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NORTHERN STATES POWER COMPANY

MINNEAPOLIS 2 MINNESOTA

July 10, 1959

Atomic Energy Commission
Washington
D.C.

Attention: Director, Division of Licensing and Regulation

PROPOSED REGULATION, SAFETY CRITERIA FOR REACTOR SITES

Dear Sir:

This is in response to the Commission's invitation to comment on the above regulation.

We are in accord with the Commission's evident view that a regulation is needed describing the safety factors which bear on a decision to issue or refuse a construction permit. We believe, however, that the issuance of such a regulation at this time is premature, for the reason that such a regulation now must either be so indefinite that it would provide little guidance, or contain numbers which are presently quite uncertain. For example, it is usually desirable, from the standpoint of economy and service reliability, that a power plant be near a center of population. The proposed regulation suggests 10 to 20 miles from large cities. The spread, 10 to 20 miles, is very material, and the concept of a "large city" indefinite. We believe that such indefiniteness is highly undesirable in a regulation, and we fear that such numbers may become permanently frozen in the regulation.

There is need for guidance in this area. We understand that the Commission has been working on a listing of the information required in an application for a construction permit, scheduled as to priority of submission, and containing information as to the time and procedures required by the Commission for consideration of the information and issuance of a permit. We think that such a list would provide valuable guidance, and should be issued as soon as it can be completed.

A list as above would not only serve as a guide, but would, we believe, substitute to a degree for a regulation until a satisfactory regulation can be issued.

We are pleased to have this opportunity to comment, and we hope our comments are of value to you.

Very truly yours,
Hibbert Hill
Hibbert Hill
Chief Engineer



HH/jdb
Cys to Pub Doc Rm
α OGC 7/14 DM.

acknowledged 7/17/59
A/150
James R. ...
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