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BECHTEL CORPORATION  ENGINEERS-CONSTRUCTORS
TWO TWENTY BUSH STREET · · · SAN FRANCISCO 4, CALIFORNIA

June 23, 1959

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

Dear Harold:

After reviewing the proposed AEC rule-making concerning environmental factors considered in site evaluation for power and test reactors (Title 10, Chapter I), we have the following comments.

The approach is, we believe, a very good one. An early site hearing will help to eliminate local concern and to reassure a potential power reactor operator of the suitability of his site, even though that site may not, at the time of the site hearing, receive final approval.

Concerning the exclusion distance, it is stated that for any power or test reactor a minimum radius on the order of one-quarter mile will usually be found necessary. The proposed rule also states that for large power reactors a minimum exclusion radius of one-half to three-quarters mile may be required. We believe that terrain should be cited as an important mitigating factor which could serve to vary these distances. As an example, a site surrounded by hills which are controlled by the reactor operator is a much better exclusion area than would be a site on a flat terrain; therefore, a requirement for one-half to three-quarters mile exclusion radius may be excessive in such a case.

Inasmuch as power reactors are usually situated on or near rivers, lakes, or the ocean, it would seem desirable to make some statement concerning the treatment of such water areas as controlled or exclusion areas. Another special point also concerns the consideration of railroads, highways, and water traffic which often pass near sites suitable for large power plants. The ability to control such traffic would appear to be of importance.

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The proposed rule-making states that a power or test reactor should be several miles distant from the nearest town or city, and for large reactors, a distance of ten to twenty miles from large cities. We believe that a statement might be made that the addition of extra hazard protection measures, depending on the type of reactor, might make it possible to consider construction of reactors close to large cities. We do not believe that it is wise or necessary at this time to state an explicit distance of ten to twenty miles since, in some circumstances, this may turn out to be an inordinantly limiting condition - a condition which will be found unnecessary as time goes on.

Our third comment concerns seismiological considerations. We should like to suggest that the last sentence in the relevant section be altered to state "A site should not be located on an active fault." Much of the United States is so thoroughly faulted that a flat statement such as is made in paragraph "e" appears unnecessary and over-limiting.

We also believe that some reference should be made to the time at which population factors are taken into consideration. It's conceivable that during the construction of a plant local population factors would be affected by the construction work. Although this change would be only temporary, it might create an unjustified problem for the reactor operator when the final hazards review takes place.

Very truly yours,



W. Kenneth Davis
Vice President