## TAMPA ELECTRIC COMPANY

"Center of Power for Florida's Center of Activity"

Tampa, Florida

June 11, 1959

Mr. Harold L. Price, Director Division of Licensing and Regulation United States Atomic Energy Commission Washington 25, D. C.

Dear Mr. Price:

Thank you for your letter of May 26, 1959 with the enclosed notice of proposed rule making. I appreciate the opportunity to comment on the development of definitive site criteria and the factors which might be a basis for the development of such criteria.

Although it seems desirable that precise criteria for evaluation of reactor sites be developed and made part of the Atomic Energy Commission Regulations, I recognize that this is made difficult by the variations in characteristics of different types of reactors.

The safety factors listed in the Commission notice appear to be broad enough to encompass any type reactor and yet be useful as a guide in evaluating the safety aspects of a reactor site.

There is one suggestion I would like to make regarding sections b. and c. I feel it would be better to avoid using distance measurements such as one-half three-quarter miles exclusion radius and 10 to 20 miles from cities for large power reactors. Such distances tend to become fixed in the public mind despite words of flexibility used in connection with them. The proposed regulation does not indicate that improvement in reactor design and safety measures as well as accumulated safety experience may reduce the distances mentioned.

The FWCNG, in considering several possible sites for its proposed nuclear power plant, has been guided by factors essentially as described in your notice.

Yours very truly

PM 60 months

R. D. Welch Florida West Coast Nuclear Group

Copy to Put. Doc. Rm. + R. Lowenstein 6/17/59-mm