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PENNSYLVANIA POWER & LIGHT COMPANY

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June 16, 1959

JACK K. BUSBY
President

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

Attention: Division of Licensing and Regulation

Dear Sirs:

This letter is in response to the Commission's request for comments on a proposed regulation setting forth certain guides for the evaluation of proposed sites for nuclear power and test reactors.

We believe it most desirable that the Commission formulate and publish general site selection guides, but, in our opinion, it is undesirable to designate minimum exclusion distances around power and test reactors, minimum distances of such reactors to the nearest town and city, and maximum offsite population densities. The problem is to establish reasonable assurance that there will be no hazards to the public. Minimum distances and maximum offsite population densities presuppose that there is a minimum hazard from any reactor irrespective of the type, design and safeguards. We do not believe this is so. We suggest that all minimum distances and maximum population densities be eliminated from the proposed regulation and that such factors be given consideration only in relation to the proposed type, design and safeguards of the particular reactor.

If minimum exclusion distances around reactors are to be retained in the regulation, some exception should be made for that part of the exclusion distance which would include a river. As you know, economy requires the location of steam electric power plants on the banks of rivers in order to provide adequate water for cooling purposes. Any such river, along which a power reactor is located, would not be "under the complete control of the licensee" and the proposed regulation would seem to require the location of the reactor far enough from the river so that the river would not be within the exclusion distance. The very substantial increase in the cost of the reactor plant which would thereby result does not appear to be justified since there are likely to be few, if any, people on any such river in the vicinity of the reactor, most such rivers being used only for recreation purposes. Warning devices would be adequate to clear the river in the vicinity of the reactor, if necessary.

Handwritten notes:
of the P&L 1/11/59
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Very truly yours,

Handwritten signature: Jack K. Busby
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