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PACIFIC GAS AND ELECTRIC COMPANY

RICHARD H. PETERSON
GENERAL COUNSEL
F. T. SEARLS
GENERAL ATTORNEY

245 Market Street
San Francisco 6
SUtter 1-4211

JOHN J. BRIARE	WILLIAM B. KUDER
JOHN C. MORRISSEY	W. E. JOHNS
FREDERICK W. MIELKE, JR.	R. A. RAFTERY
MALCOLM H. FURBUSH	CHARLES T. VAN DEUSEN
JOHN A. SPROUL	MALCOLM A. MACKILLIP
PHILIP A. CRANE, JR.	NOEL KELLY
RICHARD A. CLARKE	HENRY J. LAPLANTE
MICHAEL G. HARRINGTON	DAVID R. FULLER
GILBERT L. HARRICK	EDWARD J. MCGANNEY
JOHN S. COOPER	ROGER J. NICHOLS
JOHN B. GIBSON	GLENN WEST, JR.

ATTORNEYS

June 19, 1959

United States Atomic Energy Commission
Washington 25, D. C.

Attention: Division of Licensing and Regulation

Gentlemen:

The following are our comments concerning the Notice of Proposed Rule Making published in the Federal Register on May 23, 1959, covering factors considered in site evaluation for power and test reactors.

1. As pointed out in the notice, there is an extremely wide variation in environmental conditions from one location to another, as well as in reactor characteristics. We therefore question whether the criteria for site evaluation should be as specific as those set forth in the Notice of Proposed Rule Making. In view of these wide variations each site will have to be judged upon its own merits, so it appears desirable to frame the criteria to be used in as general terms as possible. Otherwise some potential sites may be automatically disqualified, whereas a detailed study might show them to be eminently satisfactory.

2. With regard to the exclusion distance around power and test reactors, while an exclusion area is probably desirable for a test or experimental reactor, we question whether such areas should be required for power reactors of proven design. In addition, it seems to us to be particularly undesirable to specify minimum radii for the reasons outlined under point 1 above.

3. With regard to seismological considerations the proposal provides that a site should not be located on a fault. In the West Coast area, where earthquakes are more common than in other parts of the country, the strict

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application of this proposal to an entire site area could eliminate many desirable locations. Structures can be built adjacent or near to earthquake faults to withstand severe shocks without failure. In California we know of no structure which has been severely damaged by an earthquake for which the designer and builder took earthquake forces into consideration. For these reasons if a prohibition against location on a fault be included at all, we suggest that it be limited to location of the reactor and auxiliaries.

Very truly yours,


RICHARD H. PETERSON

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KAISER ENGINEERS
DIVISION OF HENRY J. KAISER COMPANY
KAISER BUILDING • OAKLAND 12, CALIFORNIA

June 2, 1959

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

Dear Mr. Price:

In your letter of May 26, you invited comments on your NOTICE OF PROPOSED RULE MAKING with respect to "Factors Considered in Site Evaluation for Power and Test Reactors".

One of the items that appears to be unduly restrictive is the requirement in paragraph c. that "... the reactor should be several miles distant from the nearest town or city and for large reactors, a distance of 10 to 20 miles from large cities". With the growing urbanization of many parts of the United States, this requirement, especially if taken literally to mean 10 to 20 miles from the city limits, places an additional stumbling block in the development of nuclear power. Rather than establish a minimum distance from a "large city", perhaps a better criterion would be to establish a maximum number of people who might receive an over-exposure in the event of a "Maximum Credible Accident". Then the reactor builder could determine, subject to AEC approval, the optimum combination of exclusion zone, distance from populated areas, containment features, and inherent safety features in the reactor--which would provide adequate safety to the public at minimum cost.

We appreciate the opportunity to present our comments to you on this important subject.

Very truly yours,

KAISER ENGINEERS
Division of Henry J. Kaiser Company

Patrick J. Selak
Patrick J. Selak

Manager
Nuclear Engineering Development

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