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June 8, 1959

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

SUBJECT: Notice of Proposed Rule Making; Criteria for Evaluation of Power and Test Reactor Sites

Dear Mr. Price:

We have read with a great deal of interest the notice of proposed rule making published in the Federal Register of May 23, 1959. Our major comment concerns paragraph b, "Exclusion distance around power and test reactors".

It is not clear to us that it is desirable at this time to establish fixed exclusion areas around reactors and their containments - at least from a technical viewpoint. Under given meteorological conditions, the dose a person receives at the edge of an exclusion area following the "maximum credible accident" is a unique function of the fission products held up in the reactor and the containment leak rate. It seems to us that the plant designer should be free to select the optimum combination of containment and exclusion area which will protect the

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public under the particular set of conditions associated with the proposed installation. Possibly at some future date when a great deal more reactor operating experience has been accumulated, an optimum exclusion area can be determined, but we doubt if such experience is available today.

With reference to paragraph c, we agree that other things being equal it is desirable to locate high power reactors away from centers of population. We also agree with the implication in paragraph b that test reactors, because of the experimental nature of operations associated with them, may present greater possibilities of hazardous release of radioactivity. As a consequence of this consideration, it may be desirable to develop a rule forbidding the operation of high power test reactors in the vicinity of cities or towns, but we feel that it would be unnecessarily restrictive to make such a rule applicable to power reactors intended for routine operation.

We appreciate this opportunity to comment on your proposed rules.

Very sincerely yours,

William M. Breazeale

William M. Breazeale

WMB:EH