

856-9

UNIVERSITY OF CINCINNATI  
COLLEGE OF ENGINEERING  
CINCINNATI 21, OHIO

DEPARTMENT OF CHEMICAL ENGINEERING  
AND METALLURGICAL ENGINEERING

June 17, 1959

United States Atomic Energy Commission  
Division of Licensing and Regulation  
Washington 25, D. C.

Re: 10 CFR Chapter 1  
Power and Test Reactors  
Notice of Proposed Rule Making

Gentlemen:

I recommend reconsideration of the proposed rules for the location of and exclusion areas for power and test reactors. I feel that the regulations as suggested in the proposal are unreasonable general restrictions and ones which would be impossible to apply realistically. The objections are as follows:

- (a) The proposed exclusion areas are so large that the rule may prevent institutions or industries of moderate size from participating in the test or power reactor programs. Institutions or industries having an established operating base in an industrial community should not be prohibited by regulation from entering into the reactor field, since in many cases, the use of their facilities plays an important part in their participation.
- (b) The development of nuclear power stations at or near existing electrical generating stations or electrical distributing points will be severely handicapped because of the location of the stations and points near waterways and population centers.
- (c) Low population density in the surrounding areas cannot be maintained by the reactor operating company. Even if the initial selection of the site is based on this condition, the company cannot control or even direct the use of adjacent lands not in its possession. Further restrictions to the use of the land will not be acceptable to the land owners.

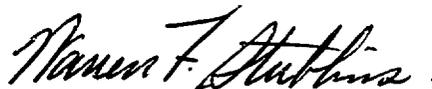
copy sent to DGC & PDR 6/19/59 - *man*  
A1107  
*MAN* *PK*

- (d) The publication of these restrictions would re-enforce the public objections to and suspicions of reactor projects being placed in the community which do not fall into the classification of test or power.
- (e) The remoteness of a reactor facility to arterial highways, air fields and factories cannot be maintained by the reactor operating companies. Indeed, the nearness to these facilities may be a significant advantage to the reactor operation. This is contradictory to the development of nuclear propulsion systems for ships, locomotives and aircraft.

It is suggested that the basis of safety of operation be the following:

- (a) that there be adequate containment of the reactor by physical means, not by space, and
- (b) that the proposed rules on placement of and exclusion areas for reactors be applied only to reactors of untested types or those for test of extreme conditions.

Sincerely yours,



Warren F. Stubbins  
Associate Professor  
Nuclear Science

WFS:lh