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GENERAL ELECTRIC  
COMPANY  
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VICE PRESIDENT-ATOMIC BUSINESS DEVELOPMENT  
MARKETING SERVICES

June 23, 1959

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

Attention: Division of Licensing and Regulation

Gentlemen:

I have carefully studied the proposed AEC regulation (10 CFR Chapter 1) -- Power and Test Reactors, and at this point I have the following comments:

1. I am extremely happy to see the start of written regulations in the reactor safety field.
2. I understand that the specific numbers used in the regulation, as well as certain of the criteria, may be the subject of some critical comment. For example, for a variety of persuasive reasons large reactors are usually placed close to a body of water. It is not clear how this may be planned for in the future in view of the proposed exclusion area requirements.

Again it is indicated that deposits of relatively impermeable soils over ground water courses are desirable because they offer some protection for the ground water. This raises the question whether, in order to protect the ground water, in many cases it may be desirable to select sites with permeable soil to permit advantage to be taken of the waste disposal capability of the soil. For example, at Hanford the permeability of the soils over the ground water is depended upon to conduct the liquids, from which the radioisotopes have been removed by exchange in the soils, to the ground water. With impermeable sediments over the ground water table, one can run into situations where the drainage may be to a point many miles away in completely unsuspected areas, making monitoring difficult.

*Copies to PDR + DEC 6/25/59 - m. AH19*  
*PH. Comments*  
*6-23-59*

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I intend to participate in the Atomic Industrial Forum meeting on June 30, at which it is proposed to discuss this regulation. Hence I trust that you will consider this letter entirely tentative and will accept further comments based on a better understanding, which I am sure will be the result of this meeting.

Very truly yours,

*Francis K. McCune*

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