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June 12, 1959

Division of Licensing and Regulation
U.S. ATOMIC ENERGY COMMISSION
Washington 25, D.C.

Subject: TITLE 10 - ATOMIC ENERGY
CHAPTER I - ATOMIC ENERGY COMMISSION
NOTICE OF PROPOSED RULE MAKING
(Published in the Federal Register on May 23, 1959)

Gentlemen:

The writer has carefully reviewed the captioned amendment to AEC regulations with respect to site criteria, and wishes to offer the following comments and opinions.

In making these comments, the writer is speaking primarily as a Consulting Engineer engaged in industrial, power plant and utility work although the writer is also engaged in management of the Piqua, Ohio, municipal utilities with the title of Director of Utilities.

The opinions outlined herein are based on a utility experience background as well as that of consulting work.

The Atomic Energy Commission over a period of years has spent a substantial amount of money and made a very serious effort to get a greater number of desirable reactor types in service, both in the United States and abroad. It is the writer's opinion that the adoption of the captioned amendment would nullify to a very serious extent the retention of the civilian reactor program, and further, that the amendment prejudices the future position of large industrial concerns, municipal utilities, and district heating companies in the nuclear power field.

The adoption of this amendment would in substance place the civilian reactor program directly in the hands of a few large utilities whose geographic position permitted the location of reactors on their systems within the area as outlined in the proposed amendment.

It is inconceivable to the writer that with consideration for the amount of public money spent to promote the civilian reactor program, that serious consideration can be given to this amendment with particular reference to Section C - "Population Density in Surrounding Area". This selection of Section C does not mean that the writer approves of the other sections of this amendment, nor of this type of amendment.

A/100 PH 50 Comments

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Logically if such an amendment was passed, it would also mean that nuclear powered marine vessels, both of military and civilian types, should not come within 20 miles of any town or city. The next step in such a program would logically be to review the question of nuclear air craft propulsion with the same type of thinking.

It also logically follows that if large reactors are to be required to locate a distance of from 10 to 20 miles from large cities, then provisions must be made for the retention of this original status. On this basis it is extremely questionable as to whether there would be any development of reactors within the United States for power generation as the acquisition or control of such a zone would place the reactor on an economic basis completely in a non-competitive position.

It is the writer's understanding that the present purpose of the reactor hazard staff and the Advisory Committee on Reactor Safeguards is to properly and reasonably evaluate the hazards involved for a particular type and size of reactor and the containment required for the individual unit. On the basis of the proposed amendment, the judgment and discretion of such groups would be substantially nullified to the detriment of the civilian reactor program.

Messrs. Paul L. Geiringer and Morton J. Goodfriend's recent Report NYO-2332 for the Atomic Energy Commission evaluated the use of nuclear reactors as a source of process and space heat. The amendment in question closes the door as previously stated to such potential uses.

Dr. C. Rogers McCulloch while acting as Chairman of the Advisory Committee on Reactor Safeguards publicly stated that in his opinion distance was no substitute for containment, and the writer fully concurs with this opinion.

It is also axiomatic that containment must be suitable for the particular type and size of reactor with consideration for its environment.

In our American way of life blank checks are generally not considered as a desirable form of currency. Neither can a "blank check" such as the amendment referred to herein be considered as desirable control of a power generation method which in twenty to thirty years time may be the sole hope of maintaining our present economic way of life.

Very truly yours,

Copy sent to PWR & R. Lowenstein
6/17/59
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