. I think that the publication of these specific numbers, even in a tentative regulation, will make it very difficult for the Commission to approve lower values at a later time.

The same general comment is offered in connection with the criterion that "it is usually desirable that a reactor be several miles distant from the nearest town or city" and that large reactors should be 10 or 20 miles from large cities. Interpreted literally, this type of requirement would preclude the construction of power reactors where they would do the most good economically. This requirement may be necessary for reactors of an unproved type provided with inadequate containment, but certainly need not be so strict for well-contained reactors. I should have preferred to see a more highly qualified statement such as "other things being equal, it is desirable to locate reactors outside of densely populated areas. When the purpose to be served by a reactor necessitates its construction close to

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or within a town or city, it is essential that the reactor be provided with dependable containment and other safeguards against the escape of radioactivity."

Speaking generally again, I would react more favorably to a general account of the philosophy of the site selection for nuclear reactors such as the draft prepared by Mr. Joseph Lieberman of the Reactor Development Division than I do to a set of criterion which seek to be as specific as the "Notice of Proposed Rule Making," on which you have asked for my comments.

Sincerely yours,

Manson Benedict

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