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ELECTRIC CORPORATION

ATOMIC POWER DEPARTMENT

P.O. BOX 355
PITTSBURGH 30, PA.

July 15, 1959

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

Subj: Comments on Proposed Site Selection Criteria

Dear Mr. Price:

We are pleased to forward for your consideration our comments on the proposed site selection criteria.

In order for atomic energy to serve future world power needs most effectively, it will be necessary for each plant built to provide minimum power costs consistent with public safety. To provide for minimum power costs, it will be necessary to place these plants at the optimum location with respect to power system economics. It is the ultimate objective of nuclear plant designers to build safe nuclear power plants over as wide a range of site conditions and environment as is required by the economics of power generation.

First, we are quite concerned about the proposed rules pertaining to required exclusion areas. The safety of the public is a function of many factors, of which exclusion area is only one. Specifically, we feel that the safety of the public can best be maintained by proper engineering design consideration of <u>all</u> the important variables including reactor size and type, core safety cooling system, possibilities of release of fission products from the reactor system and subsequent leakage from the vapor container, exclusion area and meteorological conditions, to name but a few. The safety of the public cannot be insured by any single condition such as exclusion area, but rather is the certain result of the optimum combination of many interrelated factors. To specify minimum exclusion area is neither necessary nor sufficient. We feel certain that with proper engineering design, future nuclear power plants can be safely located within the center of large cities and high population density regions.

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Second, regarding the proximity of surrounding population to the plant, there is no way of preventing a population buildup from occurring outside the exclusion area immediately after plant construction. Population changes cannot be controlled beyond the exclusion area of a nuclear power plant and, therefore, it seems rather pointless to provide for an initial condition that cannot be maintained.

Third, we agree that meteorological conditions, seismological conditions, hydrology and geology are important factors in the selection of a nuclear power plant site. However, these factors will determine the type of engineering design necessary to protect the public and should not, of themselves, preclude the choice of a particular site.

In summary, we recognize the value of having a set of site selection criteria for guidance in connection with future plant design. Such a set of criteria will render a service in terms of defining design areas to be evaluated by the nuclear plant designer, insuring that important plant safety implications are adequately considered. However, reaffirming our earlier point, we feel that the safety of a nuclear plant is dependent upon the combined effect of a large number of design variables of which site conditions are only a contributing factor. The criteria, of themselves, should not dictate engineering design but should serve to outline the problems leaving a maximum of design flexibility to the engineer. In this manner, the safety of the public can best be maintained.

We feel that any set of criteria, in a field moving as fast as the nuclear power field, will require additions or changes as new technical information and operating experience becomes available. Procedures for accomplishing these changes should be determined at the outset.

We thank you for the opportunity of presenting our views on this vitally important subject.

Very truly yours,

Robert L. Wells

Robert L. Wells
General Manager
Atomic Power Department